

NOTICE OF DECISION

Case File: T2-2019-11464
Permit: Columbia River Gorge National Scenic Area (NSA) Site Review
Applicant(s): Terra Lingley, ODOT **Owner(s):** Oregon Department of Transportation (ODOT)
Location: Historic Columbia River Highway Sandy River Bridge (Hwy 30)
Sec 25D, Township 1 North, Range 3 East, W.M.
Zoning: Gorge Special Open Space, Special Management Area (SMA)
Proposal Summary: Request for NSA Site Review for rehabilitation and modification of the historic Sandy River (Troutdale) Bridge to replace and widen pedestrian walkway on the bridge, upgrade lighting on bridge to enhance roadway and walkway safety, replacing trestle on the west side, and updating the roadside barrier on the northeast side of the bridge.

Decision: Approved with Conditions

This decision is final and effective at the close of the appeal period, unless appealed. The deadline for filing an appeal is August 16, 2019 at 4:00 pm.

Opportunity to Review the Record: The complete case file, including the Planning Director Decision containing Findings, Conclusions, Conditions of Approval, and all evidence associated with this application is available for review at the Land Use Planning office. Copies of all documents are available at the rate of \$0.30/per page. For further information, George Plummer, Planner at (503) 988-0202 (8 am to 4 pm Tuesday through Friday) or george.a.plummer@multco.us or (503) 988-3043.

Opportunity to Appeal: An appeal requires a \$250.00 fee and must state the specific legal grounds on which it is based. To obtain appeal forms or information on the procedure, contact the Land Use Planning office at 1600 SE 190th Avenue (Phone: 503-988-3043). This decision is not appealable to the Land Use Board of Appeals until all local appeals are exhausted.

Issued By:



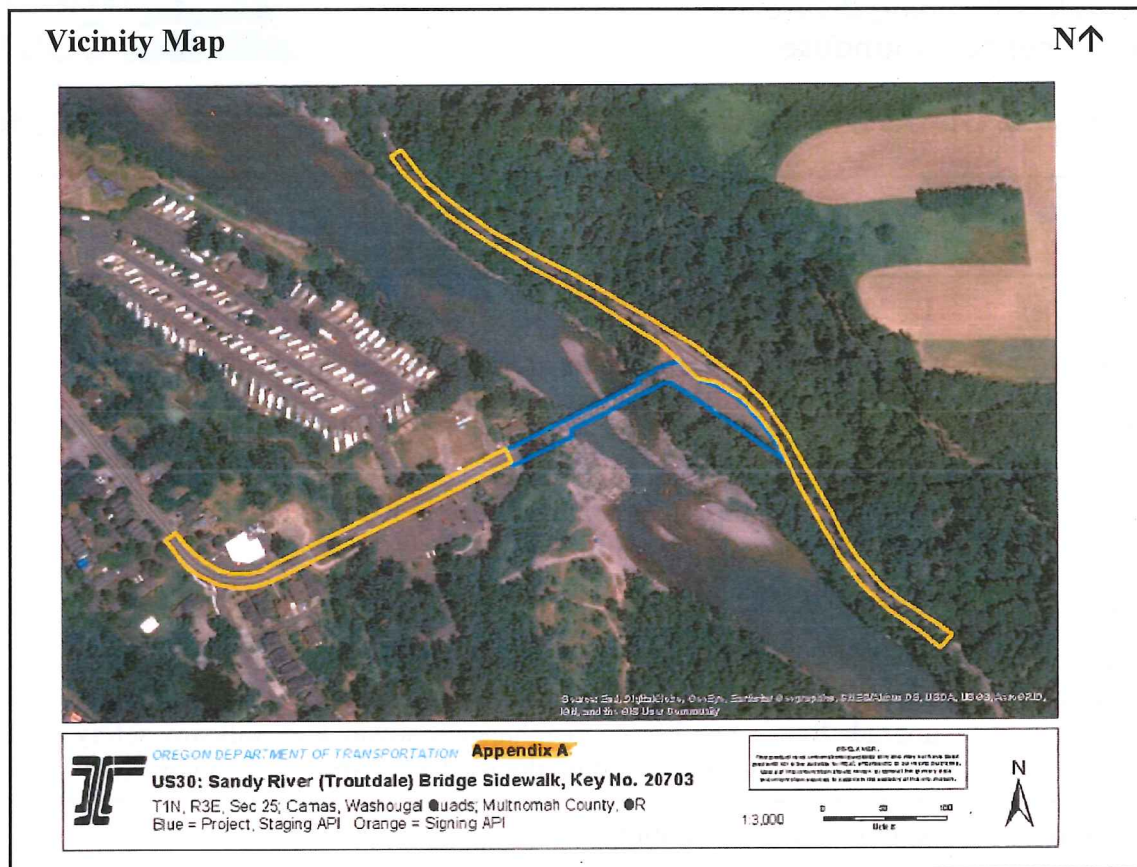
George A. Plummer, Planner

For:

Adam Barber,
Interim Planning Director

Date:

August 2, 2019



For this application to be approved, the proposal will need to meet the applicable approval criteria below:

Applicable Approval Criteria: Multnomah County Code (MCC): MCC 38.0030 Existing Uses and Discontinued Uses, MCC 38.2600 - 38.2695: Gorge Special Open Space (SMA), MCC 38.7040: SMA Scenic Review Criteria, MCC 38.7050: SMA Cultural Resource Review Criteria, MCC 38.7075 SMA Natural Resource Review Criteria, and MCC 38.7085 SMA Recreation Resource Review Criteria

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

Copies of the referenced Multnomah County Road Rules (MCRR) sections can be obtained by contacting our office at (503) 988-3043 or by visiting our website at <https://multco.us/transportation-planning/>.

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

Conditional of Approval

The conditions listed are necessary to ensure that approval criteria for this land use permit are satisfied. Where a condition relates to a specific approval criterion, the code citation for that criterion follows in parenthesis.

1. Approval of this land use permit is based on the submitted written narrative(s) and plan(s). No work shall occur under this permit other than that which is specified within these documents. It shall be the responsibility of the property owner(s) to comply with these documents and the limitations of approval described herein. [MCC 38.0660]
2. ODOT shall ensure that the work on the bridge be as described and submitted to Oregon State Historic Preservation Office (SHPO) in the Oregon Inventory of Historic Place, Section 106 Level of Effect Form (Exhibit A.6) and as approved by SHPO. [MCC 38.7045]
3. This land use permit expires two years from the date the decision is final pursuant to MCC 38.0690 (B)) as applicable.
Note: The property owner may request to extend the timeframe within which this permit is valid, as provided under MCC 38.0700 as applicable. The request for a permit extension must be submitted prior to the expiration of the approval period.
4. Prior to and during construction, ODOT and their representative shall ensure that containment net is installed under the bridge to catch debris and other items that may fall. [MCC 38.0660 & MCC 38.7075]
5. The walkway shall be a dark earthtone color such as shown on the Columbia River Gorge Commission Scenic Resources Implementation Handbook, Color Chart, Rows A or B or C 14, C15, or C16. [MCC 38.7040 (10)]
6. The new modifications and change in materials, the walkway deck and railing as seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity. [MCC 38.7040 (11)]
7. 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. [MCC 38.7040(12)]
8. ODOT shall submit to Multnomah County Land Use Planning documents that verify that the project is meeting the proposed measures to prevent impact that are discussed in the Biologic Resources Impact Memo (Exhibit A.7). [MCC 38.7075(X)]
9. ODOT shall submit to Multnomah County Land Use Planning and US Forest Service, NSA office verification through submitted documents when the project is complete that the project met the proposed measures to prevent impact that are discussed in the Biologic Resources Impact Memo (Exhibit A.7). If the project failed to meet the plan, that must be reported to the above cited offices as soon as the failure is discovered. [MCC 38.7075(Y)]
10. If any Cultural Resources and/or Archaeological Resources are located or discovered on the property during this project, including finding any evidence of historic campsites, old burial grounds, implements, or artifacts, the following procedures shall be implemented: [MCC 38.7045 (L) and (M)]
11. All survey and evaluation reports and mitigation plans shall be submitted to the Planning Director and SHPO. Indian tribal governments also shall receive a copy of all reports and plans if the cultural resources are prehistoric or otherwise associated with Native Americans.

- a) Halt Construction – All construction activities within 100 feet of the discovered cultural resource shall cease. The cultural resources shall remain as found; further disturbance is prohibited.
- b) Notification – The project applicant shall notify the County Planning Director and the Gorge Commission within 24 hours of the discovery. If the cultural resources are prehistoric or otherwise associated with Native Americans, the project applicant shall also notify the Indian tribal governments within 24 hours.
- c) Survey and Evaluation – The Gorge Commission will survey the cultural resources after obtaining written permission from the landowner and appropriate permits from SHPO (see ORS 273.705 and ORS 358.905 to 358.955). It will gather enough information to evaluate the significance of the cultural resources. The survey and evaluation will be documented in a report that generally follows the standards in MCC 38.7045 (C) (2) and MCC 38.7045 (E).
- d) Mitigation Plan – Mitigation plans shall be prepared according to the information, consultation, and report standards of MCC 38.7045 (J). Construction activities may recommence when the conditions in the mitigation plan have been executed. [MCC 38.7045 (L)]

12. The following procedures shall be in effect if human remains are discovered during excavation or construction (human remains means articulated or disarticulated human skeletal remains, bones, or teeth, with or without attendant burial artifacts):

- a) Halt Activities – All survey, excavation, and construction activities shall cease. The human remains shall not be disturbed any further.
- b) Notification – Local law enforcement officials, the Multnomah County Planning Director, the Gorge Commission, and the Indian tribal governments shall be contacted immediately.
- c) Inspection – The State Medical Examiner shall inspect the remains at the project site and determine if they are prehistoric/historic or modern. Representatives from the Indian tribal governments shall have an opportunity to monitor the inspection.
- d) Jurisdiction – If the remains are modern, the appropriate law enforcement officials will assume jurisdiction and the cultural resource protection process may conclude.
- e) Treatment – Prehistoric/historic remains of Native Americans shall generally be treated in accordance with the procedures set forth in Oregon Revised Statutes, Chapter 97.740 to 97.760.
 - i. If the human remains will be reinterred or preserved in their original position, a mitigation plan shall be prepared in accordance with the consultation and report standards of MCC 38.7045 (I).
 - ii. The plan shall accommodate the cultural and religious concerns of Native Americans. The cultural resource protection process may conclude when the conditions set forth in the standards of MCC 38.7045 (J) are met and the mitigation plan is executed. [MCC 38.7045 (M)]

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

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

Findings of Fact

FINDINGS: Written findings are contained herein. The Multnomah County Code (MCC) criteria and Comprehensive Plan Policies are in **bold** font. Staff analysis and comments are identified as ‘**Staff:**’ and address the applicable criteria. Staff comments may include a conclusionary statement in *italic*.

1. Project Description:



Appendix C - Existing Walkway



Appendix C - Proposed Walkway Visualization

Staff: Request for NSA Site Review for rehabilitation and modification of the Historic Sandy River (Troutdale) Bridge to replace and widen pedestrian walkway on the bridge, upgrade lighting to enhance roadway and walkway safety, replacing trestle on the west side, and updating the roadside barrier on the northeast side of the bridge. A more detailed description of the project is included as Exhibit A.11 and listed below.

Applicant: The scope of this work includes replacing the existing pedestrian walkway (including parts of the supporting brackets, and all of the stringers, rail, and deck) with a new widened walkway with plastic lumber deck with steel stringers. In addition, the project will perform some much needed repairs to the bridge bearings, joints and end post. See below for a complete list of anticipated scope items (Exhibit A.11):

- Replace existing pedestrian walkway with a wider dark earthtone plastic lumber walkway
 - Handrail replacement, replacing wood post with aluminum posts and horizontal boards with aluminum horizontal members painted white.
 - Adjust sewer and gas pipe lines and change support brackets
 - Replace conduit and other electrical features attached to walkway
 - Lead paint and asbestos surveys and abatement
- Replace end deck joint with new pourable joints
- Replace current timber trestles on west end with steel frame on concrete footings
- Lattice rail replacement at east end of truss
 - Up to two panels will need to be replaced
 - Single lane closure required
- End post strengthening at east end of truss
 - Remove diagonal brace and existing cover plates

- Install new cover plates
- Full bridge closure required
- Fixed bearing rehabilitation at Abutment B (East End Truss)
- Install LO panel point covers

2. PROPERTY DESCRIPTION & HISTORY

Staff: The Sandy River (Troutdale) Bridge was built in 1912 by Multnomah County at the beginning and west end of the Historic Columbia River Highway in the City of Troutdale. The bridge is located within the Columbia River Gorge National Scenic Area (the NSA boundary runs along the western ordinary high waterline of the Sandy River).

The pedestrian walkway was added to the south side of the bridge in the 1920s. The walkway has been replaced, either completely or in part, at least three times, with the steel supporting brackets added in 1949.

The Sandy River Bridge is a contributing feature in the Historic Columbia River Highway National Landmark District. “The walkway was not included in the nomination as it was added after the original construction” (Exhibit A.11).

3. GORGE SPECIAL OPEN SPACE

3.1. Allowed Uses

MCC 38.1005(B) The following uses may be allowed without review in all zone districts:

(1) Repair, maintenance and operation of existing structures, including, but not limited to, dwellings, agricultural structures, trails, roads, railroads, and utility facilities.

Staff: The proposed project for rehabilitation or modification of the Historic Sandy River (Troutdale) Bridge includes repair, maintenance and operation of the existing Historic Sandy River (Troutdale) Bridge. The project also includes modifications with a wider pedestrian walkway including different material used for the deck and railing. The proposal includes replacing the walkway with plastic deck planks instead of the existing wooden deck and aluminum railing instead of wood. The different materials are needed to reduce weight load on the stressed aging bridge. The proposal also includes upgrading the lighting to improve safety. This decision is a review of the proposed modifications, the rehabilitation including repair and maintenance is an allowed use.

3.2. Review Uses

MCC 38.2625(D): The following uses may be allowed on lands designated GSO, pursuant to MCC 38.0530 (B), when consistent with an open space plan approved by the U.S. Forest Service and upon findings that the NSA Site Review standards of MCC 38.7000 through 38.7085 have been satisfied:

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

Staff: The proposed work on the bridge which includes modification requires an NSA Site Review demonstrating the standards of MCC 38.7000 through 38.7085 have been satisfied by the application proposal. The proposed project includes reconstruction, replacement, and expansion of existing structures of the existing bridge including the replacing and expanding pedestrian walkway width and using different materials, upgrading lighting to enhance safety and replacing trestle on the west side, and updating the road side barrier on the east side of the bridge. A full list of the proposed project can be found in Section 1 of this decision and in Exhibits A.6 and A.11.

3.3. Definitions

As used in this Chapter, unless the context requires otherwise, the following words and their derivations shall have the meanings provided below.

MCC 38.0015: Existing use or structure:

Any use or structure that was legally established. "Legally established" means:

- (a) the landowner or developer obtained applicable land use and building permits and complied with land use regulations and other laws that were in effect at the time the use or structure was established, or that were in effect at the time the landowner or developer corrected an improperly established use or structure;**
- (b) the use or structure was initially operated or constructed according to those applicable permits, land use regulations and other laws, or has been operated or constructed according to permits obtained to correct an improperly established use or structure; and**
- (c) any changes to the original use or structure must comply with all applicable permit requirements, land use regulations and other laws that were in effect at the time the change was established.**

MCC 38.0015: Maintenance:

Ordinary upkeep or preservation of a serviceable structure affected by wear or natural elements. Maintenance does not change the original size, scope, configuration or design of a structure.

Maintenance includes, but is not limited to, painting and refinishing, regrouting masonry, patching roofs, grading gravel roads and road shoulders, cleaning and armoring ditches and culverts, filling potholes, controlling vegetation within rights-of-way, removing trees and other roadside hazards within rights-of-way, and testing and treating utility poles.

MCC 38.0015: Repair:

Replacement or reconstruction of a part of a serviceable structure after damage, decay or wear. A repair returns a structure to its original and previously authorized and undamaged condition. It does not change the original size, scope, configuration or design of a structure, nor does it excavate beyond the depth of the original structure. Up to a 10 percent increase in the original size of a portion of a building to be repaired is allowed if required to comply with building codes, provided it does not require additional excavation.

Repair includes, but is not limited to, reproofing a building, replacing damaged guardrails, reconstructing a rotten deck or porch, replacing a broken window or door, replacing a utility pole and associated anchors, replacing a section of broken water or

sewer line, replacing a damaged or defective utility line, reconstructing a portion of a building damaged by fire or a natural event, and replacing railroad ties or rails.

Staff: The bridge was lawfully established in 1912 (predating zoning regulations) and has been maintained by the ODOT as part of the Historic Columbia River Highway. The proposed project includes maintenance and repair of an existing structure for much of the proposed project. Repair allows for replacement or reconstruction in-kind for damaged or worn-out component parts of the bridge. Replacements must not change the original size, scope, configuration or design of a structure. Work done under “maintenance” and “repair” is an allowed use. However, the proposal also includes modifications including replacing and widening the walkway with plastic deck planks instead of the existing wooden deck and aluminum railing instead of wood. The different materials are needed to reduce weight load on the stressed aging bridge. The proposal also includes upgrading the lighting to improve safety. This decision is a review of the proposed modifications,

The project qualifies for an “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.” The project was reviewed by the Oregon State Historic Preservation (Exhibit A.6) issuing a “concurrence finding” for the ODOT finding that the project would have “No Adverse Effect” on the historic properties for the US30: Sandy River (Troutdale) Bridge Project is a property listed in the National Register of Historic Places and a National Historic Landmark.

3.4. Existing Uses

MCC 38.0030 (A) Right to Continue Existing Uses and Structures: Any existing use or structure may continue so long as it is used in the same manner and for the same purpose, except as otherwise provided.

Staff: The bridge was established in 1912 and has been maintained by the ODOT as part of the Historic Columbia River Highway. The bridge is a historic legally existing structure.

4. SMA SCENIC REVIEW CRITERIA

MCC 38.7040 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:

Staff: The project qualifies for an “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.” The project was reviewed by the Oregon State Historic Preservation (SHPO) issuing a “concurrence finding” for the ODOT finding that the project would have “No Adverse Effect” on the historic properties for the US30: Sandy River (Troutdale) Bridge Project a property listed in the National Register of Historic Places and a National Historic Landmark (Exhibit A.6).

Staff will make findings addressing the scenic review standards for the rehabilitation or modification of the historic bridge, given the bridge's historic status, the project has an exception status. Following are Scenic Review findings for the rehabilitation and modification of the existing historic bridge. The proposed project meets the rehabilitation or modification of historic structure standard.

4.1. MCC 38.7040(A) All Review Uses and Conditional Uses visible from KVAs. This section shall apply to proposed development on sites topographically visible from KVAs:

Staff: The bridge is topographically visible from the Historic Columbia River Highway and from the Sandy River KVAs.

4.1.1. (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.

Staff: The proposed rehabilitation or modification of the bridge by its structural nature must be bridge components. The project is rehabilitation or modification of historic structures on the National Register of Historic Places when such modification is in compliance with the national register of historic places guidelines. As stated earlier the project was found by SHPO to have "No Adverse Effect" on the historic property (Exhibit A.6). The proposed components used in the rehabilitation or modification of the bridge qualified and meets the "No Adverse Effect" on the historic status of the bridge and is consistent the Historic Columbia River Highway scenic corridor strategy.

The pedestrian walkway components of support structure, deck, and "handrail" were added to the bridge in 1920s and has been replaced three times since then. The project includes replacing and expanding the existing pedestrian walkway wood deck with a dark earthtone plastic lumber walkway. The proposed handrail (guardrail) replacement, will replace wood post with aluminum posts and horizontal boards with aluminum horizontal members painted white. The replacement of wood is to provide more durable materials and to significantly reduce the weight on the already weight stressed, aging bridge. The widened walkway replacement is a modification of an historic bridge structure which is allowed given the SHPO finding of "No Adverse Effect" on the historic property.

The proposed handrail (guardrail) with aluminum posts and aluminum horizontal members painted white is designed to mimic the existing guardrail and recommended standard guard rail in the Historic Columbia River Highway scenic corridor strategy which recommendations under # 6. "Use two-rail, wooden guardrail, painted white" highway guardrails.

While the proposed walkway and handrail will be aluminum instead of wood, it will have the appearance of the historic guard railing along the Historic Columbia River Highway and used on sections of the Historic Highway State Trail, without the weight stress on the bridge of wooden components. *The proposed project meets the rehabilitation or modification of historic structure standard.*

4.1.2. (2) The required SMA scenic standards for all development and uses are summarized in the following table.

REQUIRED SMA SCENIC STANDARDS		
LANDSCAPE SETTING	LAND USE DESIGNATION	SCENIC STANDARD
River Bottomlands	Open Space	NOT VISUALLY EVIDENT

Staff: The bridge is located in the River Bottomlands Landscape Setting with a Land Use Designation of Open Space thus the Scenic Standard is “Not Visually Evident.”

4.1.3. (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.

Staff: The scenic standard is “not visually evident.” Due to the minor nature of the project, the proposed rehabilitation or modification of the bridge will not result in any component that is visually evident, except the replacement guard railing along the pedestrian walkway which is a replacement in kind allowed outright and meeting the Historic Columbia River Highway scenic corridor strategy.

The proposed rehabilitation or modification of the bridge by its structural nature must be bridge components. The project is rehabilitation or modification of historic structures on the National Register of Historic Places when such modification is in compliance with the national register of historic places guidelines. As stated earlier the project was found by SHPO to have “No Adverse Effect” on the historic property. The components used in the rehabilitation or modification of the bridge must match the historic bridge and be consistent the Historic Columbia River Highway scenic corridor strategy. *The proposed project meets the rehabilitation or modification of historic structure standard.*

4.1.4. (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.

Staff: The bridge is existing thus the location is set and fits the natural topography. No trees are proposed for removal for the proposed project. Additional vegetation screening is not practical for a bridge or needed for the rehabilitation or modification of the historic structures. *This standard is met.*

4.1.5. (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.

Staff: The proposed rehabilitation or modification of the bridge by its structural nature must be bridge components. The project is rehabilitation or modification of historic structures on the National Register of Historic Places when such modification is in compliance with the national register of historic places guidelines. As stated earlier the project was found by SHPO to have

“No Adverse Effect” on the historic property. The components used in the rehabilitation or modification of the bridge must match the historic bridge and be consistent the Historic Columbia River Highway scenic corridor strategy. The conditions will reflect the historic standing of the bridge. *This standard is met.*

- 4.1.6. (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.**

Staff: The project will have no impacts on protect wetlands, riparian corridors, and sensitive plant or wildlife sites. The existing bridge by its nature as a river crossing is in the stream and riparian buffer. There will be a minor amount of earth disturbance while replacing the trestles under the bridge for the walkway at both ends of the bridge, only the west end is in the NSA. There should be no impacts on the listed natural resources. *This criterion is met.*

- 4.1.7. (7) Proposed developments shall not protrude above the line of a bluff, cliff, or skyline as seen from Key Viewing Areas.**

Staff: The existing, historic bridge height will not change. The bridge does not protrude above the line of a bluff, cliff, or skyline as seen from Key Viewing Areas. *This criterion is met.*

- 4.1.8. (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.**

Staff: The bridge will remain below the average tree canopy height of the natural vegetation adjacent to the bridge. *This criterion is met.*

- 4.1.9. (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.**
 - (b) If new landscaping is necessary to meet the required standard, existing on-site vegetative screening and other visibility factors shall be analyzed to determine the extent of new landscaping, and the size of new trees needed to achieve the standard. Any vegetation planted pursuant to this guideline shall be sized to provide sufficient screening to meet the scenic standard within five years or less from the commencement of construction.**
 - (c) Landscaping shall be installed as soon as practicable, and prior to project completion. Applicants and successors in interest for the subject parcel are responsible for the proper maintenance and survival of planted vegetation, and replacement of such vegetation that does not survive.**
 - (d) The Scenic Resources Implementation Handbook shall include recommended species for each landscape set-ting consistent with the Landscape Set-tings Design Guidelines**

in this chapter, and minimum recommended sizes of new trees planted (based on average growth rates expected for recommended species).

Staff: No new vegetation is needed. *This criterion is not applicable.*

- 4.1.10. (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 Scenic Resources Implementation Handbook 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**

Staff: The proposed project qualifies for an “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.” The project was reviewed by the Oregon State Historic Preservation issuing a “concurrence finding” for the ODOT finding that the project would have “No Adverse Effect” on the historic properties for the US30: Sandy River (Troutdale) Bridge Project a property listed in the National Register of Historic Places and a National Historic Landmark. The portion of the walkway that is expanding is the decking with plastic board which the applicant has indicated could meet the Scenic Resources Implementation Handbook color chart. A condition of approval can require the decking to be a dark earthtone color matching the colors in Rows A or B or C 14, C15, or C16. *This standard is met through implementing the Condition.*

- 4.1.11. (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 Scenic Resources Implementation Handbook 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 Implementation Handbook. 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 Implementation Handbook.**

Staff: The location and nature of the components are such that the surface is a minimal area or is located in an area of the bridge that will not result in reflect toward a KVA or the material will be treated to reduce the reflectivity to a meet the low reflectivity standard. A condition of approval can require that all the materials used will meet the low reflectivity standard. A condition of approval can require this criterion be met. *This criterion is met through implementing a condition of approval.*

- 4.1.12. (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.**

Staff: A condition of approval can require this criterion be met. *This criterion is met through implementing a condition of approval.*

4.2. (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):

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

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

(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.

Staff: The project does not include a building. No additional vegetation is needed. *This criterion is not applicable.*

4.3. (C) SMA Requirements for KVA Foregrounds and Scenic Routes

4.3.1. (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.

Staff: The proposed rehabilitation or modification of the bridge by its structural nature must be bridge components. The project is rehabilitation or modification of historic structures on the National Register of Historic Places when such modification is in compliance with the National Register of Historic Places guidelines. As stated earlier the project was found by SHPO to have "No Adverse Effect" on the historic property. The components used in the rehabilitation or modification of the bridge must match the historic bridge and be consistent the Historic Columbia River Highway scenic corridor strategy.

The proposed guard rail with aluminum posts and aluminum horizontal members painted white is designed to mimic the existing guard rail and recommended standard guard rail in the Historic Columbia River Highway scenic corridor strategy which recommendations under # 6. "Use two-rail, wooden guardrail, painted white" for vehicular driving safety.

While the proposed walkway and handrail will be aluminum instead of wood, it will have the appearance of the historic guard railing along the Historic Columbia River Highway and used on sections of the Historic Highway State Trail without the weight stress on the bridge of wooden components. The proposed project meets the rehabilitation or modification of historic structure standard.

4.3.2. (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).

(a) The proposed development shall be designed and sited to meet the applicable scenic standard from the foreground of the subject KVA. If the development cannot meet the standard, findings must be made documenting why the project cannot meet the requirements of 38.7040(A) and why it cannot be redesigned or wholly or partly relocated to meet the scenic standard.

(b) Findings must evaluate the following:

1. The limiting factors to meeting the required scenic standard and/or applicable provisions of 38.7040(A),
 2. Reduction in project size;
 3. Options for alternative sites for all or part of the project, considering parcel configuration and on-site topographic or vegetative screening;
 4. Options for design changes including changing the design shape, configuration, color, height, or texture in order to meet the scenic standard.
- (c) Form, line, color, texture, and design of a proposed development shall be evaluated to ensure that the development blends with its setting as seen from the foreground of key viewing areas:
1. Form and Line-Design of the development shall minimize changes to the form of the natural landscape. Development shall borrow form and line from the landscape setting and blend with the form and line of the landscape setting. Design of the development shall avoid contrasting form and line that unnecessarily call attention to the development.
 2. Color-Color shall be found in the project's surrounding landscape setting. Colors shall be chosen and repeated as needed to provide unity to the whole design.
 3. Texture-Textures borrowed from the landscape setting shall be emphasized in the design of structures. Landscape textures are generally rough, irregular, and complex rather than smooth, regular, and uniform.
 4. Design-Design solutions shall be compatible with the natural scenic quality of the Gorge. Building materials shall be natural or natural appearing. Building materials such as concrete, steel, aluminum, or plastic shall use form, line color and texture to harmonize with the natural environment. Design shall balance all design elements into a harmonious whole, using repetition of elements and blending of elements as necessary.

Staff: The proposed rehabilitation or modification of the bridge by its structural nature must be bridge components and the location is set. The project is rehabilitation or modification of historic structures on the National Register of Historic Places when such modification is in compliance with the National Register of Historic Places guidelines. As stated earlier the project was found by SHPO to have "No Adverse Effect" on the historic property. The components used in the rehabilitation or modification of the bridge must match the historic bridge and be consistent the Historic Columbia River Highway scenic corridor strategy.

The proposed handrail (guardrail) with aluminum posts and aluminum horizontal members painted white is designed to mimic the existing guardrail and recommended standard guard rail in the Historic Columbia River Highway scenic corridor strategy which recommendations under # 6. "Use two-rail, wooden guardrail, painted white" highway guardrails.

While the proposed walkway and handrail will be aluminum instead of wood, it will have the appearance of the historic guard railing along the Historic Columbia River Highway and used on sections of the Historic Highway State Trail without the weight stress on the bridge of wooden components. The proposed project meets the rehabilitation or modification of historic structure standard.

- 4.3.3. (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.).**

Staff: There is significant vegetation adjacent to the eastern bridge head (west side riparian area not in NSA). There will be no vegetation removed for the project. *This standard is met.*

* * *

4.3.4. (5) Development along Interstate 84 and the Historic Columbia River Highway shall be consistent with the scenic corridor strategies developed for these roadways.

Staff: The project is designed to meet the Historic Columbia River Highway scenic corridor strategy. *This standard is met.*

4.4. (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.

Staff: The proposed rehabilitation or modification of the bridge by its structural nature must be bridge components. The project is rehabilitation or modification of historic structures on the National Register of Historic Places when such modification is in compliance with the national register of historic places guidelines. As stated earlier the project was found by SHPO to have “No Adverse Effect” on the historic property. The components used in the rehabilitation or modification of the bridge must match the historic bridge and be consistent the Historic Columbia River Highway scenic corridor strategy.

The new decking material deck will be conditioned to use dark earthtone colors from Scenic Resources Implementation Handbook, Color Chart, Rows A or B or C 14, C15, or C16.

Proposed handrail (guardrail) with aluminum posts and aluminum horizontal members painted white is designed to mimic the existing guardrail and recommended standard guard rail in the Historic Columbia River Highway scenic corridor strategy which recommendations under # 6. “Use two-rail, wooden guardrail, painted white” highway guardrails.

While the proposed walkway and handrail will be aluminum instead of wood, it will have the appearance of the historic guard railing along the Historic Columbia River Highway and used on sections of the Historic Highway State Trail without the weight stress on the bridge of wooden components. *The proposed project meets the rehabilitation or modification of historic structure standard.*

5. SMA Cultural Resource Review.

5.1. MCC 38.7050(A): The cultural resource review criteria shall be deemed satisfied, except MCC 38.7050 (H), if the U.S. Forest Service or Planning Director does not require a cultural resource survey and no comment is received during the comment period provided in MCC 38.0530 (B).

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

Staff: Findings for meeting the procedures of MCC 38.7045 are in the following section of this decision.

5.2. MCC 38.7045(B) The cultural resource review criteria shall be deemed satisfied, except MCC 38.7045 (L) and (M), if:

(1)The project is exempted by MCC 38.7045 (A) (1), no cultural resources are known to exist in the project area, and no substantiated comment is received during the comment period provided in MCC 38.0530 (B).

Staff: Chris Donnermeyer, Heritage Resources Program Manager, Columbia River Gorge National Scenic Area, US Forest Service stated *"I have reviewed the proposed undertaking and area of potential effect as stated on the development review application, against the National Scenic Area records and inventories. These inventories include the cultural resource site inventory maintained by the State Historic Preservation Office. Based upon the information provided in these and the requirements of the Gorge Commission's Land Use Ordinances, it is recommended that:"*

"A Cultural Resource Reconnaissance Survey is: Not Required"

"A Historic Survey is: Required (Complete)" [Exhibit C.1]

* * *

5.3. (3) A historic survey demonstrates that the proposed use would not have an effect on historic buildings or structures because:

(b) The proposed use would not compromise the historic or architectural character of the affected buildings or structures, or compromise features of the site that are important in defining the overall historic character of the affected buildings or structures, as determined by the guidelines and standards in The Secretary of the Interior's Standards for Rehabilitation (U.S. Department of the Interior 1990) and The Secretary of the Interior's Standards for Historic Preservation Projects (U.S. Department of the Interior 1983).

Staff: ODOT submitted an "Oregon Inventory of Historic Place, Section 106 Level of Effect Form to Oregon State Historic Preservation Office (SHPO). The project was reviewed by SHPO which issued a "concurrence finding" for the ODOT finding that the project would have "No Adverse Effect" on the historic properties for the US30: Sandy River (Troutdale) Bridge Project a property listed in the National Register of Historic Places and a National Historic Landmark (Exhibit A.6). A condition of approval will require that the work on the bridge be as described and submitted to SHPO and as approved by SHPO. This standard is met by implementing the condition.

* * *

5.4. (E)(3) The Planning Director shall deem the cultural resource review process complete if no substantiated comment is received during the 30 day comment period and the Reconnaissance or Historic Survey indicate that the proposed use would have no affect on the items listed in subsection (2)(a) through (d) above.

- (a) Cultural resources**
- (b) Archaeological resources**
- (c) Traditional cultural properties**
- (d) Historic buildings or structures**

Staff: The cultural resource review process is complete given the documents provided by Chris Donnermeyer (Exhibit C.1) and the SHPO "No Effect" concurrence letter (Exhibit A.6). No substantiated comment was received during the 30 day comment period. The project meets the standard for the cultural resource review process to be complete. *The cultural resource review process is complete.*

5.5. MCC 38.7045 (L) Cultural Resources Discovered After Construction Begins

The following procedures shall be effected when cultural resources are discovered during construction activities. All survey and evaluation reports and mitigation plans shall be sub-mitted to the Planning Director and SHPO. Indian tribal governments also shall receive a copy of all reports and plans if the cultural re-sources are prehistoric or otherwise associated with Native Americans.

(1) Halt Construction (see Conditions of Approval Number [11] for the list of required procedures if cultural resources are discovered).

(M) Discovery of Human Remains

The following procedures shall be effected when human remains are discovered during a cultural resource survey or during construction.

Human remains means articulated or disarticulated human skeletal remains, bones, or teeth, with or without attendant burial artifacts.

(1) Halt Activities (see Conditions of Approval Number [12] for the list of required procedures if cultural resources are discovered).

Staff: A Conditions of Approval will require the procedures listed under MCC 38.7045 (L) and (M) be followed Cultural Resources Discovered and/or Discovery of Human Remains. *This standard is met through the implementation of the condition.*

6. SMA NATURAL RESOURCES REVIEW

MCC 38.7075: All new developments and land uses shall be evaluated using the following standards to ensure that natural resources are protected from adverse effects. Proposed uses and development within wetlands, streams, ponds, lakes, riparian areas and their buffer zones shall be evaluated for cumulative effects to natural resources and cumulative effects that are ad-verse shall be prohibited. Comments from state and federal agencies shall be carefully considered.

* * *

6.1. (C) Uses that are proposed within 1,000 feet of a sensitive plant shall be reviewed as follows:

(1) Site plans shall be submitted to the Oregon Natural Heritage Program by the Planning Director. The Natural Heritage Program staff will review the site plan and their field survey records. They will identify the precise location of the affected plants and delineate a 200 foot buffer area on the project applicant's site plan.

If the field survey records of the state heritage program are inadequate, the project applicant shall hire a person with recognized expertise in botany or plant ecology to as-certain the precise location of the affected plants.

(2) The rare plant protection process may conclude if the Planning Director, in consultation with the Natural Heritage Program staff, determines that the proposed use would be located outside of a sensitive plant buffer area.

Staff: A review of the Gorge Commission resources maps indicates there are no known sensitive or endangered plants within a 1000 feet of the project. The Oregon Natural Heritage Program successor Oregon Biodiversity Information Center, Institute for Natural Resources, PSU was emailed the submitted application materials and did not respond with any comment. The applicant's Biologic Resources Impact Memo (Exhibit A.7) surveyed for sensitive or endangered plants and found none. The memo found if the project is implemented as proposed there, "will not have an impact on the buffer habitat." *This standards is met.*

* * *

- 6.2. (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/or their buffer zone.**
 - (2) Filling and draining of wetlands shall be prohibited with exceptions related to public safety or restoration/enhancement activities as permitted when all of the following criteria have been met:**
 - (a) A documented public safety hazard exists or a restoration/ enhancement project exists that would benefit the public and is corrected or achieved only by impacting the wetland in question.**
 - (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.**
 - (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.**

Staff: There is no practical alternative, as the bridge crosses the Sandy River. The project does not include filling or draining of wetlands. The project is designed to avoid impacts to the aquatic and riparian areas and their buffer zones. There will be no in-water work. All work is above the ordinary high water line. The applicant states "During the work, there will be a containment system to prevent any above-water work from falling into the river below." The trestle work will not modify the footings.

The application includes a Biological Resource Impact review (Exhibit A.7). The Sandy River provides critical habitat for several species listed under the Endangered Species Act (ESA). These include Chinook, Coho, chum salmon, and steelhead. The applicant states that a containment system (a net like installation) will be installed below the bridge to catch any thing that falls. The report states the project, "will not have an impact on the buffer habitat." If the project is accomplished as proposed, there will be no impact to the river or the fish or significant other habitat. *These standards are met.*

- 6.3. (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.

The applicant’s Biologic Resources Impact Memo (Exhibit A.7) meets the standards. The memo describes measures to protect habitat, which are proposed for the project and conditioned to be implemented by this decision. The memo found if the project is implemented as proposed there, “will not have an impact on the buffer habitat.” *This standard is met.*

- 6.4. (I) The local government shall submit site plans (of proposed uses or development 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).**

Staff: The entire application was submitted 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). No concern was raised about the project. *This standard is met.*

- 6.5. (W) Mitigation plans shall include maps, photo-graphs, 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).**
 - (4) Show how restoration, enhancement, and replacement (creation) measures will be applied to ensure that the proposed use results in minimum feasible impacts to sensitive resources, their buffer zones, and associated habitats.**
 - (5) Show how the proposed restoration, enhancement, or replacement (creation) mitigation measures are NOT alternatives to avoidance. A proposed development/use must first avoid a sensitive resource, and only if this is not possible should restoration, enhancement, or creation be considered as mitigation. In reviewing mitigation plans, the local government, appropriate state agencies, and U.S. Forest Service shall critically examine all proposals to ensure that they are indeed last resort options.**

Staff: The applicant’s Biologic Resources Impact Memo (Exhibit A.7) meets the standards. The memo describes measures to protect habitat, which are proposed for the project and conditioned to be implemented by this decision. The memo found if the project is implemented as proposed the project “will not have an impact on the buffer habitat.” *These standards are met.*

- 6.6. (X) At a minimum, a project applicant shall provide to the local government a progress report every 3-years that documents milestones, successes, problems, and contingency actions. Photographic monitoring stations shall be established and photographs shall be used to monitor all mitigation progress.**

Staff: While this standard requires a mitigation report every three years. This project does not include on-going mitigation, only mitigation during the project to prevent all impacts to the river and to habitat. A condition will require ODOT to verify that the project is meeting the proposed measures to prevent impact that are discussed in the Biologic Resources Impact Memo (Exhibit A.7). *This standard is met through implementing the condition.*

- 6.7. (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.**

Staff: A condition will require ODOT to verify through submitted documents to Multnomah County Land Use Planning and the U.S. Forest Service, NSA Office when the project is complete that the project met the proposed measures to prevent impact that are discussed in the Biologic Resources Impact Memo (Exhibit A.7). If the project failed to meet the plan, that must be reported to the above cited offices as soon as the failure is discovered. *This standard is met through implementing the condition.*

- 6.8. (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:**

Staff: The applicant's Biologic Resources Impact Memo (Exhibit A.7) meets the standards. The memo describes measures to protect habitat, which are proposed for the project and conditioned to be implemented by this decision. The memo found if the project is implemented as propose there, "will not have an impact on the buffer habitat." *This standard is met.*

7. SMA RECREATION RESOURCES

- 7.1. MCC 38.7085(A) The following shall apply to all new developments and land uses:**
(1) New developments and land uses shall be natural resource-based and not displace existing recreational use.

Staff: The proposal is not new development. The project will replace a deteriorating pedestrian walkway bridge crossing of the Sandy River. The walkway will be temporarily closed for the replacement and modification. Any impacts will be temporary. The Recreation Resources standards are met by the project.

8. COMMENTS

8.1. Chris Donnermeyer Letter and Cultural Resources Survey Determination

Chris Donnermeyer, Heritage Resources Program Manager, Columbia River Gorge National Scenic Area, US Forest Service, Columbia River Gorge National Scenic Area, USDA Forest Service, submitted a letter dated April 24, 2019 including a Cultural Resources Survey Determination (Exhibit C.1).

8.2. Steven D. McCoy Letter

Steven D. McCoy, Staff Attorney, Friends of the Columbia Gorge submitted a letter dated May 15, 2019 (Exhibit C.2). The letter addresses application requirements and resource review requirements for Scenic Resources Review, Cultural Resources Review and Natural Resources Review. The letter highlighted cumulative impacts and endangered fish habitat of Sandy River. For Scenic Resources Review findings are in Section 4, Cultural Resources Review findings are in Section 5, and Natural Resources Review findings are in Section 6.

9. CONCLUSION

Based on the findings and other information provided above, the applicant has carried the burden necessary to approve a National Scenic Area Site Review for rehabilitation or modification work on the Sandy River (Troutdale Bridge) in the Gorge Special Open Space Zone in the Special Management Area. This approval is subject to the conditions of approval established in this report.

10. EXHIBITS

‘A’ Applicant’s Exhibits

‘B’ Staff Exhibits

Exhibit #	# of Pages	Description of Exhibit	Date Received/ Submitted
A.1	1	Application Form	1/10/19
A.2	38	Narrative	1/10/19
A.3	1	Applicant’s Appendix A: Aerial photo location of site	1/10/19
A.4	4	Applicant’s Appendix B: Site Plan and bridge elevational drawings	1/10/19
A.5	1	Applicant’s Appendix C: Photo of existing walkway and photo visualization of proposed walkway.	1/10/19
A.6	24	Applicant’s Appendix D::ODOT application for State Historic Preservation Office (SHPO) Section 106 Level of Effect findings. Includes (attached) is letter dated October 29, 2018 by Tracy Schartz. SHPO with a SHPO finding of concurrence with ODOT finding of “No Effect” with SHPO stating “No	1/10/19

		Adverse Effect to the Historic Columbia River Highway and Sandy River (Troutdale) Bridge...”	
A.7	7	Applicant’s Appendix E: Memo titled “Biologic Resources Impact” from Ben While, ODOT Region 1 Biologist and Emma Huston, ODOT Region 1 Environmental Intern	1/10/19
A.8	3	Applicant’s Appendix F: ODOT “ESA Determination of No Effect”	1/10/19
A.9	3	Applicant’s Appendix G: Multnomah County Land Use Planning Pre-financing Conference Summary Notes by Katie Skakel with pages 2 and 4 missing from submitted notes	1/10/19
A.10	4	Applicant’s Appendix H: Key Viewing Areas, US 30 Sandy River Bridge, photos taken from Key Viewing Areas	1/10/19
A.11	6	Applicant’s Appendix I: US 30 Sandy River Bridge “TS&L” (Type, Size and Location) Narrative discussing the bridge’s existing condition work to resolve those issues.	1/10/19
A.12	5	Applicant’s Appendix J: Lighting Analysis	1/10/19
A.13	5	Applicant’s Appendix K: Erosion and Sediment Control Plans	1/10/19
A.14	4	Applicant’s Appendix L: Oregon State Highway Commission and Multnomah County Board of Commissioners Resolutions transferring Highway 30, the Historic Columbia River Highway to the Oregon state highway system and designating it a state highway.	1/10/19
A.15	1	Applicant’s Appendix M: ODOT letter dated December 6, 2018 acknowledging existing Troutdale sewage pipe attached to the bridge and acknowledging it will need to continue to be secured to the bridge.	1/10/19
A.16	1	Applicant’s Appendix N: Sheriff Services Review form complete and signed by Monte Riser, Commander, Multnomah County Sherriff’s Office indicating there will be adequate service available.	1/10/19
A.17	1	Applicant’s Appendix O: Storm Water Certification competed, stamped and signed by David L. McDonald, P.E. indicating no system is needed	1/10/19
A.18	6	Applicant’s Appendix: Oregon Department of State Lands bridge easement (Easement No. 43477-EA	1/10/19
‘B’	#	Staff Exhibits	Date
B		No Staff Exhibits	
‘C’	#	Comments Received	Date
C.1	5	Chris Donnermeyer, Heritage Resources Program Manager, Columbia River Gorge National Scenic Area, US Forest Service letter dated April 24.2019 and Columbia River Gorge	4/24/19

		National Scenic Area, USDA Forest Service, Cultural Resources Survey Determination	
C.2	7	Steven D. McCoy, Staff Attorney, Friends of the Columbia Gorge letter dated May 15, 2019	5/15/19