



# Coyote Wall Trail Realignments and Decommissioning

Klickitat County, Washington

## CONSISTENCY DETERMINATION (CD-22-03-S)

### BACKGROUND

The proposed project involves realignment and construction of 2.6 miles of the Coyote Wall Trail, which would be located and designed to provide a more sustainable route and improve visitor experience (Figure 1). The project would also include decommissioning of 1.8 miles of poorly designed legacy trails to protect natural resources. The Forest Service has received Great American Outdoor Act funding to complete this work. We have engaged with partners in the mountain biking and hiking communities to layout the proposed realignments and plan to do the trail construction and decommissioning through a combination of contracted work and volunteer work.

Coyote Wall is a signature trail showcasing the Scenic Area's views and topography. The 2009 Coyote Wall, Burdoin Mountain, and Catherine Creek Area Recreation Plan (hereafter referred to as Recreation Plan) identified the need to redesign and reconstruct the existing trail system to meet Forest Service standards and protect sensitive resources. It specifically required trails within the Coyote Wall planning area to "respect open space values and minimize disturbance to sensitive areas". The Recreation Plan also called for the use of educational and interpretive signage to keep recreationists informed. The desired condition for the project area allowed for medium to high density of trail development with trails located to avoid adverse impacts to cultural and other sensitive areas such as talus, cliff faces, and oak savannas.

There is growing demand for mountain biking opportunities in the Pacific Northwest and opportunities within the Columbia River Gorge are limited. Current levels of use at Coyote Wall, combined with the existing trail design and layout, which does not meet Forest Service standards, is resulting in adverse impacts to natural resources, particularly with regard to botanical and soil health. However, users have few alternatives for mountain biking within the Columbia River Gorge National Scenic Area. Of the 194 miles of National Forest System (NFS) trails in the Scenic Area, 37 miles are open to bicycles, and only 19 miles of trail are designed and managed for bicycle use. Coyote Wall Trail is one of the few trails managed for bicycle use and appeals to riders looking for an intermediate difficulty level with expansive views of the Gorge. The proposed project would significantly improve the sustainability of trails in the area while simultaneously providing enhanced biking opportunities in this popular area.



## DECISION

I find that the above proposal is consistent with the Management Plan for the Columbia River Gorge National Scenic Area (CRGNSA) if it is implemented as described in the application materials, the CRGNSA Consistency Determination and Findings of Fact referenced as CD-22-03-S, and provided the following conditions are applied:

- Where trail is visible from SR14, Columbia River, I84, and HCRH, maximize existing topography and disguise cut/fill to maximum extent possible
- Where trail is visible from SR14, Columbia River, I84, and HCRH, ensure the depth of the trail cut banks be as minimal as possible while maintaining sustainable trail construction.
- Any temporary signage should be non-reflective, low to the ground, and compatible with the landscape setting.
- Soils removed during construction to be scattered broadly both above and below the trail to minimize the visibility of removed soils. If removed soils will completely cover existing vegetation, soils will be removed from the site to an alternate location.
- Provide status report of planting success for 2 years following project completion.
- If cultural resources are discovered during project construction, work must stop until the resources can be evaluated by the Forest Service's Heritage Resource Program Manager.
- Conduct monitoring for peregrine falcon and other sensitive wildlife prior to construction and/or decommissioning activities that occur between February 1<sup>st</sup> and July 15<sup>th</sup>.
- Consult with the agency Wildlife Biologist if conducting trail construction or decommissioning activities between December 1 and March 1, to protect winter wildlife range.

## ADMINISTRATIVE REVIEW (APPEAL) OPPORTUNITIES

A written request for review of the National Scenic Area Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Forest Supervisor signature below. Requests for review should be addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208. An electronic copy of the request should be provided to the USFS-CRGNSA Office at 902 Wasco Street, Suite 200, Hood River, Oregon 97031, ATTN Appeals, and/or emailed to [appeals-pacificnorthwest-columbia-river-gorge-nsa@usda.gov](mailto:appeals-pacificnorthwest-columbia-river-gorge-nsa@usda.gov).

## IMPLEMENTATION DATE

This project may begin immediately after the date on this decision. Project implementation must comply with the conditions of approval described above. The Consistency Determination expires two years after the date on this determination. If implementation has not commenced before that date, a new consistency review or request for extension shall be required.



## CONTACT

For additional information concerning this decision, contact: Aiden Forsi, NEPA Planner, 541-645-3648 or [Aiden.Forsi@usda.gov](mailto:Aiden.Forsi@usda.gov).

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DONNA MICKLEY  
Forest Supervisor  
Columbia River Gorge National Scenic Area

DATE



# CRGNSA Consistency Determination Coyote Wall Trail Realignments and Decommissioning

**CD-22-03-S**

## Columbia River Gorge National Scenic Area

**Parcel/Tax Lot #03112700001400 (10 acres), #03112753000200 (5 acres),  
#03112753000100 (5 acres), #03112752000300 (5 acres),  
#03112700001900 (20 acres), #03112700002000 (20 acres),  
#03112600001500 (20 acres), #03112600001600 (20 acres),  
#03113500000500 (80 acres)**

**Klickitat County, Washington  
December 18, 2023**

### Findings Of Fact

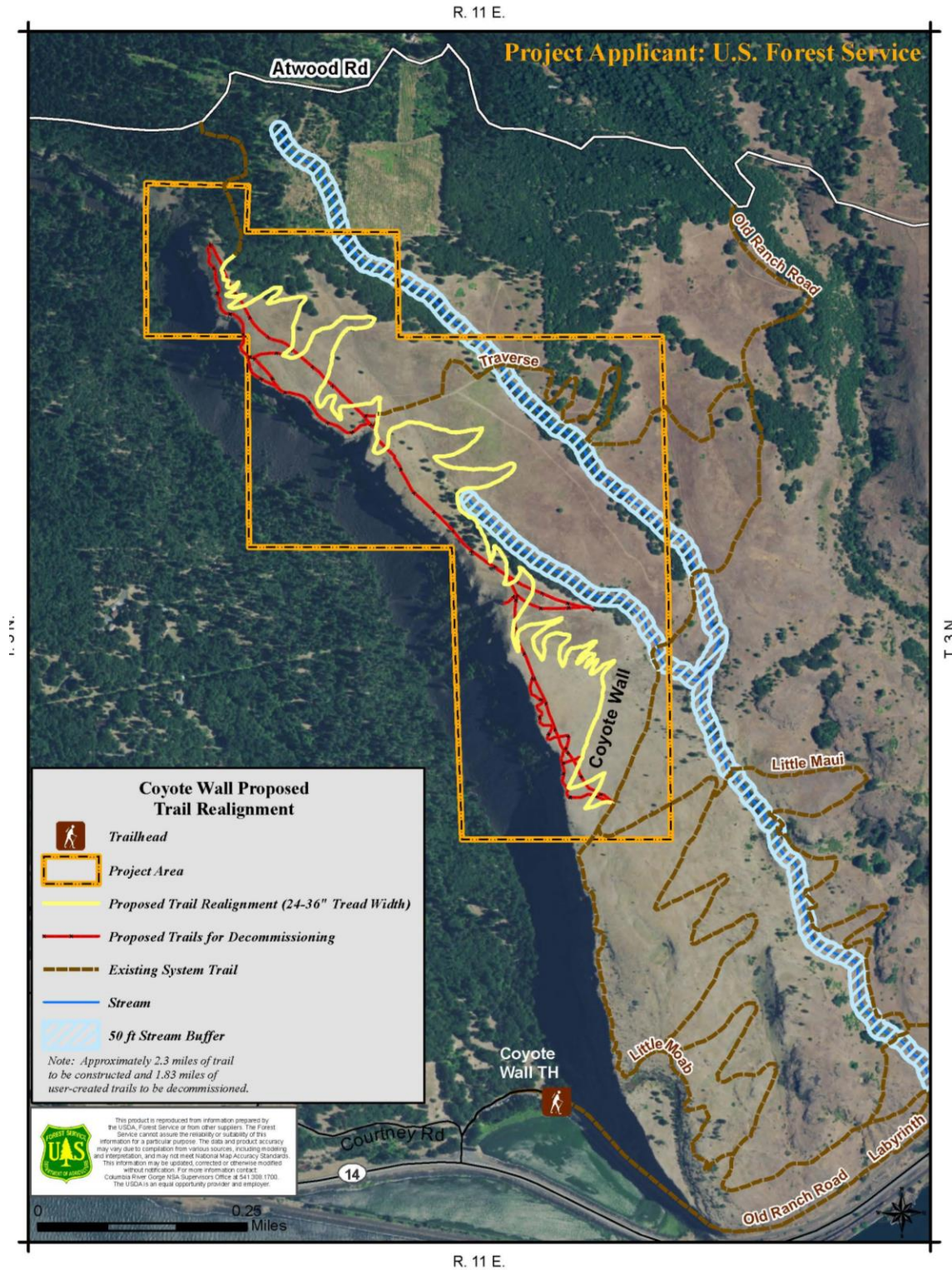
LANDOWNER:	<b>USDA Forest Service, Columbia River Gorge National Scenic Area</b>
APPLICANT:	<b>USDA Forest Service, Columbia River Gorge National Scenic Area</b>
PROPOSED ACTION:	<b>The proposed project involves realignment and construction of 2.3 miles of the Coyote Wall Trail, which would be located and designed to provide a more sustainable route and improve visitor experience (Figure 1). The project would also include decommissioning of 1.8 miles of poorly designed legacy trails to protect natural resources.</b>
LOCATION:	<b>T03N R11E Sections 26, 27, 35</b>
NATIONAL SCENIC AREA DESIGNATION:	<b>Special Management Area (SMA)</b>
LAND USE DESIGNATION:	<b>Most of the project area is within lands designated as Special Management Area (SMA) Agriculture (119 acres and 2.13 miles proposed trail realignment). Small portion of the project area along the top of Coyote Wall cliff are within lands designated as SMA Open Space (49 acres and 0.17 miles of proposed trail realignment).</b>
LANDSCAPE SETTING	<b>Oak Woodlands</b>

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as adopted in 2020, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in regular type. The findings are displayed in **bold type**.



# Project Site Plan

## Figure 1. Coyote Wall Site Plan





## Public Comment

A notice describing the project was sent to a mailing list of known interested parties and adjacent landowners on April 5, 2022. A period of 30 days was allowed for public comment. The following comments were received:

Friends of the Columbia River Gorge commented regarding the use of the CRGNSA Management Plan for consistency determinations as concurred upon by the Secretary of Agriculture in February 2021. Their comment also included CRGNSA Management Plan requirements for the Scenic, Natural, Cultural, and Recreation resources specific to this project.

*Response: As of June 2022, the CRGNSA has begun implementing the CRGNSA Management Plan as concurred upon by the Secretary of Agriculture. The guidelines in this document reflect the guidelines in the most current version of the management plan. The Consistency Determination and Findings of Fact document the project's compliance with relevant requirements and guidelines of the CRGNSA Management Plan.*

## Project Proposal

The proposed project involves realignment and construction of 2.6 miles of the Coyote Wall Trail, which would be located and designed to provide a more sustainable route and improve visitor experience (Figure 1). The project would also include decommissioning of 1.8 miles of poorly designed legacy trails to protect natural resources. The Forest Service has received Great American Outdoor Act funding to complete this work. We have engaged with partners in the mountain biking and hiking communities to layout the proposed realignments and plan to do the trail construction and decommissioning through a combination of contracted work and volunteer work.

The proposed project is consistent with the Decision Notice and Finding of No Significant Impact for the 2011 Burdoin Mountain, Coyote Wall, Catherine Creek Area Recreation Plan (“Recreation Plan”). When the Forest Service acquired the lands within the project area, a network of poorly designed user-created trails already existed and has since continued to expand. The project area contains several rare plants and provides habitat for sensitive wildlife species. As demand has grown for biking and hiking opportunities, existing trails continue to widen and erode with impacts to natural resources, scenic quality as seen from Key Viewing Areas, and visitor experience.

Coyote Wall is a signature trail showcasing the Scenic Area’s views and topography. The Recreation Plan identified the need to redesign and reconstruct the existing trail system to meet Forest Service standards and protect sensitive resources. It specifically said that trails within the Coyote Wall planning area would be routed to “respect open space values” and minimize disturbance to sensitive areas. The Recreation Plan also called for the use of educational and interpretive signage. The desired condition for the project area allowed for medium to high density of trail development with trails located to avoid adverse impacts to cultural and other sensitive areas such as talus, cliff faces, and oak savannas.

There is growing demand for mountain biking opportunities in the Pacific Northwest and opportunities within the Columbia River Gorge are limited. Of the 194 miles of National Forest System (NFS) trails in the Scenic Area, 37 miles are open to bicycles, and only 19 miles of trail are designed and managed for bicycle use. Coyote Wall Trail is one of the few trails designed and managed for bicycle use and appeals



to riders looking for an intermediate difficulty level with expansive views of the Gorge. The proposed project would improve biking opportunities in this popular area.

**Table 1. Trail Class 2 Standards**

Metric	Category	Design Standard
Constructed Tread Width	Single Track	24” – 36”
Anticipated Active Tread Width	Single Track	12” – 24”
Surface	Type	Native, with limited grading. Frequently rough.
	Protrusions	≤ 6”; protrusions may be common and continuous
	Obstacles	12”
Grade	Target Grade	5% - 12%
	Short Pitch Maximum	25% (35% on downhill segments)
	Maximum Pitch Density	10% - 30% of trail

**Trail Realignment: Design and Layout**

Realigned trails would be designed and constructed to meet the guidelines for Class 2 Trail (Table 1) with natural surfacing and features. The trail would be designed to reduce downhill speeds, with a series of stacked berms that connect rough, rocky trail segments with maximum sight lines. Switchbacks would be used to lower trail grades in such a manner that curves do not add to erosion potential through skidding. Tread would generally be of high surface roughness and narrow in finished width. Location-specific design elements including tread width, surface, and grade, would be determined based on soils, hydrological conditions, anticipated use levels, erosion potential, and other factors influencing surface stability and overall trail sustainability. Generally, the proposed trails would be singletrack (where users must travel in single file) and vary from 24- to 36- inches wide.

The proposed realignments were developed in the field in consultation with the Forest Service botanist and wildlife biologist to ensure resource protection. The Forest Service also partnered with local mountain biking and hiking organizations to ensure trail layout and design would provide a high-quality visitor experience. Existing trails are poorly placed along the fall line causing significant drainage problems, erosion, and trail widening. Emphasis will be on constructing a sustainable route and restoring impacted areas.

The proposed system of trails will be designed to be ecologically sustainable and resist erosion. Rolling contour trails will traverse hills and side slopes and be characterized by gentle grades, frequent grade





reversals, and gently out sloping tread. These design features will minimize erosion by allowing water to drain in a gentle, non-erosive manner called sheet flow.

The final trail layout will be sited to use existing natural topography to achieve visual subordination from key viewing areas. Trail width and cut bank depth will be minimized to the extent possible while meeting sustainable design and visitor experience objectives. For portions within the Open Space Land Use Designation (along the top of the Coyote Wall cliffs), extra effort will be taken to minimize trail width and cut bank depth to maintain visual subordination. All existing trees will be retained during trail construction.

New trails will be constructed using a trail-specific backhoe or mini-dozer and hand tools. All equipment will be washed before entering the project area to reduce the risk of transfer or spread of invasive plants. For trail construction or decommissioning activities that will occur between February 1 and July 15 monitoring for peregrine falcon and other sensitive wildlife will be conducted. If active nests are discovered during this monitoring, there will be no use of motorized/mechanized equipment greater than 90 decibels within 300 feet of cliff's edge or 500 ft of groundnests until July 15. To reduce impacts to winter wildlife range and soils, no mechanized/motorized work will occur Dec 1- March 1, unless approved by the Forest Service wildlife biologist. All disturbed areas will be seeded with an east-side grass and forb seed mix approved by the Forest Service botanist. Planting will occur in the fall for best results.

### Trail Decommissioning

The proposed project will involve decommissioning 1.8 miles of poorly designed user-created trails (Figure 1). Decommissioning and restoring trails in the Coyote Wall will be challenging given the poor soils, dry growing season, high use levels, and existing visitor use patterns. However, the Forest Service has successfully worked with partners to decommission trails in the vicinity of the project area in the past. Trail construction will occur prior to trail decommissioning.

For portions of the trail to be decommissioned, the first step will be to grade the entrenched trails to match the normal grade of the slope to the maximum extent practicable. This will be accomplished by hand or drag harrowing the steep sides of the trail. In areas where it is practicable, the soil will be scarified to a depth of two to six inches, using excavators not exceeding 10,000lbs GVWR or other heavy equipment, except during wildlife exclusion periods noted above. Other less intensive methods like hand tilling may occur where scarification is desired but access for machinery is limited. Scarification will increase the soil's capacity to absorb moisture while providing a bed for wind deposited and hand scattered seeds. The second step will be to identify key drainage points and install drainage features (e.g., dips and water bars) to stop erosion. Large rocks will then be planted in the trail bed to slow water movement and disguise user-created routes. Rocks would be partially buried and placed perpendicular to the fall line. Fill material will be placed around the rocks and tamped down to make them appear natural. Placement of these rocks is expected to discourage the use of the decommissioned trails and allow for the collection and storage of water for newly establishing plants. Rocks will be sourced from within the project area and borrow pits will be inspected and approved by Forest Service botanist prior to implementation.

If needed, additional fill will be used to reduce gullying in highly eroded areas and help with soil development and vegetation establishment. Fill will be sourced from the trail construction activities (within project area) to reduce the potential for introduction and spread of non-native invasive plants from





outside of project area. Locally-sourced large debris would then be scattered sporadically over the decommissioned routes to add roughness and provide shade and cover for seed and seedlings. All trail decommissioning activities will be subject to the seasonal restrictions for peregrine falcon nesting and winter range habitat described in the Trail Construction section.

During review, Forest Service staff determined that the roadscar section of the trail to be decommissioned would require a different approach. This is because continued use of the trail following decommissioning is expected, and the use of that the existing trail is also preferred to limit the establishment of other damaging user-created trails in the area. First, drainage will be cut into the roadscar using heavy machinery. The roadscar will then be narrowed to a width of two feet by placing rocks to funnel use into a defined channel, with wattles installed where necessary to act as guardrails to keep users on the trail. In areas to be restored, the soil will be scarified using excavators or hand tools as described above. Scarified soil will be covered with straw or wood fiber and then seeded with an approved east-side grass and forb seed mix. On steeper sections of the decommissioned and restored trail, jute netting will be installed to soften the visual appearance of the trail as visible from Key Viewing Areas and to protect revegetated areas.

Special care will be given to disguising the portions of decommissioned trails near junctions with realigned trails and existing trails that will remain open for use. If users can see the decommissioned trails, they will be more likely to continue using them. Temporary signage may also be used to notify the public that decommissioned trails are closed for restoration. The Forest Service will work with our partners to monitor decommissioned trails, perform additional restoration work as needed, and expand education and outreach efforts to promote responsible recreation in the Coyote Wall area. The Forest Service will coordinate with the Washington Trails Association to amplify social media messaging in the hiking and biking community related to trail etiquette and the importance of staying on the established trail and allowing decommissioned areas to recover.

### Restoration of Disturbed Areas

Areas disturbed during trail construction and decommissioning will be seeded with an east-side grass and forb seed mix approved by the Forest Service botanist. Seeding will occur in the fall for best results. All equipment used for trail construction and decommissioning will be cleaned to prior to accessing project area. Seeded areas will be monitored and reseeded as needed.

## Land Use Designation

*The Management Plan, Part II, Chapter 1: Agricultural Land, SMA Provisions, Review Uses, states:*

1. The following uses may be allowed on lands designated Agriculture subject to review for compliance with the scenic, cultural, natural, and recreation resource guidelines. The use or development shall be sited to minimize the loss of land suitable for the production of agricultural crops or livestock.

T. Public recreation, commercial recreation, interpretive, and educational developments and uses, consistent with the guidelines in Part I, Chapter 4: Recreation Resources.

**Finding: The proposed new trail is considered a “very low intensity” use in the Management Plan, characterized as predominately natural or natural appearing features and limited development. Soils removed for trail construction will primarily be used in trail decommissioning, or scattered on the landscape, meaning they will remain available for future agricultural uses. The project will not**



cause a loss of land suitable for the production of agricultural crops or livestock. This project qualifies as review use 1.T for the Agricultural Land Use Designation. Consistency with Part I, Chapter 4: Recreation Resources guidelines can be found in the Recreation Resources section of this document.

*The Management Plan, Part II, Chapter 3 (Open Space), SMA Provisions, Review Uses, states:*

1. An Open Space plan shall be completed by the primary managing agency or landowner prior to any new land uses or development and shall be reviewed by the Forest Service. The Open Space plan shall include the following:

- A. Direction for resource protection, enhancement, and management.
- B. Review of existing uses to determine compatibility with Open Space values.
- C. Consultation with members of the public and with agency and resource specialists.

**Finding: This project is consistent with the Watershed Analysis of the Catherine-Major Creek Area, which was developed to “fulfill the requirements for the Open Space Plan in those areas designated Open Space in the Columbia River Gorge National Scenic Area Management Plan.”**

Two goals of the *Watershed Analysis of the Catherine-Major Creek Area* are to direct recreation use in the Catherine Creek area to one "intensive" recreation node in a less sensitive area and manage and direct recreation use in highly popular and moderately-highly sensitive areas to meet expected demand while minimizing resource damage. This project focuses on achieving these goals outlined in the Open Space plan.

2. The following new uses may be allowed on lands designated Open Space subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines:

- C. Low-intensity recreation uses and developments, including educational and interpretive facilities, consistent with Part I, Chapter 4: Recreation Resources.

**Finding: The proposed activities are consistent with the existing use of Coyote Wall and consistent with Review Use 2.C. listed above for low intensity recreation uses and developments. Consistency with Part I, Chapter 4: Recreation Resources guidelines can be found in the Recreation Resources section of this document.**

## Scenic Resources

### SMA Design Guidelines Based on Landscape Settings

**Finding: The site is within the Oak-Pine Woodland Landscape Setting. Guidelines for Pastoral, Residential, River Bottomlands, and Gorge Walls, Canyonlands, and Wildlands do not apply.**

1. The following guidelines apply to all lands within SMA landscape settings regardless of visibility from KVAs (includes areas visible from KVAs as well as areas not visible from KVAs):

- B. Coniferous Woodland and Oak-Pine Woodland: Woodland areas shall retain the overall appearance of a woodland landscape. New development and land uses shall retain the overall



visual character of the natural appearance of the Coniferous Woodland and Oak-Pine Woodland landscape.

- (1) Buildings designed to have a vertical overall appearance in the Coniferous Woodland landscape setting and a horizontal overall appearance in the Oak-Pine Woodland landscape setting shall be encouraged.
- (2) Use of plant species native to the landscape setting. Examples of native species are identified in the Scenic Implementation Handbook as appropriate to the area shall be encouraged. Where non-native plants are used, they shall have native-appearing characteristics.

**Finding: No buildings are proposed. Project components associated with decommissioning trail have design criteria demonstrating actions to return the area to a natural appearing state, including the installation of boulders, recontouring, and selective seeding and planting with native grasses and forbs. Areas where new trail would be constructed would not dominate the surrounding natural landscape and be sited to retain natural topography to the greatest extent practicable.**

SMA Guidelines for Development and Uses Visible from KVAs

1. The guidelines in this section shall apply to proposed development on sites topographically visible from key viewing areas.

**Finding: The landscape is topographically visible from the following Key Viewing Areas:**

KVA	FOREGROUND	MIDDLEGROUND	BACKGROUND
SR14		X (~0.6 miles)	
I84		X (~1.50 miles)	
HCRH		X (~1.60 miles)	
Columbia River		X (~0.66 miles)	
Old Hwy 8		X (~1.30mi)	
Rowena Plateau			X (~5.20mi)
Tom McCall			X (~5.41mi)

2. New development and land uses shall be evaluated to ensure that the required 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.

**Finding: Guidelines 3-15 of this section evaluate the project to ensure that scenic resources are not adversely affected, based on the degree of visibility from Key Viewing Areas. Cumulative effects are addressed in Guideline 6.**

3. The required SMA scenic standards for all development and uses are summarized in the following table:



LANDSCAPE SETTING	LAND USE DESIGNATION	SCENIC STANDARD
<b>Coniferous Woodland, Oak-Pine Woodland</b>	<b>Forest (National Forest Lands), Open Space</b>	<b>Not Visually Evident</b>
River Bottomlands	Open Space	Not Visually Evident
Gorge Walls, Canyonlands, Wildlands	Forest, Agriculture, Public Recreation, Open Space	Not Visually Evident
<b>Coniferous Woodland, Oak-Pine Woodland</b>	<b>Forest, Agriculture, Residential, Public Recreation</b>	<b>Visually Subordinate</b>
Residential	Residential	Visually Subordinate
Pastoral	Forest, Agriculture, Public Recreation, Open Space	Visually Subordinate
River Bottomlands	Forest, Agriculture, Public Recreation	Visually Subordinate

**Finding: The scenic standard for this project is Visually Subordinate for portions within Agriculture LUD and Not Visually Evident for portions in Open Space. Not Visually Evident means the proposal shall not be noticeable to the casual visitor, and distinctive natural characteristics of the landscape setting as seen from KVAs or Scenic Routes do not appear altered and remain intact. Visually Subordinate means development could be noticeable but does not dominate the landscape.**

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

5. Proposed development or land uses shall be sited to achieve the applicable scenic standard. Development shall be designed to fit the natural topography, to take advantage of landform and vegetation 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.

**Finding: The proposal is required to meet the scenic standard of Not Visually Evident where it crosses into Open Space. For new trail this includes places where the trail crosses over the cliff face (~0.15 miles of trail). Because the application states that extra efforts would be taken to minimize trail width and cut bank depth to maintain visual subordination together with the distinctive cliff face and rock formations as the backdrop, it is unlikely this portion of new trail would be noticeable to casual observers from KVAs and would be easily overlooked. Decommissioned trail in Open Space would be noticeable until seeding and revegetation efforts establish in the 1-to-2-year time frame.**

**The majority of the project must be visually subordinate. Because the project design criteria state the trail would be designed to take advantage of natural topography and has a dramatic backdrop of cliffs and rock formations, it is unlikely the trail development and decommissioning would be dominant or be what is most remembered about the landscape. The unnatural linear elements of the trail would be noticeable but should blend in and**



**become much less noticeable as seeding and plantings become established. Decommissioned trail would be camouflaged with boulders, scarified soil, plantings, and slash, making it difficult to discern from KVAs.**

6. 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.

A. Decisions shall include written findings addressing the factors influencing the degree of visibility, including but not limited to:

- (1) The amount of area of the building site exposed to key viewing areas,
- (2) The degree of existing vegetation providing screening,
- (3) The distance from the building site to the key viewing areas from which it is visible,
- (4) The number of key viewing areas from which it is visible, and
- (5) The linear distance along the key viewing areas from which the building site is visible (for linear key viewing areas, such as roads).

B. Conditions may be applied to various elements of proposed developments to ensure they meet the scenic standard for their setting as visible from key viewing areas, including but not limited to:

- (1) Siting (location of development on the subject property, building orientation, and other elements),
- (2) Retention of existing vegetation,
- (3) Design (form, line, color, texture, reflectivity, size, shape, height, architectural and design details, and other elements), and
- (4) New landscaping.

**Finding: This proposal is topographically visible from KVAs. The scenic standard for this project is Not Visually Evident for portions within Open Space LUD and Visually Subordinate in the Agriculture LUD.**

### Visibility

**SR14 and Columbia River: Proposal is topographically visible from both SR14 and the Columbia River in the middleground from ~0.6 to 0.66 miles away. It is visible for a linear distance of ~5.31 miles on SR14 and ~8.73 miles on the Columbia River. The degree of vegetation screening the proposal from KVAs from these viewsheds is minimal. The project has potential for not meeting the scenic standards from these KVAs as a great level of detail would be discernable for long linear distances and would have minimal occurrences of vegetation breaking up the view. Conditions shall be required to ensure scenic standard is maintained from SR14 and Columbia River.**





**Suggested conditions of approval:**

- Where trail is visible from SR14 and Columbia River, maximize existing topography and disguise cut/fill to maximum extent possible
- Where trail is visible from SR14 and Columbia River ensure the depth of the trail cut banks be as minimal as possible while maintaining sustainable trail construction.
- Soils removed during construction to be scattered broadly both above and below the trail to minimize the visibility of removed soils. If removed soils will completely cover existing vegetation, soils will be removed from the site to an alternate location.

**Old Hwy 8:** Proposal is topographically visible in the middleground from ~1.3 miles away for a linear distance of ~0.89 miles. Views to the project from Old Highway 8 are sporadic and are broken up by vegetation, winding roads and dramatic roadway grade changes. It is unlikely views of the proposal from this KVA would dominate the viewshed or be noticeable to the casual observer.

**I84 and HCRH:** Proposal is topographically visible from both I84 and the HCRH in the middleground from ~1.5 to 1.6 miles away. It is topographically visible for a linear distance of 6.6 miles on the HCRH and ~6.39 miles on I84. I84 has pockets of vegetation which help to occasionally screen the view of the proposal. HCRH in this section has similar vegetation density, as well as dramatic grade changes and switchbacks which allows for views to the proposal to be dampened by the need for foreground awareness. The project has potential for not meeting the scenic standards from these KVAs as a moderate level of detail would be discernable for long linear distances with low to moderate vegetation screening. Conditions shall be required to ensure scenic standard is maintained from I84 and HCRH.

**Suggested conditions of approval:**

- Where trail is visible from I84 and HCRH, maximize existing topography and disguise cut/fill to maximum extent possible
- Where trail is visible from I84 and HCRH ensure the depth of the trail cut banks be as minimal as possible while maintaining sustainable trail construction.

**Rowena Plateau and Tom McCall:** Proposal is topographically visible from both Rowena Plateau and Tom McCall in the background from ~5.2 to 5.6 miles away. From this distance it is unlikely a casual observer would be able to make out the detail of line and texture as it relates to the ground plane with the design criteria described in the applicant's proposal.

**Cumulative Effects**



**If there are no discernable effects, then there would be no adverse cumulative effects on the Scenic resource because of the project.**

7. 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.

**Finding: See Cultural and Natural Resources sections for consistency with guidelines to protect those resources. There are no conflicts between the guidelines for scenic, natural, or cultural resources in this project.**

8. Proposed development shall not protrude above the line of a bluff, cliff, or skyline as visible from key viewing areas.

**Finding: Proposal would not break the skyline. Guideline met.**

9. 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 meeting this guideline is not feasible considering the function of the structure.

**Finding: No structures are proposed as part of this project. Not applicable.**

10. 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 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).

**Finding: New landscaping is not required to meet the scenic standard. Seeding disturbed areas is required and is part of the proposal.**

**Suggested condition of Approval:**



- Applicant to ensure success of plantings for 2 years and provide status report of planting success.

11. 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 shall include a recommended palette of colors as dark, or darker than the colors in the shadows of the natural features surrounding each landscape setting.

**Finding: No structures are proposed as part of this project. Not applicable.**

12. The exterior of structures on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity. Continuous surfaces of glass shall be limited to ensure meeting the scenic standard. The Scenic Resources Implementation Handbook includes a list of recommended exterior materials and screening methods.

**Finding: No structures are proposed as part of this project. Not applicable.**

13. Any exterior lighting shall be sited, limited in intensity, and 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.

**Finding: No lighting is proposed as part of this project. Not applicable.**

14. Seasonal lighting displays may be permitted on a temporary basis, not to exceed 3 months.

**Finding: No lighting is proposed as part of this project. Not applicable.**

15. New buildings shall be compatible with the general scale of existing nearby development. Expansion of existing development shall comply with this guideline to the maximum extent practicable. New buildings that are 1,500 square feet or less are exempt from this guideline. Findings addressing this guideline shall include but are not limited to:

- A. Application of the landscape setting design guidelines, if applicable.
- B. A defined study area surrounding the development that includes at least ten existing buildings, not including existing buildings within urban areas or outside the National Scenic Area.
- C. Individual evaluations of scale for each separate proposed building in the application and each separate building in the study area, including:
  - (1) All finished above ground square footage;
  - (2) Total area of covered decks and porches;
  - (3) Attached garages
  - (4) Daylight basements
  - (5) Breezeways, if the breezeway shares a wall with an adjacent building



(6) Dimensions, based on information from the application or on Assessor's records D. An overall evaluation demonstrating the proposed development's compatibility with surrounding development. Buildings in the vicinity of the proposed development that are significantly larger in size than the rest of the buildings in the study area should be removed from this evaluation.

**Finding: No structures are proposed as part of this project. Not applicable.**

SMA Guidelines for KVA Foregrounds and Scenic Routes

**Finding: This project is not within a KVA Foreground or Scenic Routes. These guidelines do not apply.**

SMA Guidelines for Areas Not Visible from KVAs

**Finding: These guidelines are not applicable because there are no structures proposed as part of this project.**

## Cultural Resources

SMA Guidelines

1. All cultural resource surveys, evaluations, assessments, and mitigation plans shall be performed by professionals whose expertise reflects the type of cultural resources that are involved. Principal investigators shall meet the professional standards published in 36 CFR 61.

2. For federal or federally assisted undertakings, the reviewing agency shall complete its consultation responsibilities under Section 106 of the Historic Preservation Act of 1966 [36 CFR 800.2].

**Finding: The Cultural Resource Survey Report was prepared to complete agency requirements with respect to Section 106 of the National Historic Preservation Act and Title 36, Code of Federal Regulations, Chapter 800 (36 CFR 800). The Agency Specialist made a determination of "historic properties affected" (36 CFR 800.4 (d)(2)) has been made for the proposed undertaking. The Agency Specialist made a determination of "no adverse effect" (36 CFR 800.5(b)). The survey report was sent to DAHP and the Tribes on January 30, 2023. The 30-day review period ended on March 2, 2023. DAHP provided a letter of concurrence on February 1, 2023. No other responses were received.**

3. Discovery during construction: All authorizations for new developments or land uses shall require the immediate notification of the reviewing agency if cultural resources are discovered during construction or development. If cultural resources are discovered, particularly human bone or burials, work in the immediate area of discovery shall be suspended until a cultural resource professional can evaluate the potential significance of the discovery and recommend measures to protect and if possible, recover the resource. If the discovered material is suspected to be human bone or a burial, the following procedures shall be used:

A. The applicant shall stop all work in the vicinity of the discovery.

B. The applicant shall immediately notify the Forest Service, the applicant's cultural resource professional, the county coroner, and appropriate law enforcement agencies.



C. The Forest Service shall notify the tribal governments if the discovery is determined to be an Indian burial or a cultural resource.

**Finding: A condition of approval shall require work stoppage and notification of the Forest Service’s Agency Specialist in the event of discovery of cultural resources during project construction.**

4. Reviewing agencies shall use the following steps under 36 CFR 800.4 for assessing potential effects to cultural resources and 36 CFR 800.5 for assessing adverse effects to cultural resources.

*Step 1: Literature Review and Consultation*

A. An assessment shall be undertaken to determine whether any cultural resources listed on the National Register of Historic Places at the national, state, or local level are present on or within the area of potential direct and indirect impacts.

B. A search shall be made of state and county government, National Scenic Area/Forest Service, and any other pertinent inventories, such as archives and photographs, to identify cultural resources. The search shall include consultation with the State Historic Preservation Office (SHPO) and tribal governments. State and tribal government response to the consultation request shall be allowed for 30 days.

C. Cultural resource professionals knowledgeable about the area shall be consulted.

*Step 2: Field Inventory*

A. As determined by step 1, the presence of a recorded or known cultural resource, including those reported by tribal governments to be on or within the immediate vicinity of a new development or land use, shall require a field inventory by a cultural resource professional.

B. Tribal representatives shall be invited to participate in the field inventory.

C. The field inventory shall conform to one of the following standards, as determined by the cultural resource professional:

(1) Complete survey: The systematic examination of the ground surface through a controlled procedure, such as walking an area in evenly spaced transects. A complete survey may also require techniques such as clearing of vegetation or augering or shovel probing of subsurface soils for the presence of buried cultural resources.

(2) Sample survey: The sampling of an area to assess the potential of cultural resources within the area of proposed development or use. This technique is generally used for parcels that are large or difficult to survey and is generally accomplished by a stratified random or non-stratified random sampling strategy. A parcel is stratified either by variables such as vegetation, topography, or elevation, or by nonenvironmental factors such as a survey grid. Under this method, statistically valid samples are selected and surveyed to indicate the probability of presence, numbers, and types of cultural resources throughout the





sampling strata. Depending on the results of the sample, a complete survey may or may not subsequently be recommended.

D. A field inventory report shall be required and shall include the following:

(1) A narrative integrating the literature review (step 1) with the field inventory (step 2).

(2) A description of the field inventory methodology used. The description shall include the type and extent of field inventory and shall be supplemented by maps that graphically illustrate the areas surveyed and not surveyed and provide the rationale for each.

(3) A statement of the presence or absence of cultural resources within the area of the new development or land use.

(4) When cultural resources are not located, a statement of the likelihood of buried or otherwise concealed cultural resources. Recommendations and standards for monitoring, if appropriate, shall be included.

E. The report shall follow the format specified by the Washington Department of Archaeology and Historic Preservation for inventories conducted in the State of Washington. Reports for inventories conducted in the State of Oregon shall follow the format specified by the Oregon State Historic Preservation Office.

F. The field inventory report shall be presented to the Forest Service for review.

*Step 3: Evaluations of Significance*

A. When cultural resources are found within the area of the new development or land use, an evaluation of significance shall be completed for each cultural resource in accordance with the criteria of the National Register of Historic Places (36 CFR 60.4).

B. Evaluations of cultural resource significance shall be guided by previous and current research designs relevant to specific research questions for the area.

C. Evaluations of the significance of traditional cultural properties shall follow National Register Bulletin 38, "Guidelines for the Evaluation and Documentation of Traditional Cultural Properties," within local and regional contexts.

D. Recommendations for eligibility to the National Register shall be completed for each identified resource, in accordance with National Register criteria A through D (36 CFR 60.4). The Forest Service shall review evaluations for adequacy.

E. Evidence of consultation with tribal governments and individuals with knowledge of the cultural resources in the project area, and documentation of their concerns, shall be included as part of the evaluation of significance.

*Step 4: Assessment of Effect*

A. For each significant (i.e., eligible for the National Register) cultural resource inventoried within the area of the proposed development or change in use, assessments of



effect shall be completed, using the criteria outlined in 36 CFR 800.5 ("Assessing Effects"). Evidence of consultation with tribal governments and individuals with knowledge of the cultural resources of the project area shall be included for B through D below. The Forest Service shall review each determination for adequacy.

B. If the proposed development or change in use will have "No Adverse Effect" (36 CFR 800.4) to a significant cultural resource, documentation for that finding shall be completed, following the "Documentation Standards" of 36 CFR 800.11. If the proposed development or change in use will have an effect, then the criteria of adverse effect must be applied (36 CFR 800.5).

C. If the proposed development or change in use will have an "Adverse Effect" [36 CFR 800.5] to a significant cultural resource, the type and extent of "adverse effect" upon the qualities of the property that make it eligible for the National Register shall be documented (36 CFR 800.6 "Resolution of Adverse Effects"). This documentation shall follow the process outlined under 36 CFR 800.11 ("Failure to Resolve Adverse Effects").

D. If the "effect" appears to be beneficial (i.e., an enhancement to cultural resources), recommendations shall be documented concerning the beneficial effects upon the qualities of the cultural resource that make it eligible for the National Register. This documentation shall follow the process outlined under 36 CFR 800.11 ("Documentation Standards").

*Step 5: Mitigation*

A. If there will be an effect on cultural resources, mitigation measures shall be provided (36 CFR 800.6 "Resolution of Adverse Effects"). Mitigation measures that shall be considered include avoidance of the property through project design or modification and subsequent protection, burial under fill, data recovery excavations, and other appropriate measures.

B. Evidence of consultation with tribal governments and individuals with knowledge of the affected resources, and documentation of their concerns, shall be included for all mitigation proposals.

C. The Forest Service shall review all mitigation proposals for adequacy.

**Finding: DAHP provided a letter of concurrence on February 1, 2023. No other comments were received from reviewing agencies.**

5. Determination of potential effects to significant cultural resources shall include consideration of cumulative effects of proposed developments that are subject to any of the following: 1) a reconnaissance or historic survey; 2) a determination of significance; 3) an assessment of effect; or 4) a mitigation plan.

**Finding: This project required a reconnaissance survey and has been found to have no adverse effects to cultural resources. Because there are no adverse effects to cultural resources as a result of this project, there are no cumulative effects to cultural resources.**



## Natural Resources

### SMA Guidelines: Water Resources / Wildlife and Plants

1. All new development and uses, as described in a site plan prepared by the applicant, shall be evaluated using the following guidelines to ensure that natural resources are protected from adverse effects. Cumulative effects analysis is not required for expedited review uses or development. Comments from state and federal agencies shall be carefully considered. (Site plans are described under “Review Uses” in Part II, Chapter 7: General Policies and Guidelines.)

2. Water Resources (Wetlands, Streams, Ponds, Lakes, and Riparian Areas)

### **Finding: All project activities occur outside of the appropriate water resource buffers and no water resource buffer zones that would be impacted by the proposed action.**

A. All Water Resources shall, in part, be protected by establishing undisturbed buffer zones as specified in 2.A.(2)(a) and 2(b) below. These buffer zones are measured horizontally from a wetland, stream, lake, or pond boundary as defined below.

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

(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:

(i) The wetland within the right-of-way is a drainage ditch not part of a larger wetland outside of the right-of-way.

(ii) The wetland is not critical habitat.

(iii) Proposed activities within the right-of-way would not adversely affect a wetland adjacent to the right-of-way.

(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.

(4) Buffer zones can be reconfigured if a project applicant demonstrates all the following: (1) the integrity and function of the buffer zone 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.

(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 rare wildlife/plant or water resource, (2) describes the biology of the rare 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.

(6) The local government shall submit all requests to re-configure rare wildlife/plant or water resource buffers to the 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 opposing conclusion.

**Finding: Water resources in the vicinity of the project are all intermittent, non-fish bearing streams. A 50-foot buffer was placed around all water resources within the project area, as indicated on the site plan. All project activities occur outside of the appropriate water resource buffers and no water resource buffer zones that would be impacted by the proposed action.**

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.

**Finding: Project activities will not impact buffer zones. Guideline is met.**

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

**Finding: A 50-foot buffer was placed around all water resources within the project area, as indicated on the site plan. Guideline is met.**



D. Wetlands Boundaries shall be delineated using the following:

- (1) The approximate location and extent of wetlands in the National Scenic Area is shown on the National Wetlands Inventory (U.S. Department of the Interior). In addition, the list of hydric soils and the soil survey maps shall be used as an indicator of wetlands.
- (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. Wetland boundaries shall be delineated using the procedures specified in the 'Corps of Engineers Wetland Delineation Manual (on-line edition)' and applicable Regional Supplements.
- (4) All wetlands' delineations shall be conducted by a professional who has been trained to use the federal delineation procedures.

**Finding: Guideline is not applicable. There are no wetlands within the project area.**

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

**Finding: A 50-foot buffer from the bank full flow boundary was placed around all water resources within the project area, as indicated on the site plan. Guideline is met.**

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 local government will ask for technical assistance from the Forest Service to render a final delineation.

**Finding: Project has been reviewed by the Columbia River Gorge National Scenic Area Hydrologist. Guidelines is met.**

G. Buffer zones shall be undisturbed unless the following criteria have been satisfied

**Finding: Buffer zones remain undisturbed as part of this project. Guideline is met.**

H. The proposed use must have no practicable alternative as determined by the practicable alternative test.

- (1) Those portions of a proposed use that have a practicable alternative will not be located in wetlands, stream, pond, lake, and riparian areas 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, and

(b) Impacts to the wetland must be the last possible documented alternative in fixing the public safety concern or completing the restoration/enhancement project, and

(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 SMA mitigation plan.

**Finding: Because there will be no disturbance within the water resource buffers a practicable alternative test is not required as part of this project.**

I. 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 adverse shall be prohibited.

**Finding: If no discernable effects, then there would be no adverse cumulative effects on the Water resource because of the project.**

### 3. Wildlife and Plants

A. Protection of wildlife/plant areas and sites shall begin when proposed new development or uses are within 1000 feet of a rare wildlife or rare plant area or site. Rare wildlife areas are those areas depicted in wildlife data, including all sensitive wildlife sites and Priority Habitats listed in this Chapter. The approximate locations of rare wildlife and rare plant areas and sites are shown in wildlife and rare plant data.

**Finding: Wildlife areas and sites found within 1000 feet of the project area include Peregrine falcons (Coyote Wall cliffs to the east of trail re-alignment) and Forest Sensitive (in WA) western gray squirrel (oak woodlands, north end of trail re-alignment).**

**Rare plant species or areas found within 1000 feet of the project area include *Potentilla newberryi*, *Plectritis brachystemon*, *Lomatium suksdorfii*, and *Penstemon barrettiae*.**

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

**Finding: Many of the wildlife concerns are related to the cliffs adjacent to the project area. The trail re-alignment moves a great deal of the existing trail located**



**next to the cliff edge away from there, better protecting wildlife resources. WDFW was notified of, and approved of, the project.**

**The re-alignment of the trail away from the cliff edge is beneficial to rare plants, as it is also where some species may occur. Additionally, several rare plant occurrences are historical in nature or outside of any of the direct trail re-alignment. DNR heritage was notified of and reviewed trail re-routes and the project. Guideline is met.**

C. The Forest Service wildlife biologists and botanists, in consultation with the appropriate state biologists, shall review the site plan and their field survey records. They shall:

- (1) Identify/verify the precise location of the wildlife or plant area or site,
- (2) Determine if a field survey will be required,
- (3) Determine, based on the biology and habitat requirements of the affected wildlife/plant species, if the proposed use would compromise the integrity and function of or result in adverse effects (including cumulative effects) to the wildlife and plant area or site. This would include considering the time of year when wildlife and plant species are sensitive to disturbance, such as nesting and rearing seasons, or flowering season, and,
- (4) Delineate the undisturbed 200-ft buffer on the site plan for rare plants or the appropriate buffer for rare wildlife areas or sites, including nesting, roosting, and perching sites.
  - (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.
  - (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 rare wildlife/plant or water resource, describes the biology of the rare 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 to the water resource and its long-term function.
  - (c) The local government shall submit all requests to re-configure rare wildlife/plant or water resource buffers to the 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 zone



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.

**Finding: The USFS wildlife biologist and USFS botanist were both involved in the planning and decision making with the new trail re-alignment. Plans were also shared and given approval by a WDFW biologist and by a DNR heritage botanist. Guideline is met.**

D. The local government, in consultation with the state and federal wildlife biologists and botanists, shall use the following criteria in reviewing and evaluating the site plan to ensure that the proposed development or uses do not compromise the integrity and function of or result in adverse effects to the wildlife and 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 management guidelines for osprey and great blue heron; Washington Department of Wildlife guidelines for a variety of species, including the western pond turtle, the peregrine falcon, and the Larch Mountain salamander.
- (2) Physical characteristics of the subject parcel and vicinity, including topography and vegetation.
- (3) Historic, current, and proposed uses in the vicinity of the rare wildlife/plant area or site.
- (4) Existing condition of the wildlife/plant area or site and the surrounding habitat 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.
- (6) The site plan is consistent with published guidance documents such as "Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife Resources" (Oregon Department of Fish and Wildlife 2008 or most recent version) and Washington's Aquatic Habitat Guidelines (2002 or most recent version).
- (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.
- (8) The site plan illustrates that new development and uses, including bridges, culverts, and utility corridors, shall not interfere with fish and wildlife passage.
- (9) Maintain, protect, and enhance the integrity and function of Priority Habitats as listed on the following Priority Habitats Table 1. 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.



<b>Priority Habitats Table</b>	
<b>Priority Habitats</b>	<b>Criteria</b>
Aspen stands	High fish and wildlife species diversity, limited availability, high vulnerability to habitat alteration.
Caves	Significant wildlife breeding habitat, limited availability, dependent species.
Old-growth forest	High fish and wildlife density, species diversity, breeding habitat, seasonal ranges, and limited and declining availability, high vulnerability.
Oregon white oak woodlands	Comparatively high fish and wildlife density, species diversity, declining availability, high vulnerability.
Prairies and steppe	Comparatively high fish and wildlife density, species diversity, important breeding habitat, declining and limited availability, high vulnerability.
Riparian	High fish and wildlife density, species diversity, breeding habitat, movement corridor, high vulnerability, dependent species.
Wetlands	High species density, high species diversity, important breeding habitat and seasonal ranges, limited availability, high vulnerability.
Snags and logs	High fish and wildlife density, species diversity, limited availability, high vulnerability, dependent species.
Talus	Limited availability, unique and dependent species, high vulnerability.
Cliffs	Significant breeding habitat, limited availability, dependent species.
Dunes	Unique species habitat, limited availability, high vulnerability, dependent species.

**Finding: Priority Habitats within 1000 ft. of the proposed trail re-alignment include: Oregon white oak woodlands; cliffs; talus. The proposal meets the guidelines because, considering multiple resource concerns, the trail re-route seeks to move away from and/or limit direct access to these priority habitats.**

E. The wildlife/plant protection process may terminate if the local government, in consultation with the Forest Service and state wildlife agency or heritage program, determines (1) the rare 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, or (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.

**Finding: The proposal meets the guidelines because the re-route balances wildlife protection needs while allowing for adequate recreational resource experience. The re-route will also alleviate further resource impacts to vegetation.**

F. 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.

**Finding: The proposal meets the guidelines because the trail re-alignment improves possible effects to a priority habitat by re-aligning the trail away from sections of the Coyote Wall cliffs and will repair and rehabilitate impacted areas.**

G. The local government shall submit a copy of all field surveys (if completed) and mitigation plans to the 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.

H. 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.

**Finding: The proposal meets the guidelines above because CRGNSA submitted the application to the WDFW, and they approved of the project. The project was also submitted to Washington DNR heritage program for rare plants. The proposal meets the guidelines because the project itself lowers the possibility of adverse effects to wildlife and botanical resources.**

I. 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 rare wildlife/plant area or site.

**Finding: The proposal meets the guidelines because no other future trails are planned within 1000 feet of cliffs, talus, oak woodlands, or rare plant areas near the project area; therefore, no cumulative effects.**

#### 4. Soil Productivity

A. 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.

**Finding: The proposal is consistent with this guideline because trail design standards and erosion control measures will limit the amount of soil displacement from the new trail segments. Over the long-term, the new trail segments will improve soil stability and productivity in the project area while ongoing monitoring and restoration actions will ensure ground cover guidelines are met.**

#### Practicable Alternative Test

**Finding: A practicable alternative test was not required because there would be no impacts to water resource protection buffers.**

#### Mitigation Plan

1. Mitigation Plans shall be prepared when:

- A. The proposed development or use is within a buffer zone (wetlands, ponds, lakes, riparian areas, or wildlife or plant areas or sites).
- B. There is no practicable alternative (see the “practicable alternative” test).

**Finding: A mitigation plan is not required because the proposed activities would not occur within a natural resource buffer zone.**

## Recreation

### SMA Guidelines

1. New development and land uses shall not displace existing recreational use.

**Finding: The proposed realignments and trail decommissioning will not displace existing recreational use. Mountain biking opportunities are expected to be enhanced by the proposed realignments and hiking will continue to be allowed on the Coyote Wall trail. Guideline is met.**

2. Recreation resources shall be protected from adverse effects by evaluating new development and land uses as proposed in the site plan. An analysis of both onsite and offsite cumulative effects shall be required.

**Finding: The project will improve recreation opportunities for mountain bikers and hikers. Of the 194 miles of National Forest System trails in the Columbia River Gorge National Scenic Area, only 37 miles are currently open to bicycles and only 19 of those were**



**designed, and are managed, for bicycle use (including Coyote Wall Trail). The proposed realignments will protect resources while greatly improving opportunities for mountain biking in this popular area. Guideline is met.**

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

**Finding: No motorized uses proposed on Coyote Wall Trail. Guideline is met.**

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

**Finding: Proposal will improve recreation resources by development of a sustainably designed trail that can sustain high levels of mountain biking and hiking use. Guideline is met.**

5. The Facility Design Guidelines are intended to apply to individual recreation facilities. Development or improvements within the same Recreation Intensity Class are considered as separate facilities if they are separated by at least 1/4 mile of undeveloped land (excluding trails, pathways, or access roads).

**Finding: Guideline is not applicable because there are no recreation facilities proposed as part of this project. The Management Plan defines a recreation facility as “A cluster or grouping of recreational developments or improvements located in relatively close proximity to one another.” The proposed trail developments are not clustered or grouped in close proximity to one another.**

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

**Finding: This project does not include new development or reconstruction of scenic routes, so this guideline does not apply.**

7. A local government may grant a variance of up to 10 percent to the guidelines of Recreation Intensity Class 4 for parking and campground units upon demonstration that all of the following conditions exist:

- A. Demand and use levels for the proposed activity(s), particularly in the area where the site is proposed, are high and expected to remain so or increase. Statewide Comprehensive Outdoor Recreation Plan (SCORP) data and data from the National Visitor Use Monitoring Program shall be relied upon to meet the criterion in the absence of current applicable studies.
- B. The proposed use is dependent on resources present at the site.
- C. Reasonable alternative sites offering similar opportunities, including those in urban areas, have been evaluated, and it has been demonstrated that the proposed use cannot be adequately accommodated elsewhere.
- D. The proposed use is consistent with the goals, objectives, and policies in this chapter.
- E. Through site design and mitigation measures, the proposed use can be implemented without adversely affecting scenic, natural, or cultural resources and adjacent land uses.
- F. Through site design and mitigation measures, the proposed use can be implemented without affecting or modifying treaty rights.



**Finding: There is no variance requested as part of this project. Guideline does not apply.**

8. Proposals to change the Recreation Intensity Class of an area shall require a Management Plan amendment pursuant to policies 1 through 4 in "Amendment of the Management Plan" (Part IV, Chapter 1: Gorge Commission Role).

9. The Recreation Intensity Classes are designed to protect recreation resources by limiting land development and land uses.

**Finding: There would be no change to the recreation intensity class in this area. Guidelines do not apply.**

Recreation Intensity Classes SMA Guidelines

**Finding: Project activities occur in Recreation Intensity Class 1. Guidelines for RIC 2-4 do not apply.**

1. Recreation Intensity Class 1 (Very Low Intensity)

Social Setting: Visitors in this designation have a high chance of finding solitude and opportunities to experience activities that rely on self-reliance, challenge, and risk. Encounters with other visitors is low throughout the designation. Perceived crowdedness is low to non-existent away from roads recreation sites. Visitor encounters and perceived crowdedness is low to moderate at or near (within 1 mile) roads and recreation sites.

Physical and Managerial Setting: Predominately natural/natural appearing landscapes with rustic improvements characterize this designation. Nodes of developed recreation facilities may be allowed. Developed recreation site regulations and controls (signing, regulations or other regimentation) are noticeable but harmonize with the natural characteristics of the landscape setting. Away from developed recreation sites there is minimal or subtle control of users. Trail development is simple and typically accommodate low use levels. Users are highly skilled with a high degree of orienteering skills.

A. The maximum design capacity for parking areas shall be 10 vehicles.

B. The following uses may be permitted:

- (1) Trails and trailheads.
- (2) Parking areas.
- (3) Dispersed campsites accessible only by a trail.
- (4) Viewpoints and overlooks.
- (5) Picnic areas.
- (6) Signs.
- (7) Interpretive exhibits and displays.
- (8) Restrooms.



(9) Accommodations for mass transportation facilities should be considered where compatible with the social and physical settings.

**Finding: Project area consists of lands designated as Recreation Intensity Class I (Very Low Intensity), which allow for construction of trails and viewpoints as proposed by this project. Guideline is met.**

## Conclusion

The proposed trail realignment activities are consistent with the National Scenic Area Management Plan Policy and Guidelines provided they meet the criteria and conditions listed in the Findings of Fact and Consistency Determination.



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