

and the lakes will return to being naturally influenced by the hydrological dynamics of forces and seasonal flooding. Therefore, this objective is met.

4. Implement a monitoring program to assure early detection of potential environmental problems, and to quantify management programs.

Findings: The applicant states that a monitoring program is in place, but no formal monitoring/maintenance plan has been submitted to meet this objective. Therefore, in order to meet this objective a formal annual monitoring program must be established.

The industry standard for monitoring mitigation plantings, restoration plantings, and resource enhancement plantings is to assess "success" of the project through the use of performance standards. The performance standard for survival of mitigation plantings provided in the Portland Zoning Code (33.248.090) is 100 percent survival: all plants that die must be replaced in kind. Another common performance standard is the measured spatial coverage of native species; especially in an area previously covered by invasive species, such as this site. By estimating the amount of cover occupied by native species, the success of the project can be better evaluated. Maintaining plant survival so that 80 percent of the planted area is covered in native vegetation is a sufficient standard in this case. As noted in the findings for criterion b, below, it is appropriate for ground covers on turtle nesting grounds to be maintained at 20 to 30 percent cover, to encourage nesting.

A watering schedule is required to take into consideration the variable rainfall trends we have here, in the Portland metropolitan area, from year to year. A dry year will necessitate more frequent watering to ensure plant survival. With conditions related to additional monitoring requirements, beyond those proposed in the application, this criterion can be met.

Conditions of approval necessary to assure mitigation and monitoring success are:

- One annual count during the late summer for three summers after planting to determine the rate of tree, shrub, and groundcover mortality for that year.
- A **100 percent** survival rate for woody species (trees and shrubs) must be documented at the time of each annual report, and in the final monitoring report. Trees and shrubs planted as part of the mitigation plan that do not survive must be replaced.
- All seeded areas and ground covers, outside of turtle nesting areas, planted as part of the approved mitigation plan must survive to achieve at least 80 percent coverage of the mitigation area after three years. Seeded areas in nesting areas (the north mitigation site, and within 30 feet of the Ordinary High Water Level at the water control structure) must achieve 20 to 30 percent coverage after 3 years.
- Photographs of the mitigation area must be taken during the annual visits and a site plan must show where and what direction these photos will be taken.
- A water schedule must be submitted for trees, shrubs, and groundcovers for the first two summers after planting.
- Explain what means of identification on plantings will be used for the final Site Development permit inspection.
- Provide the contact name, number, and address of the responsibly party for the monitoring and maintenance of the site.

In order to ensure early detection of potential problems due to future plant mortality, the applicant proposes to conduct monitoring and maintenance of the required mitigation plantings for a minimum of three years.

With a condition requiring the applicant to submit a formal monitoring and maintenance plan with the elements above, this objective can be met.

5. Provide access to Smith and Bybee Lakes, which supports appropriate types and levels of recreation.

Findings: According to the Smith and Bybee Lakes NRMP (Figure 5), this site is not identified as a water access point to the lakes. The proposed project is designated in the Smith and Bybee Lakes