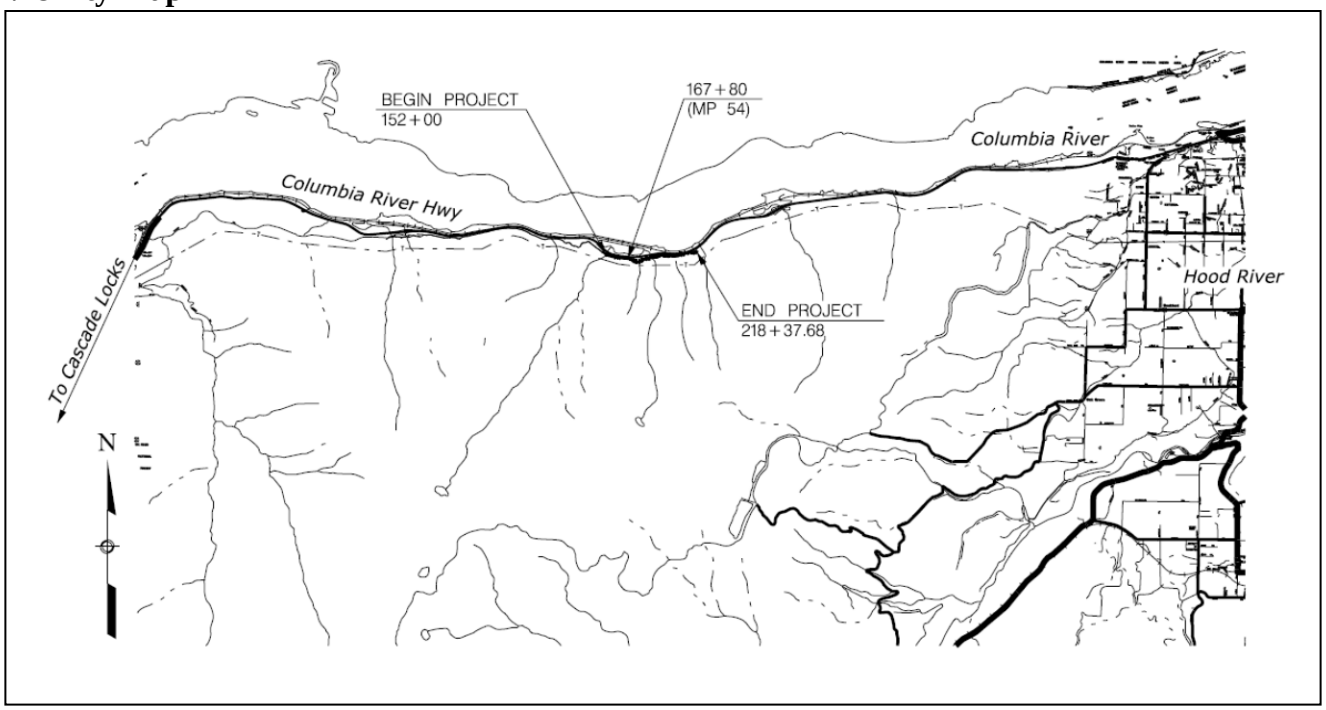
FINDINGS OF FACT

LANDOWNER:	USDA Forest Service
PROPOSED ACTION:	Construct .23 miles of trail
LOCATION:	Township 2N Range 9E Section 4 Tax lot ID: 400
NATIONAL SCENIC AREA DESIGNATION:	Special Management Area
LAND USE DESIGNATION:	Open Space
LANDSCAPE SETTING:	Coniferous Woodland

Vicinity Map



FINDINGS OF FACT:

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as adopted in 2004 and updated in 2011, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in regular type. The findings are displayed in **bold type**.

LAND USE DESIGNATIONS

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

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.

Findings: The Columbia Tributaries East Watershed Analysis (1998) met requirements for the Open Space plan. The proposal has been reviewed for consistency with the recommendations and desired future conditions of the open space plan. It is found to not conflict with the open space plan, provided mitigation measures proposed and required for resource protection are implemented.

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:
    a. Resource enhancement projects for the purpose of enhancing scenic, cultural, recreation and/ or natural resources, subject to the guidelines in the "Resource Enhancement Projects" (Part II, Chapter 7: General Policies and Guidelines). These projects may include vegetation management and forest practices (subject to the forest practice guidelines of Part II, Chapter 2: Forest Land) for the restoration of forest health, new structures (e.g., fish ladders, sediment barriers) and/or activities (e.g., closing and revegetation unused roads, recontouring abandoned quarries).
    b. Low-intensity recreation uses and developments, including educational and interpretive facilities, consistent with Part 1, Chapter 4: Recreation Resources.

Findings: The proposal includes construction of a trail and natural resource enhancement to mitigate impacts from the project. Refer to the Recreation Resources section of these findings for documentation on consistency with the Low-intensity recreation class. These uses are allowed with review in SMA Open Space.

SCENIC RESOURCES

The Management Plan, Part I, Chapter 1 (Scenic Resources), SMA guidelines, states:

SMA Design Guidelines Based on Landscape Settings

1. The following guidelines apply to all lands within SMA landscape settings regardless of visibility from KVAs (includes areas seen from KVAs as well as areas not seen from KVAs):
   B. Coniferous Woodland and Oak-Pine Woodland: Woodland areas shall retain the overall appearance of a woodland landscape. New developments and land uses shall retain the overall visual character of the natural appearance of the Coniferous Woodland and Oak-Pine Woodland landscape.
      (1) Buildings shall be encouraged to have a vertical overall appearance in the Coniferous Woodland landscape setting and a horizontal overall appearance in the Oak-Pine Woodland landscape setting.
      (2) Use of plant species native to the landscape setting shall be encouraged. Where non-native plants are used, they shall have native-appearing characteristics.

Findings: The project is within the Coniferous Woodland landscape setting. All plants will be species native to the coniferous woodland. Structures proposed include the trail, bridge, associated signs and picnic areas. These features will be low profile and designed to meet the Not Visually Evident scenic standard. The proposed project will retain the overall appearance of the landscape setting through the preservation of existing native vegetation, removal of nonnative species and minimizing earth movement.

SMA Guidelines for Development and Uses Visible from KVAs

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

Findings: The proposed project would be topographically visible from the following Key Viewing Areas: I-84, SR 14, Dog Mountain, Cook Underwood Road and the Columbia River.

2. New developments 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.

Findings: The project is required to meet Not Visually Evident scenic standard. Existing native vegetation, existing topography and the low profile of the proposed project will screen it from view of SR 14, Dog Mountain, Cook Underwood Road and the Columbia River. The project is adjacent to I-84 and as such has the highest probability of being visibly evident to the casual observer. Considering this, effects are addressed in detail for I-84. Unless otherwise noted it is assumed that if one aspect of the proposed development meets Not Visually Evident for I-84 that it will meet that standard for the other Key Viewing Areas.

Interstate 84

The view from I-84 from where the project is topographically visible is almost entirely framed by trees. There is not an expansive view of the gorge from this location. The interstate is predominantly straight and does not direct passengers view to the project location. Currently the view from I-84 of the project area is characterized by evergreen trees with small pockets of hardwood species. There is an open patch (approximately 1 acre) that is predominantly low growing nonnative species which is visible from the interstate. The view of this opening is very limited due to existing screening and its location being perpendicular to the flow of traffic.

Structures proposed include the trail, a bridge, signs and a stone seat wall. The proposal also includes clearing of non-native plant species such as English ivy and Himalayan blackberry and establishing native plant species in these areas. Existing native trees will be retained and partially screen the proposed development from view of I-84.

There is one (two piece) "pedestrian crossing" sign and two trail directional signs. These signs will be small enough (less than 30"x 30") screened by existing vegetation. The signs would be an earthtone color.

- **The proposed sign backs and posts should be painted a dark earthtone color to meet Not Visually Evident.**

The stone seat wall proposed would be less than 30" tall, screened by existing vegetation and offset from I-84 by a few hundred feet. The stone would be a native stone that would blend in with the surrounding natural landscape. The proposed wall would meet Not Visually Evident from I-84 as proposed. In addition to CRGNSA Management Plan guidelines the Forest Service has recommended design guidelines for landscape features such as masonry walls to provide design coherence. Considering this, it is recommended that:

- **All stone masonry utilizes local basalt and be of an irregular, random coursed pattern to best reflect the natural qualities of local stone.**

The trail bridge would be partially screened from I-84 by existing native vegetation and an earthen berm. The bridge would be concrete. The trail would be asphalt surface with gravel shoulders in some locations. Existing and new vegetation would screen the proposed trail surface from view of I-84 almost entirely. In order for the bridge and trail to meet Not Visually Evident as viewed from I-84 the following conditions of approval are recommended:

- **Existing native screening vegetation between the trail and I-84 should be retained.**
- **All stumps and cut faces created during project construction which are visible from I-84 should be flush cut.**

- **All steel on proposed MSE walls should be weathering steel to blend with the natural landscape.**
- **Concrete for the Warren Creek bridge should include an integral color that is dark gray to match the color of native basalt and weathered concrete. Additionally the visible surfaces of the concrete should be sand blasted to expose aggregate, add texture and allow for surface weathering. A sample of cured concrete should be submitted to the Forest Service landscape architect to ensure color standards will be met.**
- **Rock utilized for the porous rock embankment west of Warren creek should be native basalt that matches the surrounding natural landscape.**
- **A 20 foot strip along the north edge of the trail should be planted with native screening vegetation. Species should include a variety of native plants that are dense growing (such as tall Oregon grape) and tall shrubs to achieve 80% screening within 5 years of project construction. The final planting plan should be submitted to the Forest Service for review by a landscape architect to ensure this standard will be met.**

The proposed trail and bridge would be visible from the interstate for a few years until structures weather and new native vegetation establishes. Within 5 years the project will meet the Not Visually Evident scenic standard as seen from I-84.

SR 14 and the Columbia River
Views from these locations of the proposed project would have no measurable change because of the similar vantage point (low elevation), existing screening and viewers distance.

Dog Mountain and Cook Underwood Road
Views from these locations would be from a higher elevation and as such the proposed development may have been visible. Considering the very limited vegetation clearing proposed by this project and the viewing distance (approximately 1 mile or more) there is very low probability that the project would be visible to the casual observer. The proposal would meet Not Visually Evident as seen from Dog Mountain and Cook Underwood Road provided it meets the mitigation measures outlined above.

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

Required SMA Scenic Standards		
LANDSCAPE SETTING	LAND USE DESIGNATION	SCENIC STANDARD
Coniferous Woodland, Oak-Pine Woodland	Forest (National Forest Lands), **Open Space**	**Not Visually Evident**
River Bottomlands	Open Space	Not Visually Evident
Gorge Walls, Canyonlands, Wildlands	Forest, Agriculture, Public Recreation, Open Space	Not Visually Evident
Coniferous Woodland,	Forest, Agriculture, Residential,	Visually Subordinate

Oak-Pine Woodland	Public Recreation	
Residential	Residential	Visually Subordinate
Pastoral	Forest, Agriculture, Public Recreation, Open Space	Visually Subordinate
River Bottomlands	Forest, Agriculture, Public Recreation	Visually Subordinate

Findings: The project is in the Coniferous Woodland landscape setting in Open Space and is therefore required to meet the Not Visually Evident scenic standard.

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.

Findings: With mitigation the proposed development would blend into the natural woodland landscape as observed by KVAs.

5. Proposed developments 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.

Findings: The proposed trail utilizes existing topographic and vegetative screening to the maximum extent practicable while providing enough clearance over Warren Creek and accommodation for an Accessible trail grade. Additional vegetative screening will be necessary during winter months to screen the development from the view along I-84 which is addressed as a mitigation measure.

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 seen 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 (color, reflectivity, size, shape, height, architectural and design details and other elements), and
(4) New landscaping.

Findings: Conditions of approval for consistency with scenic guidelines were developed in consideration of the size, degree of KVA visibility and existing topography and vegetation.

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.

Findings: The trail has been designed to meet scenic, cultural and natural resource standards and guidelines.

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).

Findings: The proposed mitigation activities including invasive weed control and native plantings will be maintained and monitored by the applicant. Additional evergreen vegetation for screening will be maintained and monitored as well. The proposed native species are anticipated to have high success and to achieve the scenic standard within five years of implementation.

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. 12. The exterior of structures on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity. The Scenic Resources Implementation Handbook shall include a recommended list of exterior materials. These recommended materials and other materials may be deemed consistent with this guideline, including those where the specific application meets approval thresholds in the "Visibility and Reflectivity Matrices" in the Implementation Handbook. Continuous surfaces of glass unscreened from key viewing areas shall be limited to ensure meeting the scenic standard. Recommended square footage limitations for such surfaces will be provided for guidance in the Implementation Handbook.

Findings: The proposed structures will be minimized and color treated to be dark earth tones so as to blend with surrounding natural landscape.

Cumulative Effects: The proposed trail development would result in no adverse effects to scenery. There are no anticipated future actions that would result in reduction of vegetative or topographic screening of this section of trail as viewed from KVAs or change the visibility of the proposed project. Considering current conditions and anticipated future actions there are no cumulatively adverse effects to scenic resources provided conditions of approval are implemented.

SMA Guidelines for KVA Foregrounds and Scenic Routes

1. All new developments and land uses immediately adjacent to scenic routes shall be in conformance with state or county scenic route guidelines.

Findings: This section of proposed trail is not immediately adjacent to a scenic route.

SMA Sign Provisions

<u>SMA Policies</u>
The Management Plan, Part 2, Chapter 7, SMA Sign Provisions states:

1. All public signs subject to review located in the SMA must be designed and located in compliance with the standards described in the Columbia River Gorge National Scenic Area Graphic Signing System and must conform to the standards contained in the Manual for Uniform Traffic Control Devices.

Findings: The proposed project includes directional signage which has incorporated the color, materials and forms of the Graphic Sign System which are consistent and unifying. Other signs include safety signage which is consistent with MUTCD signage. The proposed signs are consistent with this guideline.

CULTURAL RESOURCES

The Management Plan, Part I, Chapter 2 (Cultural Resources), SMA Policies states:

1. New developments or land uses shall not adversely affect significant cultural resources.
2. Federal agencies shall follow steps 1 through 5 under Guideline 4 below, for new developments or land uses on all federal lands, federally assisted projects, and forest practices.
7. The Forest Service shall be responsible for performing steps 1 through 5 under guideline 4 for forest practices and National Forest system lands.
8. The Forest Service shall consult with the Indian tribal governments and other consulting parties in performing steps 1 through 5 under guideline 4.

The Management Plan, Part I, Chapter 2 (Cultural Resources), SMA Guidelines states:
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. (Added: U.S. Sec. Ag. concurrence 7/1/11)

Findings: A report on the cultural resources within the project area was prepared: "Summary of Archaeological Investigations of the HCRH Milepost 2016 Reconnection Project: Wyeth to Starvation Creek Segment" by Connolly, Knowles and Ruiz (Museum Report 2014-015). No adverse effects to significant cultural resources are expected from the implementation of this project. Without adverse effects there are no cumulative adverse effects. Significant cultural resources have been avoided through project design (Connolly, Knowles and Ruiz 2014:145). This report was reviewed by a Forest Service Archaeologist for consistency with the CRGNSA Management Plan guidelines. No additional survey work is necessary however the following conditions should be made to avoid adverse effects to cultural resources:

- **Work-limit boundaries should be clearly flagged around all work sites located near historic or cultural resources, as suggested in Michael Schurke's Effect Recommendation report, dated July 28, 2014.**
    - **The Dalles-Sandy Wagon Road (35HR128) Archaeologist should post work limits on the ground to protect the site against impacts in segments that occur on and off National Forest System lands.**
- **All work near identified historic or cultural sites should be monitored by a qualified archaeologist, as suggested in Michael Schurke's Effect Recommendation report, dated July 28, 2014.**
    - **The Dalles-Sandy Wagon Road (35HR128)**
- **A condition should be placed stating that should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the CRGNSA office and the Oregon Office of Archeology and Historical Preservation. The applicant should also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.**

NATURAL RESOURCES

The Management Plan, Part II, Chapter 3 (Natural Resources), SMA guidelines, states:

WATER RESOURCES (WETLANDS, STREAMS, PONDS, LAKES, AND RIPARIAN AREAS)

SMA Guidelines

1. All new developments 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. 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)

   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.

Findings: The project is within the 200' buffer of Warren Creek, a perennial sensitive fish bearing stream and the 50' buffer of Wonder Creek, an intermittent non-fish bearing stream.

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.

Findings: All disturbed areas within the buffer zones will be planted with native plant species as per the planting plan submitted.

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

Findings: ODOT in coordination with Forest Service staff identified all appropriate water resources and buffers.

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 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.
G. Buffer zones shall be undisturbed unless the following criteria have been satisfied:
(1) The proposed use must have no practicable alternative as determined by the practicable alternative test.
Those portions of a proposed use that have a practicable alternative will not be located in wetlands, stream, pond, lake, and riparian areas and/or their buffer zone.

Practicable Alternative Test

1. An alternative site for a proposed use shall be considered practicable if it is available and the proposed use can be undertaken on that site after taking into consideration cost, technology, logistics, and overall project purposes.
A practicable alternative does not exist if a project applicant satisfactorily demonstrates all of the following:
A. The basic purpose of the use cannot be reasonably accomplished using one or more other sites in the vicinity that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites.
B. The basic purpose of the use cannot be reasonably accomplished by reducing its proposed size, scope, configuration, or density, or by changing the design of the use in a way that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites.
C. Reasonable attempts were made to remove or accommodate constraints that caused a project applicant to reject alternatives to the proposed use. Such constraints include inadequate infrastructure, parcel size, and land use designations. If a land use designation or recreation intensity class is a constraint, an applicant must request a Management Plan amendment to demonstrate that practicable alternatives do not exist.

Findings: The basic purpose of the proposed activity it is to connect remnant segments of the Historic Columbia River Highway with a state trail that provides for safe pedestrian, bicyclist and ADA use. HCRH State Trail standard design guidelines were developed to address this need. The proposed alignment was selected because it resulted in the least amount of impact to riparian resources while meeting these design guidelines. Alternative alignments were considered but would have resulted in a greater impact to riparian areas or would not have met the basic purpose. The proposed trail design, bridge and seating area near Wonder Creek have been modified to reduce development within the buffer zone and better accommodate the hydrology of the area.

- **It should be made a condition of approval that the following design modifications be implemented:**
  - **OR DOT CRGNSA 100(1), Wonder Creek Flow Through Embankment Memorandum, submitted by James Neighbor (WFLHD) on August 14, 2014**
  - **Warren Creek Bridge- Details, submitted by Walker Macy on December 17, 2014**
  - **Wonder Creek Trail Side Rest Area STA 175+00 design as submitted by ODOT and plotted August 19, 2014**

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

Findings: The entire Segment D (including portions on State land) will impact approximately 1.7 acres of water resources buffer and .003 acres of direct impacts to water resources. In order to offset these impacts the applicant has prepared a mitigation plan to address impacts to all natural resource. Refer to Mitigation Plan in these findings for additional information.

H. Determination of potential natural resources effects shall include consideration of cumulative effects of proposed developments within the following areas: wetlands, streams, ponds, lakes, riparian areas and their buffer zones. *(Added: U.S. Sec. Ag. concurrence 7/1/11)*

Findings: See Cumulative Effects for Natural Resources after findings for sensitive wildlife and plant species.

3. Wildlife and Plants

A. Protection of sensitive wildlife/plant areas and sites shall begin when proposed new developments or uses are within 1000 ft of a sensitive wildlife/plant site and/or area.

Sensitive Wildlife Areas are those areas depicted in the wildlife inventory and listed in Table 2, including all Priority Habitats listed in this Chapter. The approximate locations of sensitive wildlife and/or plant areas and sites are shown in the wildlife and rare plant inventory.

B. The local government shall submit site plans (of uses that are proposed within 1,000 feet of a sensitive wildlife and/or plant area or site) for review to the 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 or Washington Natural Heritage Program for plant issues).

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

(1) Identify/verify the precise location of the wildlife and/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 or plant area or site. This would include considering the time of year when wildlife or plant species are sensitive to disturbance, such as nesting and rearing seasons, or flowering season, and

(4) Delineate the undisturbed 200 ft buffer on the site plan for sensitive plants and/or the appropriate buffer for sensitive wildlife areas or sites, including nesting, roosting and perching sites.

Findings: Surveys for sensitive wildlife and plant species were completed for the entire project area and have been reviewed by Forest Service biologists. Larch Mountain Salamander are found within 200' of the project area. Surveys did not identify Larch Mountain Salamander within the project footprint. The project is also within riparian priority habitat as addressed above in the Water Resources section. The following timing restrictions avoid impacts to other species within the project area:

- **It should be made a condition of approval that all blasting should not occur during the Northern spotted owl critical nesting season (March 1 – July 15).**
- **It should be made a condition of approval that falling of trees and shrubs should not occur during the critical migratory bird nesting season (March 1 – July 15).**
- **It should be made a condition of approval that any work in fish bearing streams, such as Warren Creek, occur during the appropriate In-Water Work Window (July 15 - September 30).**

D. The local government, in consultation with the State and federal wildlife biologists and/or botanists, shall use the following criteria in reviewing and evaluating the site plan to ensure that the proposed developments or uses do not compromise the integrity and function of or result in adverse affects to the wildlife or plant area or site:

(1) Published guidelines regarding the protection and management of the affected wildlife/plant species. Examples include: the Oregon Department of Forestry has prepared technical papers that include management guidelines for osprey and great blue heron; the Washington Department of Wildlife has prepared similar guidelines for a variety of species, including the western pond turtle, the peregrine falcon, and the Larch Mountain salamander.

(2) Physical characteristics of the subject parcel and vicinity, including topography and vegetation.

(3) Historic, current, and proposed uses in the vicinity of the sensitive wildlife/plant area or site.

(4) Existing condition of the wildlife/plant area or site and the surrounding habitat and the useful life of the area or site.
(5) In areas of winter range, habitat components, such as forage and thermal cover, important to the viability of the wildlife must be maintained or, if impacts are to occur, enhancement must mitigate the impacts so as to maintain overall values and function of winter range.
(6) The site plan is consistent with the "Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife Resources" (Oregon Department of Fish and Wildlife 2000) and the Washington guidelines when they become finalized.
(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 developments 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 (such as old growth forests, talus slopes, and oak woodlands) as listed on the following Priority Habitats Table. This includes maintaining structural, species, and age diversity, maintaining connectivity within and between plant communities, and ensuring that cumulative impacts are considered in documenting integrity and function.

Priority Habitats Table	
Priority Habitats	Criteria
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.

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 sensitive wildlife area or site is not active, or (2) the proposed use is not within the buffer zones and would not compromise the integrity of the wildlife/plant area or site, and (3) the proposed use is within the buffer and could be easily moved out of the buffer by simply modifying the project proposal (site plan modifications). If the project applicant accepts these recommendations, the local government shall incorporate them into its development review order and the wildlife/plant protection process may conclude.

F. If the above measures fail to eliminate the adverse affects, 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.

Findings: The project will result in permanent modification of habitat within the buffer of Larch Mountain Salamander. Considering this the proposal was evaluated for the Practicable Alternative Test which is addressed in subsequent findings. The basic purpose of the proposed activity it is to connect remnant segments of the Historic Columbia River Highway with a state trail that provides for safe pedestrian, bicyclist and ADA use. HCRH State Trail standard design guidelines were developed to address this need. The proposed alignment was selected because it resulted in the least amount of impact to sensitive habitats including Larch Mountain Salamander habitat while meeting these design guidelines. Alternative alignments would not have met the basic need and the impacts to Larch Mountain Salamander are not direct. Additionally alternative alignments would have resulted in a greater impact to riparian 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.

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.

Findings: Field survey results have been evaluated by Forest Service specialists in coordination with appropriate state agencies.

H. The local government shall require the project applicant to revise the mitigation plan as necessary to ensure that the proposed use would not adversely affect a sensitive wildlife/plant area or site.

Findings: A mitigation plan has been prepared by the applicant who addresses impacts to Larch Mountain Salamander. Refer to the Mitigation Plan findings for additional information.

I. Determination of potential natural resources effects shall include consideration of cumulative effects of proposed developments within the following areas: 1) sites within 1,000 feet of sensitive wildlife areas and sites; and 2) sites within 1,000 feet of rare plants. *(Added: U.S. Sec. Ag. concurrence 7/1/11)*

Findings: Cumulative Effects to Natural Resources

Fish Species
Historically, the quality of fish habitat in many of the Oregon side tributaries in the Columbia River was reduced when streams were channeled to go under the freeway. This project (i.e. constructing a bridge outside of bankfull at Warren Creek and constructing a bike path in the adjacent flood plain) does little to add to the cumulative effects to fish either spatially or temporarily.

Wildlife
This segment of the Historic Bike path is close to the freeway, and minimal dispersal habitat is being removed by building a bike path near the freeway when also taking into account similar actions occurring adjacent to and linked to this segment. However, there may be adverse cumulative effects if in the future other similar recreational paths are built adjacent to this Historic Highway project. Eventually, the quality of habitat to northern spotted owls and/or other interior forest species may be compromised.

Watershed
The spatial boundary for water resource effects from the proposed trail development is the area between the Columbia River up to the top of the Warren Creek and Wonder Creek watersheds. This spatial extent is considered to be representative of the majority of species within the project area that are affected by the proposed project. The temporal effects of this project are anticipated to be over 80 years as this is the approximate time it would take for a mature tree to grow. Past impacts from the construction of railroads, the Historic Columbia River Highway and I-84 have resulted in the currently modified stream conditions. All connectivity of the uplands to the Columbia has been severely impeded. Most of the streams in this area have been channelized or modified to impede or prevent fish and wildlife access along the streams or to the Columbia. Habitat function has been impacted by these activities. It is critical that future activities avoid effect to these water resources so as they do not result in more than moderately adverse impacts. The

construction of the proposed trail would result in additional modification and channelization of these creeks and come extremely close to moderately adverse impacts. However, this proposal would result in less than moderately adverse impacts but any additional trails or developments would. Considering this, any future projects in this area would result in more than moderate adverse impacts to a host of riparian, wildlife, plants and other species. Any additional stream channelization of other related developments would likewise cause cumulatively adverse impacts.

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.

Findings: The proposal includes multiple best management practices for controlling soil erosion and stream sedimentation as described in the submitted Erosion Control Plan. Best management practices include features such as silt fencing, wattles and compost blankets as appropriate to prevent soil movement. Considering the erosion control measures the project will not exceed soil productivity standards for area of soil disturbed.

- **It should be made a condition of approval that all areas of soil disturbance should be seeded and/ or planted with native grass/forb species to establish 80% cover within 1 year of project completion.**

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, wildlife or plant areas and/or sites).

Findings: The proposed development is within the buffer of multiple water resources and Larch Mountain Salamander.

   B. There is no practicable alternative (see the “practicable alternative” test).

Findings: There is not a practicable alternative to the proposal that would meet the basic intent of the project and result in less impacts to natural resources.

2. In all cases, Mitigation Plans are the responsibility of the applicant and shall be prepared by an appropriate professional (botanist/ecologist for plant sites, a wildlife/fish biologist for wildlife/fish sites, and a qualified professional for water resource sites).

Findings: The mitigation plan was submitted by the applicant and prepared by professional biologists/ ecologists.

3. The primary purpose of this information is to provide a basis for the project applicant to redesign the proposed use in a manner that protects sensitive water resources and wildlife/plant areas and sites, that maximizes his/her development options, and that mitigates, through restoration, enhancement, and replacement measures, impacts to the water resources and/or wildlife/plant area or site and/or buffer zones.

Findings: Sensitive natural resources were identified early in the design process by field surveys. The design incorporated consideration of these resources as documented in the practicable alternative test. Unavoidable impacts to natural resources will occur and the mitigation plan addresses how these impacts will be minimized and offset.

4. The applicant shall submit the mitigation plan to the local government. The local government shall submit a copy of the mitigation plan to the Forest Service, and appropriate state agencies. If the final decision contradicts the comments submitted by the state and federal wildlife agency/heritage program, the local government shall justify how it reached an opposing conclusion.

Findings: Forest Service resource specialists have reviewed the mitigation plan and coordination with the state and federal agencies has occurred.

6. Mitigation plans shall include maps, photographs, and text. The text shall:
   A. Describe the biology and/or function of the sensitive resources (e.g. wildlife/plant species or wetland) that will be affected by a proposed use. An ecological assessment of the sensitive resource to be altered or destroyed and the condition of the resource that will result after restoration will be required. Reference published protection and management guidelines.

Findings: The biology of the Larch Mountain Salamander and function of the water resources are addressed in the mitigation plan and associated biological reports.

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

Findings: The mitigation plan and associated documents address the current conditions and proposed activities in context of impacts to sensitive species.

C. Explain the techniques that will be used to protect the sensitive resources and their surrounding habitat that will not be altered or destroyed (for example, delineation of core

habitat of the sensitive wildlife/plant species and key components that are essential to maintain the long-term use and integrity of the wildlife/plant area or site).
D. Show how restoration, enhancement, and replacement (creation) measures will be applied to ensure that the proposed use results in minimum feasible impacts to sensitive resources, their buffer zones, and associated habitats.

Findings: The project alignment and design has been guided by information provided in initial natural resource surveys. The project avoids to the maximum extent practicable sensitive areas while still meeting the basic purpose of the trail. Some impacts to buffer zones will occur. Detailed mitigation measures have been developed and outlined in the mitigation plan such as erosion control, hydrology, talus/ Larch Mountain Salamander habitat enhancement, and Biologist presence during implementation.

- **Considering the mitigation plan was developed after submittal of the project application the Mitigation Plan dated November 6, 2014 should be implemented and modified to meet additional conditions of approval including:**
  - **Performance Standards should be modified to:**
    - **Cover. Percent cover of native species shall exceed, 20, 40 and 80 percent on years 1,3 and 5.**
    - **Diversity. Five or more woody species will be present in native plant cover and contribute to at least 5 percent of total cover.**
    - **Noxious weed cover. Noxious weed cover (see Oregon Noxious Weed Lists A and B) will be reduced to no more than 20% by year 3 and 10% by year 5. Adaptive management may include replanting, reseeding, noxious weed removal, mulching, improving soil quality and watering.**
  - **The entire mitigation area outlined in the mitigation plan will begin implementation with the construction of this segment of trail (segment D). Future segments of trail (segments A-C) construction will require additional analysis to ensure adequacy of proposed mitigation.**
  - **The applicant should be responsible for ongoing implementation, maintenance and monitoring of mitigation. Should monitoring indicate that enhancement efforts are not meeting the outlined objectives in the proposed timeline, the applicant should continue mitigation activities until enhancement objectives are achieved.**
  - **Best Management Practices should be implemented for all development occurring within a stream or wetland buffer to prevent sedimentation from entering nearby water features. Best Management Practices should include, at minimum, waterbars or other erosion control measures, such as weed-free straw wattles or silt fencing where needed to control sedimentation and erosion during project activities and reduce the potential for erosion after the construction activities are complete. Structures used for this purpose should not be left on the site permanently.**
  - **Fuel should not be stored within 150' of streams.**
  - **Equipment should not be refueled within 150' of streams**

- **Wash water from concrete and other activities should not be allowed to enter streams.**
- **The applicant should request permission prior to using water sources on National Forest System land to ensure timing and protection measures are utilized.**
- **Existing tree cover should be retained as much as possible. The number of trees removed should be the minimum necessary to complete the project.**
- **Existing down wood should be retained onsite and kept whole.**
- **Leave all trees felled on National Forest land on-site.**
- **Any trees or limbs cut should not be bucked, but left where they are felled or moved aside if needed for safety or operational purposes.**
- **In order to prevent spread of invasive species during construction, all imported materials and heavy equipment should be inspected prior to entry onto NFS land to ensure they are free of invasive species and debris which may harbor invasive species.**
- **Erosion control measures will be employed to retain any exposed material and sediment on-site and prevent project-related sediment from reaching live water bodies.**
- **Any ground disturbed near Warren Creek will be seeded with native seed mix and covered with certified weed-free straw or mulch.**

E. Show how the proposed restoration, enhancement, or replacement (creation) mitigation measures are NOT alternatives to avoidance. A proposed development/use must first avoid a sensitive resource, and only if this is not possible should restoration, enhancement, or creation be considered as mitigation. In reviewing mitigation plans, the local government, appropriate state agencies, and Forest Service shall critically examine all proposals to ensure that they are indeed last resort options.

Findings: The applicant designed the project to avoid impacts to natural resources to the maximum extent practicable.

7. At a minimum, a project applicant shall provide to the local government a progress report every 3 years that documents milestones, successes, problems, and contingency actions. Photographic monitoring stations shall be established and photographs shall be used to monitor all mitigation progress.
8. A final monitoring report shall be submitted to the local government for review upon completion of the restoration, enhancement, or replacement activity. This monitoring report shall document successes, problems encountered, resource recovery, status of any sensitive wildlife/plant species and shall demonstrate the success of restoration and/or enhancement actions. The local government shall submit copies of the monitoring report to the Forest Service; who shall offer technical assistance to the local government in helping to evaluate the completion of the mitigation plan. In instances where restoration and enhancement efforts have failed, the monitoring process shall be extended until the applicant satisfies the restoration and enhancement guidelines.

Findings: The proposal will exceed this standard by submitting annual monitoring reports.

9. Mitigation measures to offset impacts to resources and/or buffers shall result in no net loss of water quality, natural drainage, fish/wildlife/plant habitat, and water resources by addressing the following:
   A. Restoration and enhancement efforts shall be completed no later than one year after the sensitive resource or buffer zone has been altered or destroyed, or as soon thereafter as is practicable.

Findings: The applicant prepared a mitigation plan to address impacts to natural resources from the implementation of this proposal (segment D) and anticipated future proposals for HCRH state trail development. As outlined in the mitigation plan, implementation would be phased as respective segments of trail are implemented. These findings only address adequacy of the mitigation plan for Segment D. Future segments of trail alignment and proposed mitigation will need additional evaluation to ensure the proposed mitigation is commensurate with the respective future impacts.

Implementation of the proposed mitigation for Segment D will begin within one year of impacts to natural resources.

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

Findings: The proposal is consistent with this guideline.

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

Findings: Areas temporarily impacted will be vegetated with native plant species to replicate the original native vegetation community.

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

Findings: Impacts to approximately 2.03 acres (including impacts on state land) of sensitive resource buffers is proposed to be offset by 1.2 acres of forest habitat enhancement on National Forest System land. Proposed enhancement includes extensive weed control, native planting, maintenance and monitoring. In order for the project to not result in a net loss of resource function is should be made a condition of approval that:

- **2.03 acres of the proposed mitigation area should be allocated for impacts from segment D (including impacts on state land from segment D).**

F. Nonstructural controls and natural processes shall be used to the greatest extent practicable.

(1) Bridges, roads, pipeline and utility corridors, and other water crossings shall be minimized and should serve multiple purposes and properties.

(2) Stream channels shall not be placed in culverts unless absolutely necessary for property access. Bridges are preferred for water crossings to reduce disruption to hydrologic and biologic functions. Culverts shall only be permitted if there are no practicable alternatives as demonstrated by the 'Practicable Alternative Test'.

(3) Fish passage shall be protected from obstruction.

(4) Restoration of fish passage should occur wherever possible.

Findings: A bridge is proposed over Warren Creek. This design was selected to minimize the area of riparian buffer affected by the proposed project and to be high enough above the creek to accommodate the hydrologic regime of Warren Creek. The proposed project would not result in additional fish passage barriers.

(5) Show location and nature of temporary and permanent control measures that shall be applied to minimize erosion and sedimentation when riparian areas are disturbed, including slope netting, berms and ditches, tree protection, sediment barriers, infiltration systems, and culverts.

(6) Groundwater and surface water quality will not be degraded by the proposed use. Natural hydrologic conditions shall be maintained, restored, or enhanced in such a manner that replicates natural conditions, including current patterns (circulation, velocity, volume, and normal water fluctuation), natural stream channel and shoreline dimensions and materials, including slope, depth, width, length, cross-sectional profile, and gradient.

Findings: The proposal includes an erosion control plan to avoid soil movement and sedimentation. The project has been modified and designed to accommodate the existing hydrologic patterns of Warren and Wonder Creeks.

(7) Those portions of a proposed use that are not water-dependent or that have a practicable alternative will be located outside of stream, pond, and lake buffer zones.

Findings: Development within the buffer zones is limited to what is necessary to meet the basic purpose of the project.

(8) Streambank and shoreline stability shall be maintained or restored with natural vegetation.

Findings: All disturbed areas will be stabilized and vegetated with native species.

RECREATION RESOURCES

The Management Plan, Part II, Chapter 4 (Recreation Resources), SMA guidelines, state:

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

Findings: The project is not expected to displace existing users, however visitor experience for those hiking the Starvation and Mt Defiance trails may be negatively affected by the level of development the HCRH Trail. Typically hikers using the Starvation and Mt Defiance trails are seeking a challenging primitive experience. Accessing these trails via the HCRH will detract from their experience albeit for a very short duration. The following conditions should be placed to avoid short term temporary impacts to recreationists:

- **Steps should be taken to keep the Hole-in-the-Wall Falls and Mt. Defiance trails open to the public while geotechnical work is being conducted. The Forest Service should be notified two weeks prior to construction.**
- **Temporary signs at all likely access points to and from the Starvation Ridge/Mt Defiance trailhead on I-84 should be posted, explaining the project and its expected duration.**
- **For public safety, signs should be posted to alert trail users when activities are occurring on or near trails.**

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

Findings: See following findings for Recreation Intensity Classes.

Overall the project is not expected to result in adverse effects (including cumulative effects) to recreation resources. It will likely enhance recreation resources by providing additional opportunities for walking, biking and disable users in a relatively "wild" setting. It meets the intent of the CRGNSA Act and Management Plan by connecting intact and usable highway segments with recreation trails to create a continuous route (Part 3, Chapter 1, Recreation Development Plan) and is consistent with recommendations in The Columbia Tributary East Watershed Analysis/Open Space Plan.

Reconnecting the entire HCRH will likely bring more visitors to the Gorge particularly to road bike. Gorge communities are anticipating the benefits of increase bicycle tourism to enhance economic development within their communities. A study prepared by Dean Runyan Associates (Columbia River Gorge Bicycle Recreation Economic Forecast for the Communities Along the HCRH, 2014) suggests that there could be 10% annual increase in bicycle use when there is an ongoing pattern of trail investment and/or expansion and knowledge of the trail as a recreation destination. Over the long-term this increase could have the unintended consequences of exacerbating congestion and overall feeling of crowdedness on the Oregon side of the Gorge. The USFS, OPRD and ODOT should continue to explore ways to reduce congestion and other associated impacts from this use

along the HCRH corridor.

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

Findings: The proposal includes occasional motor vehicle use as part of the recreation activity. In order for the proposed activity to meet this guideline the following should be required:

- **Motorized recreation should be prohibited.**

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

Findings: No adverse effects (including cumulative effects) to recreation resources are anticipated.

5. The facility guidelines are intended to apply to individual recreation facilities. For the purposes of these guidelines, a cluster or grouping of recreational developments or improvements located relatively close to one another is considered an individual recreation facility. Developments 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).
9. The recreation intensity classes are designed to protect recreation resources by limiting land development and land uses.

Findings: See following findings for Recreation Intensity Classes.

SMA Provisions: Recreation Intensity Classes

1. Recreation Intensity Class 1 (Very Low Intensity)
The emphasis is to provide opportunities for semi-primitive recreation.
A. Permitted uses are those in which people participate in outdoor activities to realize experiences such as solitude, tension reduction, and nature appreciation.
B. The maximum site design capacity shall not exceed 35 people at one time on the site. The maximum design capacity for parking areas shall be 10 vehicles.
C. 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.

Findings: The proposed project is within Recreation Intensity Class 1 which emphasizes "semi-primitive" recreation opportunities where people can participate in recreation activities to realize experiences such as solitude, tension reduction and nature appreciation.

"Semi-primitive" as described in the Recreation Opportunity Spectrum (ROS) is characterized by an area that is "predominately natural or natural appearing environment of moderate to large size. Interaction between users is low, but there is often evidence of other users. The area is managed in such a way that minimum onsite controls and restrictions may be present, but is subtle." Semi-primitive is further described as an "area that is at least ½ mile, but not further than 3 miles from all roads, railroads and trials with motorized use." "The natural setting may have subtle modifications that would be noticed but not draw attention of the observer." Social encounters can vary between 6 to 15 parties per day on trails.

The current condition of the planning area does not meet semi-primitive as defined by ROS. While social encounters are likely within the semi-primitive threshold for the area, the area is highly modified with sights and sounds of humans very evident. However within the context the Columbia River Gorge National Scenic Area, designated RIC 1 include a range of recreation settings and experiences from areas where human influence is clearly evident to areas where a semi-primitive experience (as defined above) can be realized. In general, RIC 1 designations within the I-84 corridor are characterized by a relatively high intensity of development and evidence of human intervention within a 1/2 mile to a 1 mile of I-84. Given this frame of reference one can conclude that the proposed development is not out of character for RIC 1 designations within the I-84 corridor.

Realizing the opportunity for solitude is difficult at best to achieve in the planning area when you consider the proximity of I-84 and the railroad. The sights and sounds of human activity are readily evident, however this does not seem to discourage recreationist from visiting the area. Overall nearly half of all visitors to the Gorge recreate in the CRGNSA because it's a good place to participate in recreation activities. On average, visitor perceptions of crowding is relatively low with over half feeling not crowded at all or slightly crowded. Within the context of the RIC 1 designations in the I-84 corridor the opportunity to experience solitude in the planning area is not out of character.

H. Conclusion

The proposed Historic Columbia River Highway State Trail (Segment D on National Forest System land) is 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.