

SW QUAD MITIGATION PROGRAM

DRAFT COMMENTS (10/97)

COE permit # 9753 (COE) was issued in 92? and DSL permit # 6273 (DSL) was issued 1/20/93. Permits allowed 64 acres of wetland fill. The COE permit says mitigation will be carried out as described in the "Portland International Airport Southwest Quadrant Wetland Mitigation Plan" (Mitigation Plan) dated July 1992. The DSL permit also refers to the Mitigation Plan, and required the Port to develop a Memorandum of Agreement (MOA). This matrix summarized the requirements outlined in the 2 permits, the 1992 Mitigation Plan, and the MOA.

Mitigation Program Elements	Performance Standards	Compliance
GENERAL REQUIREMENTS FOR ALL MITIGATION SITES		
Provide annual mitigation monitoring reports to each of the signatory agencies by November 30th of each year for 5 years. (COE, DSL, MOA)	Reports due every November, to include: bird hazard conditions in SW Quad; progress toward mitigation completion; project success as verified by aerial photos and ground verification; hydraulic condition monitoring. Government Island monitoring to include hydrology, vegetation, and wildlife (4x/yr).	FWS received 1993 & 1995 reports
Initial mitigation project report to be submitted (COE permit required 6 monitoring reports, the 5 annual reports and initial). (COE)	First report to include baseline data and as-builts of all completed constructed mitigation elements including location of trees/shrubs/forbs as planted by species, location of vegetation monitoring transects, and photo points. Report due 60 days after physical mitigation work is completed.	Initial report not submitted to FWS.
In conjunction with the monitoring report submittal, conduct an interagency visit to Jewitt Lake to review mitigation establishment. (MOA)	Annual tours in conjunction with monitoring reports.	Tours have been conducted, but before monitoring reports were available (in '96 & '97).
The Port shall develop an MOA (DSL)	By March 1, 1993, MOA to be developed stipulating the process and objectives including construction, monitoring and protection of mitigation sites and procedure to develop detailed Management Plan. (See DSL permit)	Draft MOA available for review and comment (date?). The Port and all agencies except the COE signed the MOA by June 5, 1995.
Provide protection for the habitat areas created, enhanced, or designated as natural areas. (MOA)	Verification of protection in perpetuity.	Verification not provided.
All areas along the bank disturbed or created by construction activity shall be seeded, sodded, revegetated, or otherwise to protect against erosion (COE)	Disturbed areas should be stabilized so there is no erosion.	No information about stabilization efforts has been provided.
After 5 years, the Port is to conduct a HEP (or other agreed to evaluation) on Government Island to compare actual conditions with reaching original HEP assumptions and submit a "habitat evaluation" report. (COE, DSL)	Report due in 1998, to include HEP comparison, summary of monitoring reports, evaluation of mitigation project effectiveness, and identification of unmet mitigation needs. Unmet mitigation needs and contingency management measures or actions are to be identified.	Due in 1998. Port should commit a budget, timeline, and responsible party to meet deadline.
GOVERNMENT ISLAND		
Develop Government Island Management Plan that will address wildlife management, public use and access, grazing management, monitoring of use, and implementation responsibilities. Plan will be update of '82 plan, and will outline procedures to manage the wetland mitigation area in a manner that promotes wetland values and will not allow other uses of the area that substantially impair those values. (DSL, MOA)	Within 90 days of signed MOA (Port notes say 6/95, all signed but COE), the Port shall develop and distribute a draft mgmt plan, allow 45 days for agency review, and finalize.	Draft plan (dated 4/96) was sent to agencies 7/11/96. Port/agency meeting to discuss draft plan 8/27/96. Port meeting notes (11/20/96) said Port would put together process and timeline for development of the Mgmt Plan, w/section for mitigation area separate from veg/habitat element. Nothing received yet.

Construct water control and fish exclusion structure (Mitigation Plan)	Allow Columbia River water to fill the lake to elevation 15ft and retain water at or below this elevation; prevent entrapment of juvenile salmonids	Installed 11/93. According to '95 monitoring report (p.5), the dam will only "maintain" (hold when full?) water up to 14.7 feet.
A. Create up to 10 acres of wetland to ensure a total of 40 acres of wetland within Jewitt Lake. Design to be undertaken by Spring 1995. If design phase shows excavation is not feasible, the Port will propose an alternate site for review and comment. Implementation to take place late 1995-96. (MOA)	10 acres of wetland should be created at Jewitt Lake or an alternate site.	Nothing has been done; the Port says waiting to see what HEP tells us. However, the MOA does not say creation of the 10 acres is contingent upon the HEP results.
Cattle fencing around Jewitt Lake should be 200' from wetland edge (Mitigation Plan & blueprint)	Fence is to be 200' from wetland edge.	Unknown
In-water habitat structure to be installed. (Mitigation Plan p.9)	Logs and other woody debiris to be achored on the sunny side of Jewitt Lake.	Unknown
Deepen channel between Jewitt Lake and small lake to east. (Mitigation Plan)	same as 10 acre enhancement?	Unknown
ELROD SITE		
Install 10 acres native riparian and/or wooded wetland to enhance wildlife habitat surrounding future Elrod water quality facility. (COE) Riparian community of deciduous/coniferous canopy with a shrub understory. (Mitig plan & maps) MOA says detailed location and design were approved by agencies in 1/94 & planting scheduled for fall and winter '94.	Create linkage/connectivity to existing natural areas in Columbia South Shore by restoring riparian community.	No. As built never provided; field observations revealed plantings were unsuccessful. COE permit says prior to creation, design details to be provided to COE for review & approval, to be coordinated w/other agencies.
BUFFALO SITE		
Install native plants (riparian and/or wooded wetland) to enhance wildlife habitat at 19 acre Buffalo Street site. (COE) MOA says detailed location and design were approved by agencies in 1/94 & planting scheduled for fall and winter '94.	Create linkage/connectivity to existing natural areas in Columbia South Shore by restoring riparian community.	No. As built never provided; field observations revealed plantings were unsuccessful; horses impacting site.
Banks will be cut back to 2.5:1 to 4:1 to provide for trees and shrubs such as willow, ninebark, red-osier dogwood and elderberry. Selection of riparian species similar to those at Elrod will be planted. (Mitig Plan)	All banks within site should be 2.5:1 to 4:1	Some grading shown on '94 Buffalo mitigation plan. Unknown whether graded. Unknown whether other areas not on plan should have been graded.
Construct water quality facilities at Elrod, scheduled for implementation in conjunction with development of SW quad fill. When development is initiated, design of facilities will be coordinated with the City of Portland and DEQ. Agencies to be notified prior to construction. (MOA)	To City of Portland and DEQ standards.	Not built yet; will be built as development occurs. ("May be delayed for several years" p.4 MOA)

SW QUAD MITIGATION PROGRAM

DRAFT COMMENTS (10/97)

COE permit # 9753 issued in 92? and DSL permit # 6273 issued 1/20/93. Final signature on agreement from all agencies except the Corps June 5, 1995. Permits allowed 64 acres of wetland fill.

Mitigation Program Elements	Performance Standards	Compliance	Task	Notes
GENERAL REQUIREMENTS FOR ALL MITIGATION SITES				
Provide annual mitigation monitoring reports to each of the signatory agencies by November 30 th of each year.	Annual monitoring report to each signatory agency every November. Reports to include: bird hazard conditions in SW Quad; progress toward mitigation completion; project success as verified by aerial photos and ground verification; hydraulic condition monitoring	FWS received 1993 & 1995 reports		
In conjunction with the monitoring report submittal, conduct an interagency visit to Jewitt Lake to review mitigation establishment.	Annual tours in conjunction with monitoring reports.	Tour s have been conducted before monitoring reports were available.		
Provide "as built" drawings of all completed construction of mitigation elements.	"As builds" for each mitigation element within 1 year of construction.	No "as builds" have been provided.		
Provide protection for the habitat areas created, enhanced, or designated as natural areas.	Evidence of protection in perpetuity.	Evidence not provided.		
All areas along the bank disturbed or created by construction activity shall be seeded, sodded, revegetated, or other to protect against erosion (permit 9753)	Disturbed areas should be stabilized so there is no erosion.	No information about performance of any stabilization efforts has been provided.		

Mitigation Program Elements	Performance Standards	Compliance	Task	Notes
GOVERNMENT ISLAND				
Develop Government Island Management Plan that will address wildlife management, public use and access, grazing management, monitoring of use, and implementation responsibilities. Plan will be update of '82 plan, and will outline procedures to manage the wetland mitigation area in a manner that promotes wetland values and will not allow other uses of the area that substantially impair those values.	By 4/94 the Port shall develop and distribute in 4/94 a draft mgmt plan; allow 45 days for agency review; and finalize.	Draft plan (4/96) sent to agencies 7/11/96. Port/agency meeting to discuss draft plan 8/27/96. Port meeting notes (11/20/96) said Port would put together process and timeline for developing a Mgmt Plan, w/section for mitigation area separate from veg/habitat element.		
A. Government Island - construct water control and fish exclusion structure	Allow Columbia River water to fill the lake to elevation 15ft and retain water at or below this elevation; prevent entrapment of juvenile salmonids	Installed 11/93. According to '95 monitoring report (p.5), the dam will only "maintain" (hold?) water up to 14.7 feet.		
A. Create up to 10 acres of wetland to ensure a total of 40 acres of wetland within Jewitt Lake. (Spring 1995) Design phase will investigate the appropriate method. If excavation is not feasible, the Port will propose an alternative site for review and comment. On site enhancement will take place in late 95 and 96.	10 acres of wetland should be created at Jewitt Lake or an alternate site.	Nothing has been done; the Port says waiting to see what HEP tells us. However, the 10 acres is to be created regardless of HEP results.		
Cattle fencing around Jewitt Lake should be 200' from wetland edge (according to mitigation map)	Fence is to be 200' from wetland edge.	Unknown		
In water habitat structure to be installed. (Mitigation plan p .9)	Logs and other woody debiris to be achored on the sunny side of Jewit Lake.	Unknown		

Mitigation Program Elements	Performance Standards	Compliance	Task	Notes
Mitig plan calls for deepening channel between Jewitt Lake and small lake to east.	?			
ELROD SITE				
B. Install native plants to enhance wildlife habitat. 10 acres surrounding future Elrod water quality facility. Riparian and/or wooded wetland (9753) Riparian community of deciduous/coniferous canopy with a shrub understory. (Mitig plan)	Create linkage or connectivity of existing natural areas in Columbia South Shore by restoring riparian community.	No. As built never provided; field observations revealed plantings were unsuccessful.		
BUFFALO SITE				
B. Install native plants to enhance wildlife habitat. 19 acre Buffalo Street site. (Detailed location and design were approved by agencies in 1/94 & planting scheduled for fall and winter 94. Riparian and/or wooded wetland (9753)	Create linkage or connectivity of existing natural areas in Columbia South Shore by restoring riparian community.	No. As built never provided; field observations revealed plantings were unsuccessful.		
Banks will be cut back to 1:2.5 to 1:4 to provide for trees and shrubs such as willow, ninebark, red-osier dogwood and elderberry. Selection of riparian species similar to those at Elrod will be planted.	All banks should be 1:2.5 to 1:4	Some grading shown on Buffalo mitigation plan. Unknown whether graded. Unknown whether other areas should have been graded.		
C. Construct water quality facilities at Elrod, scheduled for implementation in conjunction with development of SW quad fill. When development is initiated, design of facilities coord. W/City and DEQ.	To City of Portland and DEQ standards.	Not built yet; will be built as development occurs.		

Mitigation Program Elements	Performance Standards	Compliance	Task	Notes
NOTES, COMMENTS AND QUESTIONS				
How do actual water depths compare to HEP assumptions?	After 5 years/in 1998, the Port will prepare a "habitat evaluation" report which identifies any unmet needs and actions needed to correct.			
At the end of 5 years, the Port shall also (besides the HEP) summarize monitoring reports to evaluate mitigation project effectiveness, identify unmet mitigation needs, and implement a contingency plan if needed.				
By March 1, 1993, the Port shall develop a MOA stipulating the process and objectives including construction, monitoring and protection of mitigation sites; procedure to develop detailed Management Plan.				
Gov't island monitoring of hydrology, vegetation, wildlife (4x/yr), and wildlife at Jewitt Lk.				
Corps permit requires that 6 monitoring reports be submitted. The first report was to include baseline and as-builts to show location of planted veg, transects, and photo points, and was due 60 days after mitigation work complete. After that, reports were due every November.				