Cascade Locks Trail System

Hood River County, OR

Final Decision Notice and Finding of No Significant Impact and Consistency Determination (CD-21-01-S)

Introduction

The Forest Service proposed to develop a 14.8-mile, shared-use trail system on National Forest System (NFS) lands surrounding Cascade Locks and within the Columbia River Gorge National Scenic Area (CRGNSA) and Hood River County, Oregon. The purpose of this project is to help meet the growing demand for mountain biking opportunities in the Pacific Northwest consistent with the 1986 Columbia River Gorge National Scenic Area Act. This project, developed in coordination with the Port of Cascade Locks and responsive to the 2019-2023 Oregon Statewide Comprehensive Outdoor Recreation Plan, envisions a trail system to connect to the existing Gorge 400 Trail, Herman Creek Trail, and Pacific Crest National Scenic Trail (PCT) and expand biking, hiking, and equestrian trail opportunities near the community of Cascade Locks.

A Draft Environmental Assessment was prepared by the Forest Service and made available for public review and comment March 3 through April 2, 2021. A Final Environmental Assessment is now available. This Finding of No Significant Impact and Decision Notice identifies the selected alternative and rationale for the decision. The environmental analysis is conducted according to the Council on Environmental Quality's (CEQ) 1978 regulations for implementing the procedural provisions of the National Environmental Policy Act (NEPA, 40 Code of Federal Regulations (CFR) §§1500-1508, as amended). The CEQ issued revised regulations for implementing the procedural provisions of NEPA effective September 14, 2020. The revised regulations provide the responsible official the option of conducting an environmental analysis under the 1978 regulations if the process was initiated prior to September 14, 2020 (40 CFR §1506.13, 85 FR 137, p. 43373, July 16, 2020). This project was initiated with public scoping in August 2018 and so the environmental analysis and decision is conducted under the 1978 CEQ NEPA regulations rather than the 2021 CEQ NEPA regulations.

Decision and Reasons for the Decision

Based upon my review of the environmental analysis I have decided to implement the action as described in the Final Environmental Assessment to develop a 14.8-mile shared use trail system on NFS lands surrounding the community of Cascade Locks, subject to the requirements in Appendix A. The determination of consistency with the Management Plan for the CRGNSA (2004, as updated through 2016) was conducted concurrently with the environmental analysis. The CRGNSA Findings of Fact and Consistency Determination are referred to as CD-21-01-S.

The western portion of the new trail will begin and end within the designated urban area of Cascade Locks south of Interstate Highway 84 (I-84) and will run west to east, crossing Dry Creek by way of a new trail-specific bridge and generally paralleling the existing Bonneville Power Administration (BPA) powerline corridor (Figure 1). The eastern portion of the trail generally parallels Wyeth Road between the BPA powerline corridor and I-84 (Figure 2). Several trail segments will connect with existing NFS trails including the PCT. The Historic Columbia River Highway State Trail also passes through this area. Trail routes have been designed to avoid known sensitive resources based on completed field surveys.

The new trail system will include construction of a 50-foot, steel truss bridge (minimum 4-foot width) over Dry Creek in the western portion of the project area and hardened fords in other intermittent stream crossings. The project also includes development of a 25-vehicle trailhead on Wyeth Road. that will serve as the primary access point for mountain bikers. The trailhead will be designed to include two parking spaces for oversized vehicles (e.g. vans or vehicles hauling trailers); a three-panel information board; a double-vault waterless restroom; trash receptables; and a bike fix-it station. Visitor amenities will meet Forest Service guidelines for a standard amenity fee site and the Forest Service proposes to charge a day use fee at the trailhead to help cover operation and maintenance costs.

To minimize resource impacts from new ground disturbance, the trail system will incorporate several previously disturbed corridors (e.g. old roadbeds, powerline corridor, and powerline access roads) and connect with existing system trails. The new trail system will connect to the PCT, Gorge 400 Trail, and Herman Creek Trail creating multiple, interconnecting mountain biking, hiking, and equestrian loop trail opportunities. A 0.2-mile section of the PCT near the SW Moody Avenue trail access point in Cascade Locks will be re-routed in order to discourage mountain biking on the PCT, which is only open to hiking and equestrian use.

Table 1. Cascade Locks Trail System - Proposed New Trails

Allowed uses	Miles of new trail
Hiking, Biking	8.49
Hiking, Biking, Equestrian	6.10
Hiking, Equestrian (PCT Re-Route)	0.20
TOTAL	**14.79**
* Approximately 1.18 miles of new trail construction will utilize existing roadbeds including FSR 8400022 (.30 miles), FSR 8400024 (0.61 miles), FSR 8400218 (.22 miles) and FSR 8400222 (.05 miles).	

Public Involvement and Scoping

The Cascade Locks Trail System was listed in the Schedule of Proposed Action in June 2017. The Forest Service mailed a letter describing the proposed action and requesting comments to partner agencies and interested parties on August 6, 2018. Comments received were used to inform the project development and design. During project development, the Forest Service also worked closely with a group of key stakeholders (including the Port of Cascade Locks, International Mountain Bicycling Association, Northwest Trail Alliance, Pacific Crest Trail Association, and Oregon Equestrian Trails) to complete a conceptual plan for the trail system, perform initial trail layout, conduct resource surveys, and develop a proposed action. A Draft Environmental Assessment was prepared and open for public comment March 3 through April 2, 2021. Specific design and implementation recommendations made by commenters have been incorporated into the Final Environmental Assessment to inform this decision. Consultation with Oregon State Historic Preservation Office, Tribes, the US Fish and Wildlife Service, and BPA have concluded. Where applicable, requirements that resulted from these consultation processes have been incorporated into this Decision Notice and will be carried out during project implementation.

Figure 1.Cascade Locks Trail System (West)

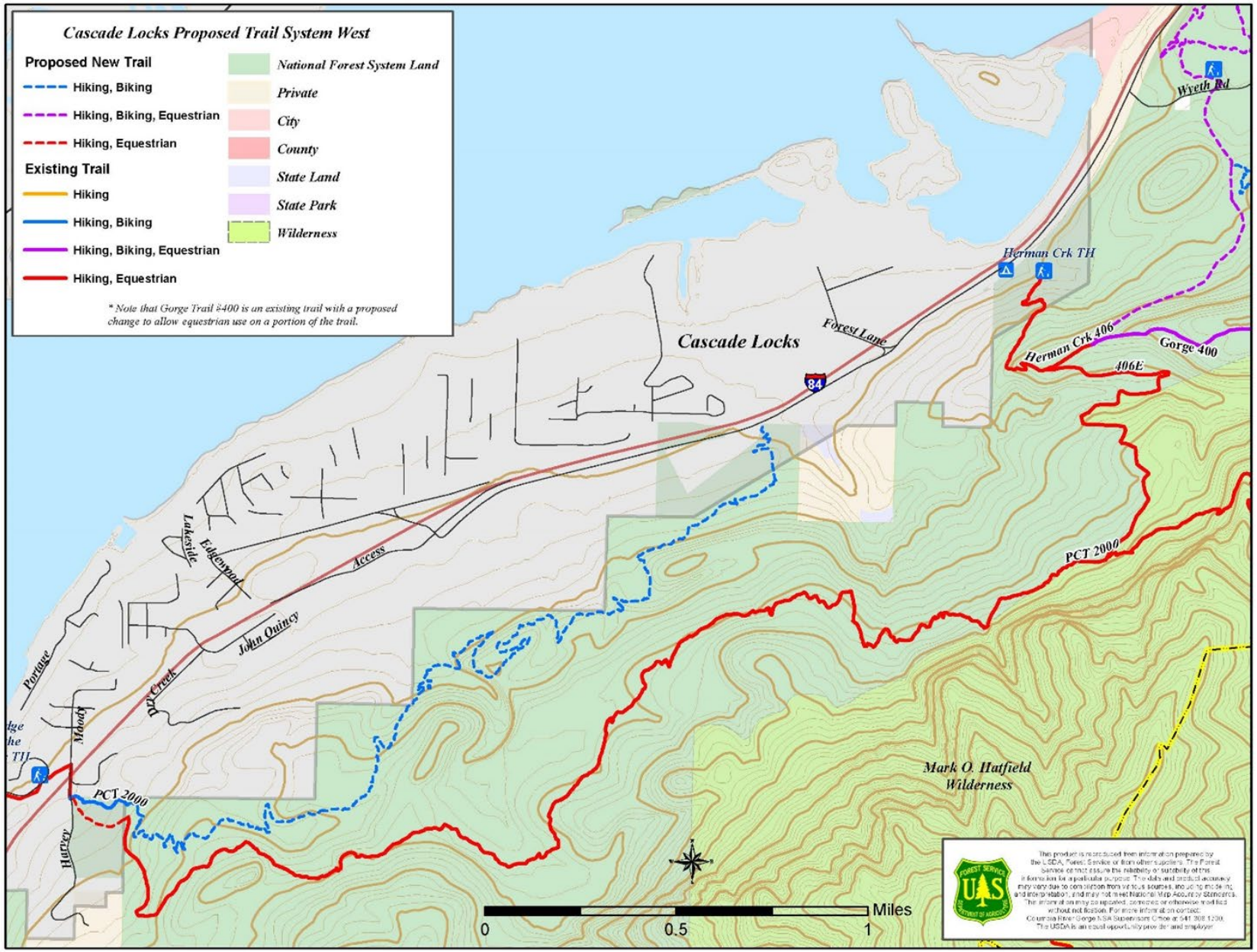
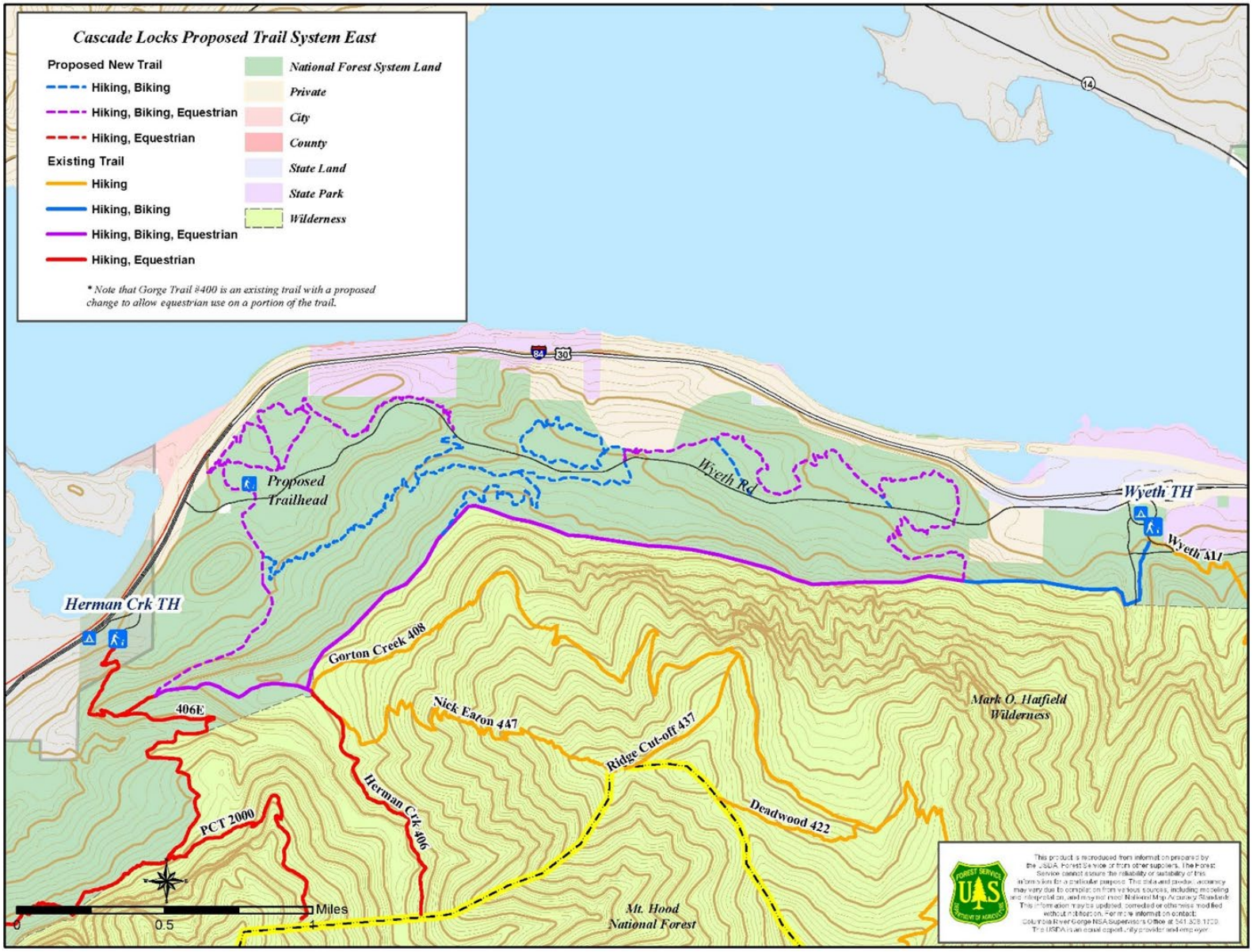


Figure 2. Cascade Locks Trail System (East)



Finding of No Significant Impact

Context

This discussion of the project's context provides meaning to the intensity of effects described below to support the rationale for a finding of no significant impact related to each factor.

The geospatial context of the environmental effects for the selected action is based on the analysis in the Final Environmental Assessment and related field surveys for the construction and/or designation of 14.8 miles of new system trail, one trail bridge, four hardened fords, and a new trailhead affecting approximately 12.6 acres of land. The proposed project is located on NFS lands surrounding Cascade Locks, Oregon and within the CRGNSA and Hood River County. The project area is located on low elevation lands (300 to 1,000 feet) in the Western Cascades with vegetation consisting primarily of western hemlock, Douglas fir, big-leaf maple, and cottonwood and some scattered oaks. The proposed trail crosses the lower sections of the Eagle Creek and Mosier Creek watersheds and the Carson Creek, Herman Creek, and Grays Creek subwatersheds.

Intensity

Intensity is a measure of the severity, extent, or quantity of effects, and is based on information from the analysis presented in the Final Environmental Assessment and the references in the project record. The effects of this project have been appropriately and thoroughly considered with an analysis that is responsive to concerns and issues raised by the public. The agency has taken a hard look at the environmental effects using relevant scientific information and knowledge of site-specific conditions gained from field visits. My finding of no significant impact is based on the context of the project and intensity of effects using the ten factors identified in 40 CFR 1508.27(b).

1) Impacts may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on the balance the effects will be beneficial.

This project is not expected to have significant adverse effects and will have beneficial effects on recreational opportunities consistent with the Management Plan for the CRGNSA (2004, as updated through 2016). Effects, both adverse and beneficial, are disclosed in the Final Environmental Assessment. The project was designed with best management practices (see pages 12-16 and page 34 of the Final Environmental Assessment) to avoid and minimize impacts to natural and cultural resources during project design and construction. Additional terms and conditions, mitigation measures, and monitoring from consultation and discussion with the Tribes, the U.S. Fish and Wildlife Service, and BPA have been incorporated into the final Decision Notice to further reduce impacts.

2) The degree to which the proposed action affects public health or safety.

There are no adverse impacts expected to public health or safety. User safety has been incorporated into the layout and design of the trails, stream crossings, and trailhead. Signs are incorporated to promote safety awareness among users and to minimize trail conflicts. Mountain bike trails designed for beginner and intermediate levels (an under-represented trail type in this area) will promote safe riding while allowing riders to build skills for more advanced trails. With these measures in place, and modern engineering of trail tread and water crossings, the project is expected to enhance user safety.

3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

Surveys have been completed for the new trails and amenities and the layout has been designed to avoid and/or protect any known unique characteristics of the geographic area. Best management practices have been included in the project design to further reduce the potential for impacts to known or unknown unique resources.

4) The degree to which the effects on the quality of the human environment are likely to be highly controversial.

The concept for this project dates back to 2005. During the intervening 16 years extensive stakeholder engagement has taken place in a variety of forums. In 2018 the project was submitted for public scoping and in 2021 for public review and comment of the Draft Environmental Assessment. Consultation with Oregon State Historic Preservation Office, Tribes, US Fish and Wildlife Service, and BPA is complete. None of these processes have determined any degree of scientific controversy regarding the anticipated effects of this project.

5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

There are no uncertain effects or unique risks associated with this project. The Forest Service has extensive experience constructing trails, trailheads, and water crossings according to established agency standards. Furthermore, the CRGNSA manages similar facilities and has incorporated signs and amenity designs to accommodate the expected visitor use.

6) The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.

This project is not likely to establish a precedent for future action. It provides useful connections within the existing trail system while meeting the unmet needs of specific user groups in the Cascade Locks area.

7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.

The project identified in this Decision Notice is specific to NFS lands but is part of a larger and well thought out design for a system of trails existing or to be constructed/developed on both federal land and non-federal lands. Some of the trail segments in this project are designed on existing travel ways to avoid new construction impacts. The larger vision of a trail network does not constitute a cumulatively significant impact.

8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in the National Register of Historic Places or may cause loss or destruction of significant cultural or historical resources.

The Forest Service conducted project-level consultation for the project with the Oregon State Historic Preservation Office (OR SHPO) and Tribes in October 2015. The OR SHPO concurred with the assessment of effect of "No historic properties affected (36 CFR 800.4 (d)(1))". No other consulting parties responded. A preliminary scoping letter describing the proposed action and requesting comments was emailed to Tribes on August 6, 2018.

Additional consultation for the project was initiated on December 3, 2019 after slight changes were identified in the area of potential effect and required additional cultural resource survey work. Through the Section 106 process, the Forest Service consulted with the Confederated Tribes and Bands of the

Yakama Nation, Confederated Tribes of Warm Springs, Confederated Tribes of the Umatilla Indian Reservation, Nez Perce Tribe, and the Confederated Tribes of Grand Ronde. All consulting parties were sent the final cultural resource survey report addendum on February 26, 2020. Both OR SHPO and the Confederated Tribes of Warm Springs concurred with the assessment of effect of "Historic properties affected" (36 CFR 800.4 (d)(2)), "No adverse effect" (36 CFR 800.5(b)). No other consulting parties responded.

9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act.

The Cascade Locks Trails project will have no effect to federally listed species.

The development of the proposed trails and trailhead directly affects approximately 12.6 acres of land. However, over the project area this acreage does not significantly degrade habitat for any species. The project's scale and expected intensity of use (year-round, but most likely spring through fall when dry) from hikers, bikers, and equestrians, will not adversely impact habitat for federally listed species. Individuals might be impacted during trail construction, and individual animals might choose to move away from the trail area used by humans, but this will not result in a loss of populations, cause a trend toward federal listing, or cause a loss of viability for any of these species.

The project was included in the 2014 Willamette Planning Province Biological Assessment of Not Likely to Adversely Affect projects with the potential to modify the habitat for northern spotted owls, and received a Letter of Concurrence from U.S. Fish and Wildlife Service (ref. # 01EOFW00-2014-F-0221). In 2019, the US Fish and Wildlife Service informed the CRGNSA that project modifications did not require a re-initiation of consultation.

10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The Proposed Action will not violate federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the decision. The action is consistent with the Management Plan as described in Appendix B, Consistency Determination. The project is also consistent with the Roadless Area Conservation Rule and has been reviewed according to the Forest Service implementation policies of the Rule. The project also complies with Executive Order 12898 regarding environmental justice. No disproportionately high adverse human or environmental effects on minorities and/or low-income populations were identified during the analysis or public scoping process. Compliance with other federal environmental laws is documented in the project record.

Conclusion

After considering the environmental effects described in the Final Environmental Assessment and specialist reports, I have determined that the Selected Action will not have significant effects on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared.

Findings Required by Other Laws and Regulations

Columbia River Gorge National Scenic Area Act of 1986

The Act requires that all new development and land uses be reviewed for consistency with the Act. The consistency determination is a separate review from the environmental analysis and federal NEPA decision completed by the authorizing Federal Agency. The Forest Service office in Hood River, Oregon

has been delegated the authority to review federal projects for consistency with the Act and the Management Plan for the CRGNSA. Concurrent with the pre-decisional administrative review period described below, a Findings of Fact and Consistency Determination has being prepared and a public review process for this project as required by the Management Plan for the CRGNSA was completed (2004, as updated through 2016).

National Forest Management Act

The Mt. Hood National Forest Land and Resource Management Plan (Forest Plan) as amended is applicable where the Management Plan for the CRGNSA has less stringent provisions or does not speak to the applicable protection measures or management guidelines. The Final Environmental Assessment is tiered to, and incorporates by reference, the Mt. Hood National Forest Land and Resource Management Plan Final Environmental Impact Statement and Record of Decision. The Forest Plan describes resource management practices, levels of resource production and management, and the availability and suitability of lands for resource management. This project was determined to be consistent with all Forest Plan Standards and Guidelines as amended.

Pre-Decisional Administrative Review

The Cascade Locks Trail System is subject to pre-decisional administrative review (objection) pursuant to 36 CFR Part 218, Subpart B. The 45-day objection filing period begins the day following publication of the legal notice for the opportunity to file an objection in the *Columbia Gorge News*, the newspaper of record. The legal notice was published May 19, 2021 and the objection filing period closed July 7, 2021. No objections were received.

Implementation

No objections were filed within the 45-day time period, and implementation of the decision may occur after the issuance of this Finding of Effects and Consistency Determination for the CRGNSA.

Contact Information

For more information about the project, please contact Lorelei Haukness, Recreation Program Manager, lorelei.haukness@usda.gov; (541) 308-1703; USFS-CRGNSA, 902 Wasco Ave, Suite 200, Hood River, OR 97031.

The Draft and Final Environmental Assessment and supporting documents are available for inspection online at *https://www.fs.usda.gov/project/?project=40896.* The project record is located at the USFS-CRGNSA office and is available for inspection by appointment.

Approval

DONNA MICKLEY Digitally signed by DONNA MICKLEY
Date: 2021.07.21 11:55:18 -07'00'

07-21-2021

DONNA MICKLEY — Date
Forest Supervisor
Columbia River Gorge National Scenic Area

Appendix A: Project Design Features and Monitoring Requirements

The following Project Design Criteria and Monitoring Requirements were disclosed in the Final Environmental Assessment. This list is provided for ease of reference as an appendix to the Decision Notice for the Cascade Locks Trails Project (2021). These requirements originated from the planning and design process and more complete documentation is provided in the Project Record. Unless noted, the requirements are considered non-discretionary and should be relayed to contractors, cooperators, and others involved in project implementation as appropriate. These Project Design Features may also be augmented by the Findings of Fact and Consistency Determination and the public review process for this project as required by the Management Plan for the Columbia River Gorge National Scenic Area (2004, as updated through 2016).

Wildlife and Fisheries

1. All felled trees will be left on site to contribute to coarse woody debris.
2. Trail layout will ensure that no trees greater than 30" diameter at breast height (dbh) will be removed during trail construction or maintenance unless the trees are classified as hazard or danger trees.
3. Trees between 18" and 30" dbh can be removed on a limited basis (averaging no more than one tree per 1,000 feet of trail) within the trail corridor.
4. Trees > 11 inches but < 18 inches dbh can be removed on a limited basis (averaging no more than one tree per 150 feet of trail) within the trail corridor.
5. To avoid potential noise disturbance to northern spotted owls, construction and maintenance activities requiring the use of chainsaws, heavy equipment, or helicopter support will only occur between July 16 and February 28, with the exception of trailhead development on Wyeth Road.
6. Construction of the bridge at Dry Creek crossing will occur during dry weather and an erosion control plan will be implemented to ensure sediment is not delivered into Dry Creek during construction.
7. Use appropriate Best Management Practices (such as those described in Appendix A of the Final EA) for four sections of trail through wet areas to minimize delivery of sediment. All fords in these wet areas should be hardened to minimize sediment delivery and erosion.
8. To protect habitat for sensitive salamander species, ground disturbance will be minimized, and no fill will be added to sections of trail crossing talus slopes or boulder fields.

Water Quality and Soil Productivity

1. Trails will be located, designed, and constructed to conform to the terrain, minimize erosion, provide suitable drainage, and provide adequate pollutant filtering between the trail and any nearby waterbodies. New and existing trails with moderate or high erosion potential should be monitored, maintained, and/or reconstructed to include necessary stabilization and drainage features that minimize trail tread erosion.
2. Prior to construction of the proposed trailhead on Wyeth Road and the trail bridge at Dry Creek crossing, contractors will develop sediment and erosion control plans that will be provided to the Forest Service hydrologist for approval. Sediment and stormwater controls will be installed prior to initiating surface-disturbing activities near sensitive areas.
3. Activities within and adjacent to riparian areas should not accelerate sediment delivery to streams, lakes, wetlands, seeps, and springs.
4. Prior to equestrian use being allowed on the Gorge Trail 400 and FSR 8400024, water resource crossings (including seep or stream crossings) and associated approaches will be upgraded to minimize erosion and sediment delivery to water resources.

5. Prior to new trail construction that encourages increased bicycle use on the Gorge Trail 400 and FSR 8400024, water resource crossings (including seep or stream crossings) and associated approaches will be upgraded to minimize erosion and sediment delivery to water resources.
6. To the extent practical, stream crossings will be oriented perpendicular to the channel; located where channels are narrow, straight, and characterized by stable soils; and designed to minimize restriction of flood flows and maintain floodplain connectivity. Low-water crossings will be designed to maintain the function and bedload movement of the natural stream channel and to minimize flow constriction, site disturbance, and channel blockage to the extent practicable. Unimproved fords will be located in stable reaches with a firm rock or gravel base that has sufficient load-bearing strength for allowed uses. Low-water crossings and ford approaches will be hardened, designed to minimize erosion, and constructed during dry season or during the in-water work period. Forest Service hydrologist will work with trail crews and partners to design sections of trail (existing and proposed) in sensitive areas, including stream crossings and seeps.
7. Bridge design for Dry Creek crossing will be of adequate length and with sufficient freeboard to avoid constricting the natural, active flow channel and minimize constriction of the overflow channel. Bridge approaches will be hardened and designed to minimize erosion. Bridge will be constructed during dry season or during the in-water work period.
8. The Forest Service will monitor trail conditions to identify drainage and trail surface maintenance needs and avoid, minimize, or mitigate adverse effects to soil, water quality, and riparian resources. As needed, additional drainage features, stabilization structures, and tread hardening will be used to address erosion issues. Forest Service will obliterate and rehabilitate unauthorized trails that result in adverse effects to soil, water quality, or riparian resources.
9. In the first year following surface disturbing activities, the percent effective ground cover by soil erosion hazard class (for areas outside of the trail prism and developed parking area), should achieve at least the following levels: 60% ground cover for low-moderate soil erosion hazard, 75% for severe soil erosion hazard, and 85% for very severe soil erosion hazard. Where effective ground cover standards cannot be achieved, disturbed areas should be rehabilitated prior to the first autumn high rainfall period.
10. Construction activities should maintain at least 95% ground cover (e.g. vegetation, duff, or litter) within riparian areas. Avoid ground disturbing activities in saturated soil areas where practicable.

Botany

Sensitive Plants

1. Trailhead development and trail construction and maintenance activities will limit unnecessary disturbance to intact native vegetation and habitats to the fullest extent possible.
2. The trail will be routed to avoid disturbance of dry cliff and rock-face habitat suitable for Howell's daisy (*Erigeron howellii*) and long-bearded hawkweed (*Hieracium longiberbe).*
3. If any new species or populations of sensitive plants are found during project implementation, these species will be considered as described in the policy guidelines found in FSM 2670 and the botanist shall be notified and appropriate measures taken to ensure avoidance and protections and determine next steps.
4. In order to protect *Lobaria linita* and *Hypogymnia duplicata* species and habitat, removal of any trees greater than 11” diameter at breast height will require prior consultation with the Forest Service botanist. No host trees will be removed; known locations will be buffered; and forest microclimate in immediate area will be maintained. A botanist trained in identification of these species will determine the appropriate site-specific buffer distance and final trail location.
5. Restoration and revegetation needed as a result of trailhead development and trail construction will be implemented in coordination with the botanist as needed. The planting and restoration plan will utilize only locally sourced native plant species.

Invasive Plants

1. Pre-implementation surveys should be conducted to ensure updated information on invasive plant infestations within project area. Where practical, treatment of non-native invasive plants should occur pre-implementation to prevent further spread.
2. Treatment of invasive *Ilex* should be conducted in the understory, to prevent further spread and alteration of forested habitat. This design criteria serves as a mitigation to potential encroachment of sensitive plant buffers.
3. Project design and construction will limit disturbance to existing populations of non-native invasive plants to the extent practicable.
4. The area disturbed during trailhead development (including parking area and trail connections) will be treated for non-native invasive plants to prevent spread along trail system and into native habitats. As practical, the larger trailhead area (a previously disturbed rock pit) should be treated for non-native invasive plants and restored to native vegetation.
5. To reduce the potential for transport or spread of invasive plants, all vehicles and equipment used during construction of the trailhead and trail system will be washed before entering NFS lands.
6. To reduce the potential for weed spread through fill material (e.g. gravel and rock), all materials used during construction and maintenance of the trailhead and trail system will be certified weed-free. In addition, all contract documents and volunteer agreements for work in the project area will include provisions requiring the use of weed-free materials.
7. Project area will be monitored for introduction of invasive plants and treatments conducted if deemed necessary by project botanist.
8. Invasive plant messaging will be posted at trailhead bulletin boards and boot brushes and bike cleaning stations will be installed if practicable at trailheads providing access to the system. Signage should encourage equestrians to use only weed-free feed for several days before travelling on NFS lands and to inspect, brush, and clean animals, especially hooves and legs, before entering public land. Signage should encourage bicyclists to inspect and clean bike to remove mud, plant parts and seeds.

Scenery and Visual Resources

1. The Wyeth Road trailhead will include careful siting and design features to ensure the not visually evident standard as seen from Key Viewing Areas (KVAs) and Scenic Routes is maintained. Where the use of natural topography is not feasible, constrained use of earthen berms (designed to fit with scale and proportion of landforms common to the landscape setting), in combination with medium to tall structured native trees and vegetation, shall be used to achieve the standard of not visually evident.
2. Except as is necessary for construction of parking area, access road, and toilet building, existing tree cover screening the proposed trailhead from key viewing areas and scenic routes shall be retained.
3. All materials shall be of dark, earth-toned colors found in the project area; resemble natural materials (stone, wood); retain distinctive and/or common characteristics of the landscape setting; and ensure constructed features do not become visually dominant as seen from KVAs and Scenic Routes. All wood and stone materials will be of a color and type found in the area vicinity and characteristic to the Landscape Setting of the area.
4. Structures shall have a rustic appearance, use non-reflective materials, and have low contrast with the surrounding landscape. Material selection for fence, stone, surfacing, picnic tables and all other amenities associated with site development will have final approval by Forest Service scenic specialist.

Recreation

1. Information about user etiquette on shared trail systems will be posted at Forest Service trailheads at Herman Creek and Wyeth Road. Additional steps to minimize user conflict and promote public safety will be taken if monitoring indicates the need. If monitoring indicates that user conflict is a concern on portions of the trail system, additional signage will be installed to remind visitors of trail courtesy protocols and speed recommendations.
2. Trails will be clearly marked to ensure visitors know which uses are allowed on which sections of trail. A stepover feature will be constructed on the PCT (near trailhead on Moody Ave.) to discourage bike access. The Forest Service will work with the PCT Association to monitor effectiveness and improve if needed. A stepover feature will also be constructed at trail junction on the Herman Creek Trail 406 to discourage bike access on portion entering Herman Creek Horse Camp.
3. On shared use sections of trail, trail layout and clearing will be used to maximize sight distances to the extent practical. Two segments of proposed trail (biker/hiker only) will be designated one-way (directional) to reduce safety concerns associated with user encounters.
4. Recreational use within the project area will be monitored and should user conflicts and/or public safety issues become a concern, mitigation strategies will be incorporated, including, but not limited to additional signage, additional directional designations of trail segments, use restrictions (e.g. type or timing of use), and outreach to user groups for community education related to best practices (e.g. speed recommendations, yield requirements, use of bike bells, animal leash and cleanup requirements).
5. The Forest Service will monitor recreational use and overflow parking along Wyeth and Frontage Roads and work with local and state agencies to address associated hazards (e.g. blocking of emergency vehicle access, pedestrian/biker travel on roadway). Actions to address these hazards could include increased signage, placement of vehicle barriers, and parking enforcement among others.

Cultural Resources

1. Contractors and employees working on the project will review a copy of the Columbia River Gorge National Scenic Area Inadvertent Discovery Plan. If cultural resources are discovered during implementation, all construction activities within 100 feet of the discovered resource shall cease. Cultural resources should remain as found; further disturbance is prohibited. Notify Chris Donnermeyer, Forest Service Archeologist, immediately.

Wilderness

1. The Forest Service will work with partners in the trails community to ensure that mountain bikers are aware of and respect wilderness boundaries. If new user-created trails are identified, they will be obliterated and rehabilitated to minimize potential impacts to wilderness character.

Lands

1. Prior to implementation, in areas where the trail is in close proximity to a NFS boundary, a survey will be conducted, the boundary clearly marked on the ground, and those involved with trail construction will be made aware of the boundary line.
2. The City of Cascade Locks holds a special use permit for a waterline serving the Oxbow Hatchery. A utility locate will be conducted to locate this waterline prior to trail construction.

3. The proposed trailhead site is adjacent to and partially underneath overhead power distribution and telephone lines operated by the City of Cascade Locks. No structures will be installed within 10' (on either side) of the powerline and power poles. Tall-growing vegetation will also not be planted within this area.
4. The Forest Service will provide a separate trail access adjacent to the BPA gate on Forest Service Road 8400022 at intersection with Wyeth Road. All gated trail access points will be designed to discourage illegal motorized access, minimize the development of user-created trails, and improve visitor safety.
5. The Forest Service will work with BPA to develop trailhead signage notifying recreation users that portions of the trail that overlay BPA access roads are actively used by motor vehicles for BPA maintenance activities. Warning signs will be posted at trail intersections with BPA's easement area, including transmission line corridor and access roads. Signage will be approved by BPA.
6. Trail layout and construction will ensure that no portion of the trail is within 50 feet of any BPA structure (e.g. steel lattice tower, steel pole, concrete pole, or concrete foundation) and that trail corridor avoids all equipment landings. No grade changes to facilitate construction or disposal of overburden shall be allowed within BPA's easement area. As needed, BPA right-of-way and access roads shall be returned to their original condition following trail construction.
7. Access to BPA structures shall remain open and unobstructed at all times during trail construction and maintenance.
8. Equipment, machinery, and vehicles traveling within BPA's easement area shall remain at least 25 feet away from any BPA structure or guy anchor ground attachment point. If there is a possibility that any equipment will encroach on this distance, then a safety watcher is required. There will be no storage of flammable materials or refueling of vehicles or equipment within BPA's easement area.
9. Forest Service will coordinate with BPA with respect to any vegetation to be planted within the easement area. Any vegetation exceeding agreed-upon height or obstruction limitations (typically 50 feet from towers) may be removed by BPA.

Appendix B: Consistency Determination

Consistent with the Columbia River Gorge National Scenic Area Management Plan, as adopted in 2004 and updated in 2016, a *project application was prepared and made available for public review and comment on March 2, 2021. This stand-alone appendix is the resulting consistency determination that concludes the Consistency Review Process.*

PROJECT DETAILS

PROJECT NAME AND TITLE	Cascade Locks Trail System, CD-21-01-S
APPLICANT	USDA Forest Service,
LOCATION	USFS Tax Lots: 2N08E0020, 2N08E00300, 2N08E0200700, 2N08e0700100, 2N08E0800400, 2N08E0400100,
COUNTY, STATE	Hood River County, OR
DATE	July 15, 2021

FINDINGS OF FACT

LANDOWNER:	USDA Forest Service, Columbia River Gorge National Scenic Area
APPLICANT:	USDA Forest Service, Columbia River Gorge National Scenic Area
PROPOSED ACTION:	Develop a 14.8-mile, shared use trail system on National Forest System (NFS) lands surrounding Cascade Locks, including a trail bridge, hardened fords, and a new trailhead
LOCATION:	Township Range Section: T.2N R7E, Sections 13, PB37, T.2N R.8E, Sections 2, 3, 4, 7, 8, 18, and T.3N R.8E Sections 33, 34, 45 Willamette Meridian Tax lot ID: USFS Tax Lots: 2N08E0020, 2N08E00300, 2N08E0200700, 2N08e0700100, 2N08E0800400, 2N08E0400100 UTM (if applicable):
NATIONAL SCENIC AREA DESIGNATION:	Special Management Area (SMA)
LAND USE DESIGNATION:	CRGNSA land use designations are SMA Open Space, Forest and Public Recreation and GMA (Urban Area). Recreation Intensity Classes 1, 2, 3, and 4.
LANDSCAPE SETTING	Landscape Settings: Gorge Walls, Canyonlands and Wildlands and Coniferous Woodlands.

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.**

A. PUBLIC COMMENT

A notice describing the project and making the application for consistency review publicly available for comment was sent to a mailing list of known interested parties and adjacent landowners on February 29, 2021. A period of 30 days was allowed for public comment. An Environmental Assessment (EA) was prepared and open for public comment March 3 through April 2, 2021. Seven comment letters were received during the comment period. Three comments were requesting additional information or clarification about the project. Two were general letters of support. Other comments and agency response are summarized below.

Comment: Two of the letters identified an error in the Draft EA maps that indicated a portion of Herman Creek Trail 406 would be closed to equestrian use.
Response: That error has been corrected in the Final EA.

Comment: Another comment referenced the need to obtain a Right-of-Way Road Approach Permit to vest the ingress and egress of the proposed parking lot onto Wyeth Road.
Response: A Right of Way Road Approach permit will be obtained prior to project implementation.

Comment: Two detailed comments were related specifically to equestrian access and requested the following changes: 1) improve loop trail opportunities for equestrians within the proposed system, 2) add a connector trail along Wyeth Road., 3) incorporate a step-over feature at trail junctions on Herman Creek Trail 406 as needed to discourage bicycle use on segments where not allowed; and 4) add emphasis on the need for signage to ensure visitor safety on shared use trail segments.
Response: Regarding the need to improve loop trail opportunities for equestrians, the purpose and need for the project is to provide additional, high-quality mountain biking opportunities to meet growing demand. The system would also provide 6.1 miles of new trail for equestrians with some short loop opportunities. Wyeth Road is a Hood River County road. Any trail construction proposed within the County right-of-way would require consultation with, and approval from, Hood River County. A stepover feature has been incorporated into the trail design to discourage bicycle use on portion of Herman Creek Trail 406 near Herman Creek Trailhead. Recreational use within the project area will be monitored and should user conflicts and/or public safety issues become a concern, mitigation strategies would be incorporated, including, but not limited to additional signage, additional directional designations of trail segments, use restrictions (e.g. type or timing of use), and outreach to user groups for community education related to best practices (e.g. speed recommendations, yield requirements, use of bike bells, animal leash and cleanup requirements).

Comment: After the comment period closed, the Forest Service also received feedback from Northwest Trail Alliance that the trail as currently designed would create two disconnected sections (west and east).

Response: The Forest Service will work with stakeholders in the coming years to identify potential connector routes between the western and eastern portions of the trail system.

Figure 1.Map of Project Area – West End

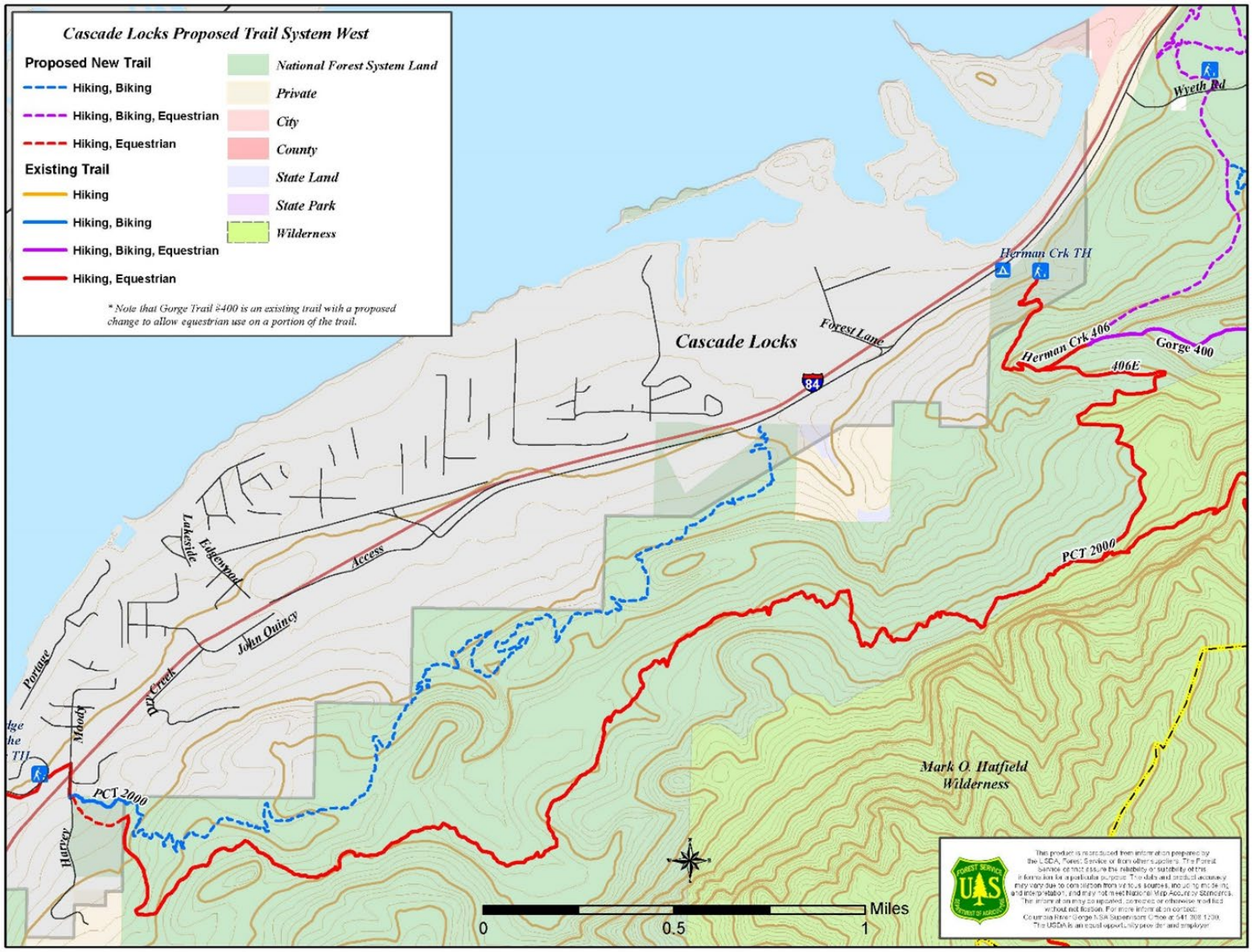


Figure 2. Map of Project Area – East End

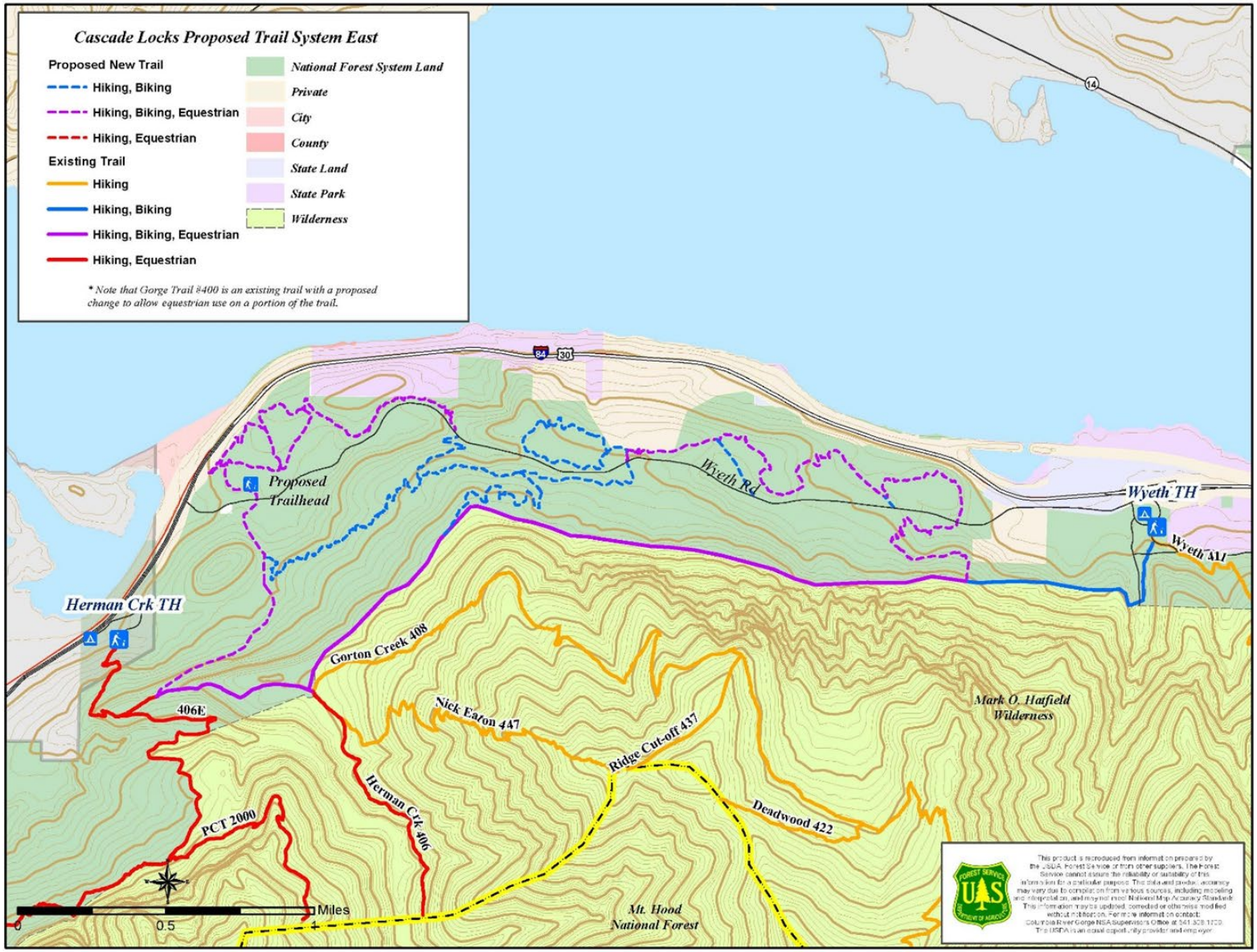


Figure 3. Trailhead Site Plan

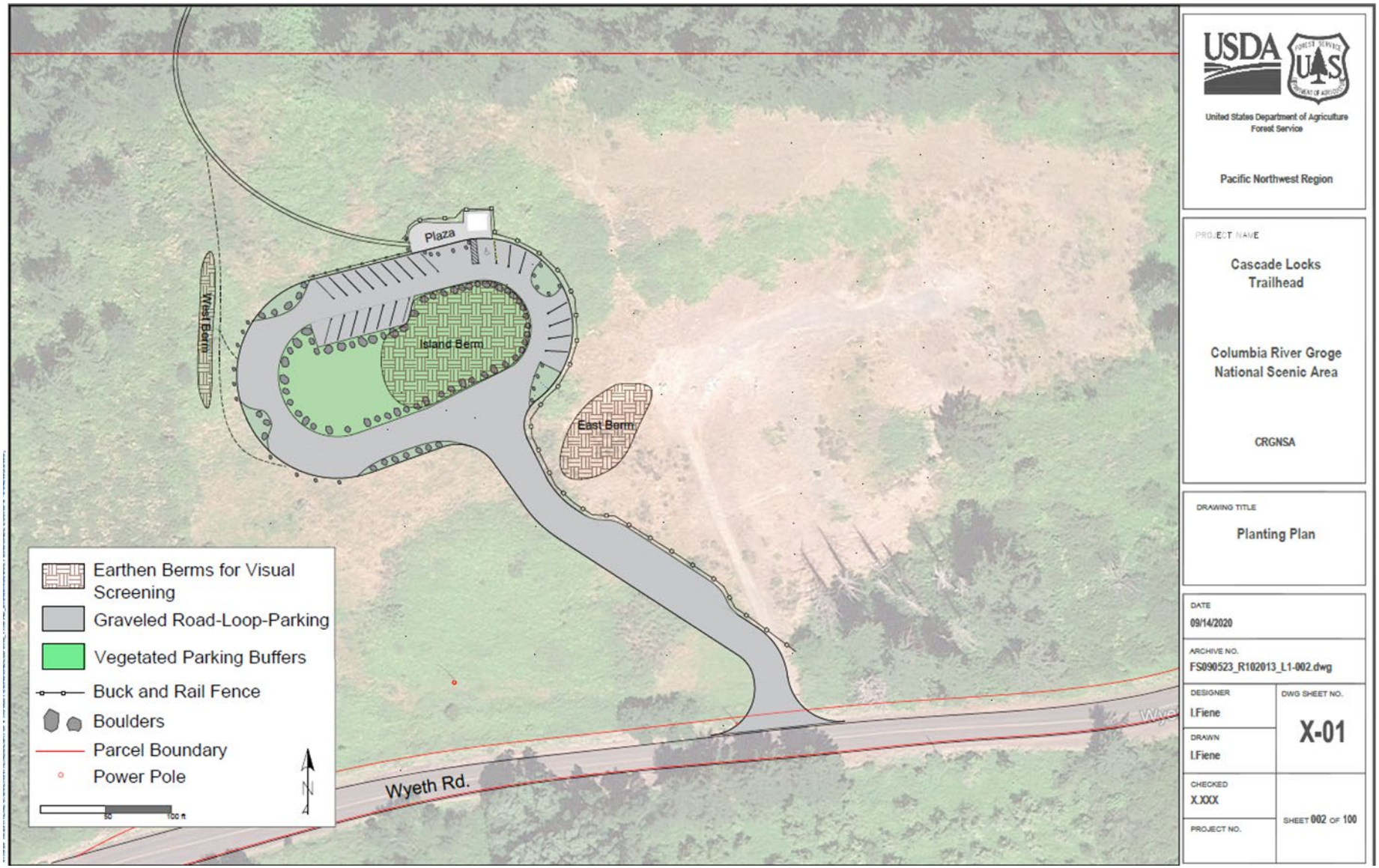
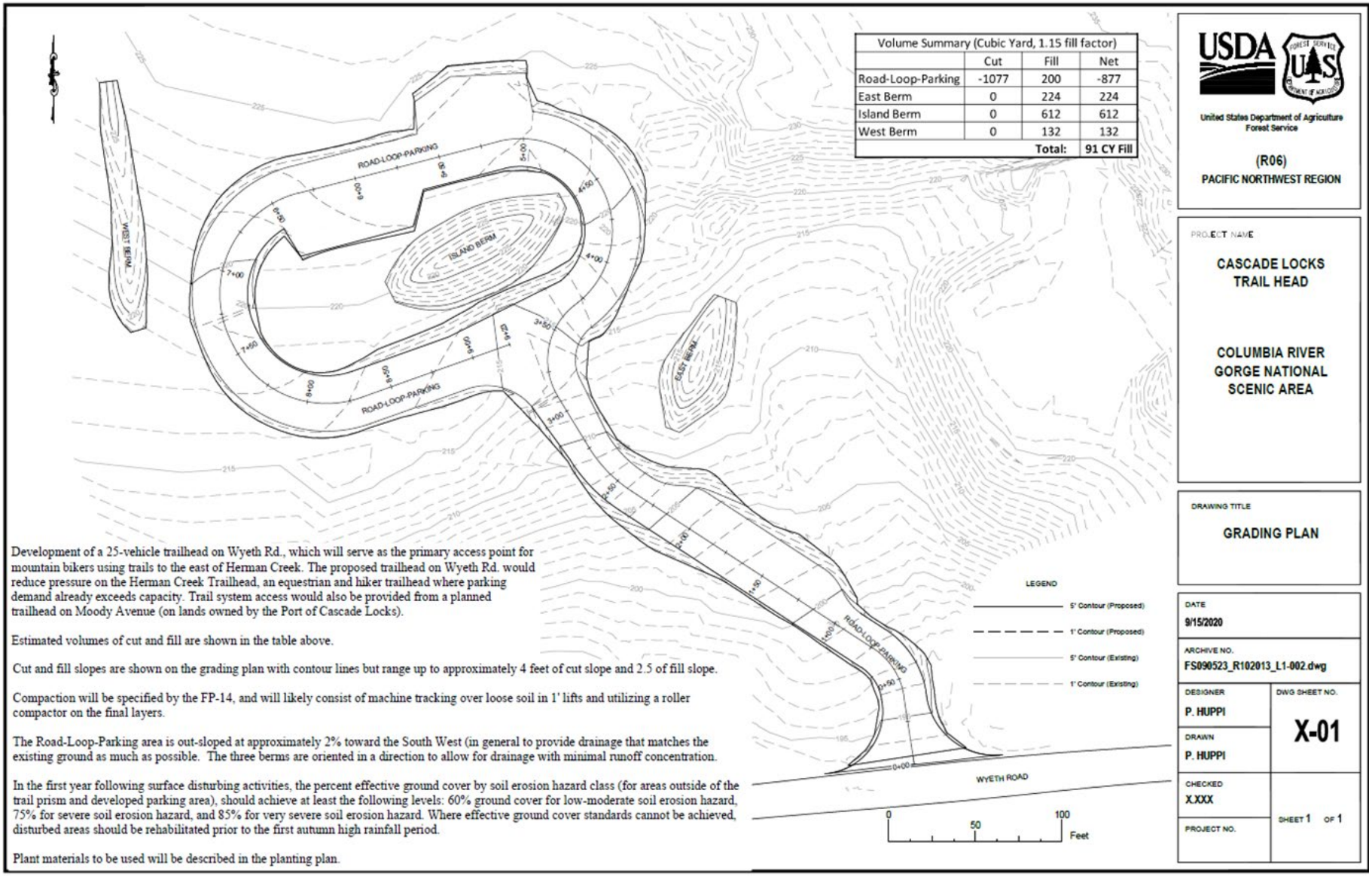


Figure 4. Trailhead Grading Plan



Development of a 25-vehicle trailhead on Wyeth Rd., which will serve as the primary access point for mountain bikers using trails to the east of Herman Creek. The proposed trailhead on Wyeth Rd. would reduce pressure on the Herman Creek Trailhead, an equestrian and hiker trailhead where parking demand already exceeds capacity. Trail system access would also be provided from a planned trailhead on Moody Avenue (on lands owned by the Port of Cascade Locks).

Estimated volumes of cut and fill are shown in the table above.

Cut and fill slopes are shown on the grading plan with contour lines but range up to approximately 4 feet of cut slope and 2.5 of fill slope.

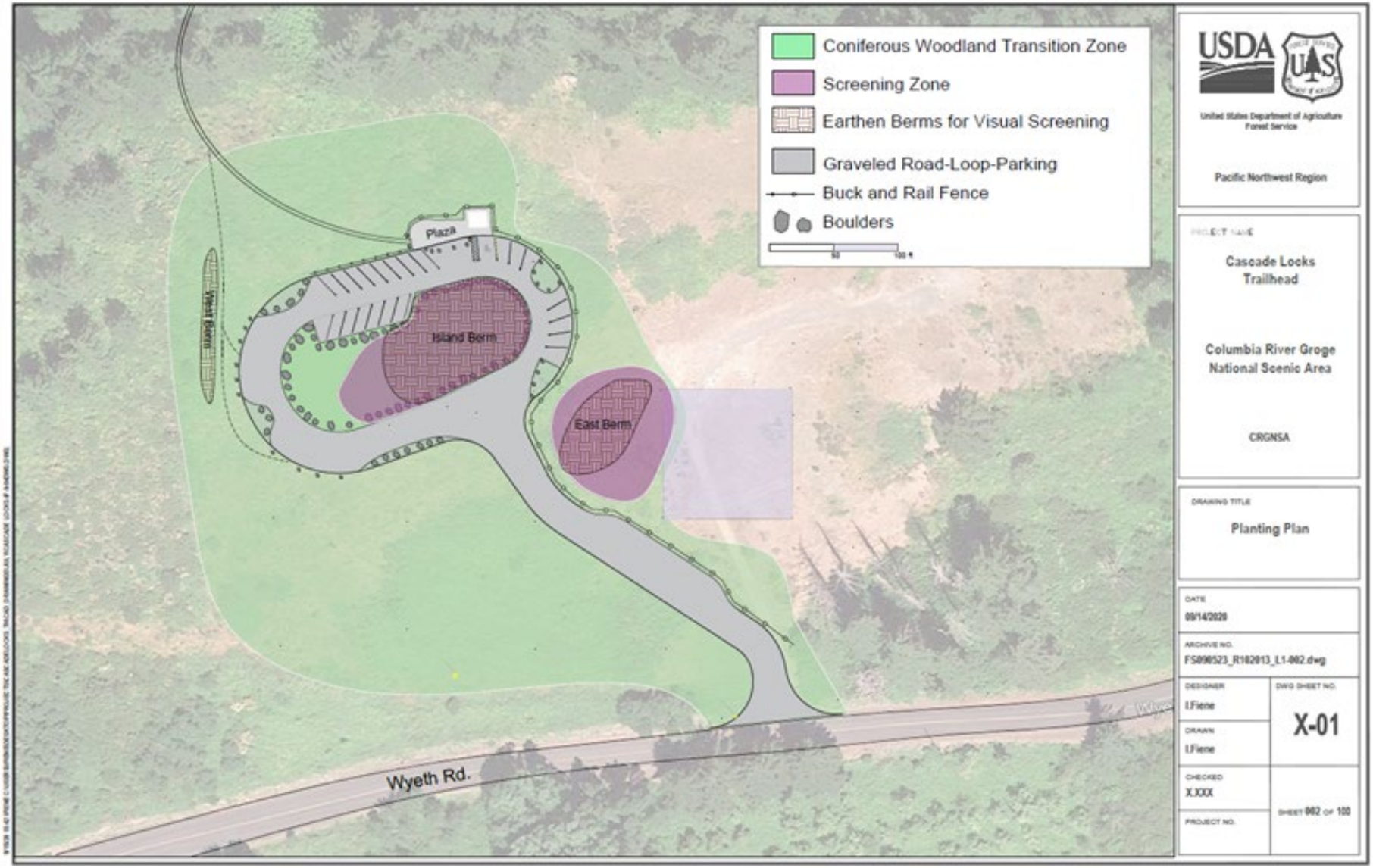
Compaction will be specified by the FP-14, and will likely consist of machine tracking over loose soil in 1' lifts and utilizing a roller compactor on the final layers.

The Road-Loop-Parking area is out-sloped at approximately 2% toward the South West (in general to provide drainage that matches the existing ground as much as possible. The three berms are oriented in a direction to allow for drainage with minimal runoff concentration.

In the first year following surface disturbing activities, the percent effective ground cover by soil erosion hazard class (for areas outside of the trail prism and developed parking area), should achieve at least the following levels: 60% ground cover for low-moderate soil erosion hazard, 75% for severe soil erosion hazard, and 85% for very severe soil erosion hazard. Where effective ground cover standards cannot be achieved, disturbed areas should be rehabilitated prior to the first autumn high rainfall period.

Plant materials to be used will be described in the planting plan.

Figure 5. Trailhead Planting Plan



B. PROJECT PROPOSAL

The Forest Service proposes to develop a 14.8-mile, shared use trail system on National Forest System (NFS) lands surrounding Cascade Locks and within the Columbia River Gorge National Scenic Area and Hood River County, Oregon. The Forest Service is also conducting an environmental review of the proposed project in compliance with the National Environmental Policy Act. Project documentation can be found on the USFS Columbia River Gorge National Scenic Area's project webpage at http://www.fs.usda.gov/project/?project=57214 and https://www.fs.usda.gov/projects/crgnsa/landmanagement/projects.

Mountain biking and hiking would be allowed on all new trails. Equestrian use would be allowed on six miles of the proposed new trail system in addition to a 2.7-mile portion of the Gorge Trail 400 that is currently only open for hiking and biking.

In an effort to minimize resource impacts from ground disturbance, the proposed trail system incorporates several previously disturbed corridors (e.g. old roadbeds and powerline corridor and access roads). Approximately 1.18 miles of the proposed system would overlay existing roadbeds (including Forest Service Roads 8400022, 8400024, 8400218, and 8400222). The proposed system would connect to the Pacific Crest Trail National Scenic Trail (PCT), Gorge 400 Trail, and Herman Creek Trail creating multiple, interconnecting mountain biking, hiking, and equestrian loop trail opportunities. A short section of the PCT (near the SW Moody Avenue trailhead in Cascade Locks) would be re-routed. See Figures 1-5.

Proposed trails would be designed and managed primarily for bicycle use, with some modifications in clearing height to accommodate equestrian use (Table 1). Location-specific design elements (e.g. 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.

Table 1. Proposed Design Standards for Cascade Locks Trail System

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
Design Clearing	Height	8' – 10'
	Width	48" - 72"
* Design standards do not apply to sections of trail that overlay BPA access roads.		

Generally, proposed trails would be singletrack (where users must travel in single file); vary from 12- to 36-inches wide; and be designed to wind around obstacles (e.g. trees, large rocks, and bushes) and blend into the surrounding environment. Whether mountain biking, hiking, or exploring on horseback, most visitors prefer a narrower trail corridor that facilitates the sense of being closely connected to nature. The narrow and frequently rough nature of singletrack also tends to slow mountain bikers down and help reduce visitor conflicts in areas where encounters with other user types are anticipated.

The proposal also includes development of a 25-vehicle trailhead on Wyeth Rd., which will serve as the primary access point for mountain bikers using trails to the east of Herman Creek. The proposed trailhead on Wyeth Rd. would reduce pressure on the Herman Creek Trailhead, an equestrian and hiker trailhead where parking demand already exceeds capacity. Trail system access would also be provided from a planned trailhead on Moody Avenue (on lands owned by the Port of Cascade Locks).

The proposed trail system would also require construction of a 50-foot, steel truss bridge (minimum 4-foot width) over Dry Creek in the western portion of the project area. The bridge would consist of concrete abutments, weathering steel, and untreated western cedar for the decking and railing. See Figure 6.

Figure 6 Example of bridge design over Dry Creek

C. Land Use Designations

Project area is primarily used for dispersed recreation (day use) and hiking on National Forest System trails. CRGNSA land use designations are SMA Open Space, Forest and Public

Recreation and GMA (Urban Area). Recreation Intensity Classes 1, 2, 3, and 4. Landscape Settings: Gorge Walls, Canyonlands and Wildlands and Coniferous Woodlands.

SMA *OPEN SPACE - 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.

Finding: This project is consistent with the *Columbia Tributaries West Watershed Analysis, Columbia River Gorge National Scenic Area (2001),* which serves as the Open Space plan for this area of the CRGNSA. The trail system as designed helps fulfill the recommendations provided in the *Analysis.*

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: This project is for low intensity recreation use (item C above) which is a Review Use for this designation. Additional details are provided in the findings below.

SMA FOREST and OPEN SPACE - *REVIEW USES*

1. The following uses may be allowed on lands designated Forest subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines. The use or development shall be sited to minimize the loss of land suitable for the production of forest products (other guidelines in this section are not applicable to this project):

   A. Low-intensity recreation, subject to the guidelines for recreation intensity classes (Part I, Chapter 4: Recreation Resources).

Finding: This project is consistent with the requirements and limitations appropriate to low intensity recreation use and developments. The application was open to public review in May-June 2021, reviewed by Forest Service specialists, subjected to the requirements of an EA prepared under the NEPA, and approval is subject to the adoption of project design criteria to minimize impacts on natural, cultural, scenic, and recreation resources.

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

Finding: This project is consistent with the provisions of Part I, Chapter 4 Recreation Resources as described in Section G of this document.

SMA PUBLIC RECREATION - *REVIEW USES*

1. The following uses may be allowed on lands designated Public Recreation subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines (other guidelines in this section are not applicable to this project):

   B. Public trails, consistent with the provisions in Part I, Chapter 4: Recreation Resources.

Finding: This project is consistent with the provisions of Part I, Chapter 4 Recreation Resources as described in Section G of this document.

D. 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):

   A. Pastoral: Pastoral areas shall retain the overall appearance of an agricultural landscape.

      (1) The use of plant species common to the landscape setting shall be encouraged. The use of plant species in rows, as commonly found in the landscape setting, is encouraged.

   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.

   C. Residential: The Residential setting is characterized by concentrations of dwellings.

      (1) At Rowena Dell, new buildings shall have a rustic appearance using natural materials. At Latourell Falls, new buildings shall have an appearance consistent with the predominant historical architectural style.

      (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.

   D. River Bottomlands: River Bottomlands shall retain the overall visual character of a floodplain and associated islands.

(1) Buildings shall have an overall horizontal appearance in areas with little tree cover.

(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.

E. Gorge Walls, Canyonlands, and Wildlands: New developments and land uses shall retain the overall visual character of the natural-appearing landscape.

(1) Structures, including signs, shall have a rustic appearance, use non-reflective materials, have low contrast with the surrounding landscape, and be of a Cascadian architectural style.

(2) Temporary roads shall be promptly closed and revegetated.

(3) New utilities shall be below ground surface, where feasible.

(4) Use of plant species non-native to the Columbia River Gorge shall not be allowed.

Finding:

The proposal is located within Coniferous Woodland LSET and Gorge Walls, Canyonlands, and Wildlands LSET. The CRGNSA Management Plan states that regardless of visibility from KVAs the project area shall retain the overall visual character of the natural appearance of these settings. Maintaining the appearance (form, line, color, texture, scale, proportion) of the distinctive and valued characteristics of the landscape settings would ensure the project's compatibility with the setting's natural character. For all lands within both identified LSETs, structures (including signs) shall be in compliance with the designated CRGNSA Graphic Signing System or have a rustic appearance, use non-reflective materials, have low contrast with the surrounding landscape, and be of a Cascadian architectural style. Revegetation and plantings shall be with native species to the Columbia River Gorge, and developments shall resemble natural features common to the landscape setting.

Elements of the proposal that could affect the naturally appearing characteristics of the LSETs include:

Trailhead Coniferous Woodlands

Trail System Coniferous Woodlands and Gorge Walls, Canyons, and Wildlands

Dry Creek Bridge Coniferous Woodlands

The overall project covers a wide area which includes mostly naturally appearing, undeveloped land located within the Coniferous Woodland Landscape Setting and the Gorge Walls, Canyonlands, and Wildlands Landscape Setting. Distinctive characteristics of these Landscape Settings (LSETs) present within the project are most pronounced in their associated vegetation and landform attributes. Existing landform complexity is moderate, growing more steep and complex as forested slopes transition to the steep basalt cliffs of the Gorge Walls, Canyons, and Wildlands Landscape Setting. Mixed elevation terrain with

gentle to steep slopes averaging 5 to 60%, and elevations from 500 to 1800 feet are common. Vegetation is generally dominated by large conifer tree species associated with the ecosystems of the wet western slopes of the Cascades. Such species include Douglas-fir, western hemlock, western red cedar, and grand fir. Deciduous and broadleaf species of trees frequent riparian corridors and many slopes in wetter areas. Where deviations to such distinct characteristics are present, damage to vegetation, soils, and landforms are most apparent.

Trailhead:

Project proposal includes development of a 25-vehicle trailhead on Wyeth Rd. in an existing gravel pit approximately 6.3 acres in size. Current conditions show the presence of heavily disturbed soil and landform due to recreational target practice, fire disturbance, and the presence of invasives. Disturbance has resulted in attributes associated with landform, land use, and vegetation being indistinct and no longer resembling that of the Coniferous Woodland LSET. The proposal includes weed treatment and revegetation with native species. Structures, including a toilet building, boulders, rustic fencing, and bike fix-it station have been specified appropriate colors/finishes/materials to blend with natural features common to the landscape setting. Proposed earthen berms have been sited and designed to match scale and proportion of landform in the surrounding area and LSET.

The guideline has been met because design criteria and vegetative treatments are compatible with the LSET. Vegetative treatments would help restore lost natural characteristics of the area and materials specified would be of dark, earth-toned colors found in the project area; resemble natural materials (stone, wood); and retain distinctive and/or common characteristics of the landscape setting.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- **Material selection for fence, stone, surfacing, picnic tables and all other amenities associated with site development would have final approval by CRGNSA scenic specialist.**
- **All concrete shall be a dark earth toned color found in the surrounding landscape and approved by CRGNSA scenic specialist.**
- **Forest Service Landscape Architect shall be on site during trailhead implementation to ensure the overall appearance of engineered earthen berms appear natural and blend with the surroundings. Surface shall appear roughened, uneven, and stones, slash, snags and vegetative material shall be used to achieve the desired effect.**

Trail System:

Proposed trails have been designed primarily for singletrack bicycle use (with some modifications to accommodate equestrian use) and designed to wind around obstacles such as trees, large rocks, and bushes. Limited tree removal is proposed (see Wildlife design criteria for specifications). With the inclusion of the project design criteria and the

following conditions, the trails would likely blend in with the surrounding setting and would not negatively impact valued characteristics of the LSET.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- **Low cut stumps to 8" or less, add dirt to cut face of stump, and retain downed wood in whole pieces (do not buck into smaller pieces)**

Dry Creek Bridge:

The trail would require construction of a 50-foot, steel truss bridge (minimum 4-foot width) over Dry Creek in the western portion of the project area, in the Coniferous Woodland LSET. Proposed bridge materials consist of concrete abutments, weathering steel, and untreated western cedar for the decking and railing. As proposed, the Dry Creek bridge would not be above surrounding tree canopy height and would be constructed of dark earth toned colors and non-reflective materials. With the inclusion of the following conditions, the Dry Creek Bridge would likely not negatively impact distinctive characteristics of the LSET.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- **All metal elements and hardware associated with bridge shall be a weathering steel or galvanized metal and treated with weathering agent such as natina.**

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.

Finding: The project area is topographically visible from the following Key Viewing Areas:

Table 2. Key viewing areas

KVA	Foreground	Middleground	Background
Columbia River		X	X
HCRH	X	X	X
I84		X	X
Wyeth Bench Road	X		
Pacific Crest Trail	X	X	

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.

Finding: Cumulative Effects are addressed at the end of the Scenic Resources section.

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

Table 3. 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, Oak-Pine Woodland	Forest, Agriculture, Residential, Public Recreation	Visually Subordinate
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 Not Visually Evident. 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.

NOTE: A small portion (0.35 miles out of 14.8 miles) of the trail falls within the less strict, Visually Subordinate Scenic Standard. The proposal will be analyzed using the strictest standard, Not Visually Evident.

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 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.

Finding:

The proposal is required to meet the scenic standard of Not Visually Evident to the surrounding landscape and as seen from KVAs.

Trail System:

The trail system has been designed to conform with natural features present in the landscape. Limited tree and vegetation removal have been specified in the Application. Due to existing vegetation consisting of large conifer tree species and design features ensuring it conforms and follows natural features present in the landscape it would likely not be evident to the casual viewer as seen from KVAs.

Trailhead:

The Applicant's Mitigation plan states the trailhead will be carefully sited and designed to ensure the Not Visually Evident standard as seen from Key Viewing Areas (KVA) is maintained. Where the use of natural topography is not feasible, constrained use of earthen berms (designed to fit with scale and proportion of landform common to the landscape setting), in combination with medium to tall structured native trees and vegetation, will be used to achieve the standard of Not Visually Evident. Except as is necessary for construction of parking area, access road, and toilet building, existing tree cover screening the proposed trailhead from key viewing areas and scenic routes shall be retained.

Dry Creek Bridge:

Field review and visibility analysis show the bridge to not be visible from KVAs as proposed. To maintain the scenic standard to the surrounding landscape, the bridge would consist of weathering steel and untreated western cedar.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- ***All metal elements and hardware associated with bridge shall be a weathering steel or galvanized metal and treated with weathering agent such as natina.***
- ***All concrete shall be a dark earth toned color found in the surrounding landscape and approved by CRGNSA scenic specialist.***

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.

Finding:

The landscape is topographically visible from Key Viewing Areas (see Guideline 1).

Visibility

Trail System:

Proposed trail system is topographically visible within the foreground, middleground and background from various KVAs. Because of existing vegetation, design features and suggested conditions of approval, it would likely not be noticeable to the casual viewer as seen from KVAs (Columbia River, Historic Columbia River Highway, I84, Wyeth Bench Rd, and the Pacific Crest Trail) once ground disturbance has been revegetated and stumps have aged.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- ***Trail System: Consult with USFS Scenic Specialist regarding all trees 11" DBH and greater proposed for removal prior to construction. USFS Scenic Specialists to ensure trees proposed for removal would not result in trail being Visually Evident from KVAs.***

Trailhead:

The proposed trailhead and its associated structures are in the immediate foreground (less than ¼ mile) of the Scenic Route and KVA Wyeth Bench Road, and therefore should receive the greatest attention regarding visibility and compatibility with LSETs. Views from other KVAs to the trailhead have potential to be topographically visible in the middleground (1/2 mile to 3 miles) and background (from middleground and beyond).

USFS design team carefully considered the location and placement of the trailhead and its components in relation to its foreground visibility from Wyeth Bench Road and its middleground and background visibility from multiple other KVAs. All locations on the site feasible for development and placement of structures associated were analyzed on site and in Google Earth and had some level of visibility to Wyeth Bench Road. Special consideration was given to levels of disturbance, engineering, grading, accessibility, and circulation. Where use of natural topography was not feasible to screen views, the careful and restrained use of planted earthen berms, screening vegetation and other design criteria to mimic the natural form, line, color, texture, scale and proportion of surrounding landscape was used to ensure visibility would be minimized.

Foreground visibility from Wyeth Bench Road has been mitigated through careful selection and use of design features such as the mimicking of natural form, color and texture through the choice of materials (native sourced stone, wooden fencing, and dark earth toned colors for the toilet building). Changes in the qualities of size, amount,

intensity, direction, pattern, of the built environment in this area will be noticeable to a casual observer in the immediate foreground during construction and until planted berms, weed treatments, and other screening vegetation is established. With such design measures and the suggested conditions of approval, the project would likely meet the requirement for visibility from KVAs.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- ***Trailhead: Except as is necessary for construction of parking area, access road, and toilet building, existing tree cover screening the development from key viewing areas and scenic routes shall be retained.***
- ***Trailhead: All areas disturbed during development shall be revegetated immediately upon completing the project (or as soon as possible thereafter if the project is completed during the winter months) with at least 80 percent vegetative coverage within 1 year.***
- ***All proposed signage for facility identification and wayfinding shall conform with the designated Graphic Signing System of the CRGNSA***

Dry Creek Bridge:

Google Earth imagery and site visits have shown the Dry Creek Bridge to not be visible from KVAs.

Cumulative Effects

Once screening vegetation has had time to establish, and specified design criteria and suggested conditions of approval implemented, it is not anticipated this project would have discernable effects to the scenic resource. If no discernable effects, then there would be no adverse cumulative effects on the Scenic resource as a result 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.

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

Finding: Constructed elements would not protrude above 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: Structure heights would remain well below local tree and vegetation height. Guideline met.

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: Applicable. The applicant has specified new earthen berms and screening vegetation to aid in achieving the scenic standard of Not Visually Evident from KVAs. Applicant will work with local USFS Scenic specialists and Botanist to ensure required vegetation survives and provides sufficient screening within 5 years. If vegetation does not survive it must be replanted to ensure the scenic standard is met.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- ***Landscaping to be installed to achieve the scenic standard must be established within 5 years. If Consultation with USFS Scenic Specialist results in the determination the standard has not been met after 5 years, measures shall be taken to ensure the Standard is met, such as installing new plantings with the use of irrigation and weed removal on a regular basis.***

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: Guideline met (see above).

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.

Finding: Applicable. Applicant will consult with USFS scenic specialists on materials.

To ensure consistency with guidelines, the following conditions of approval are recommended:

- ***Consult with USFS Scenic Specialist on final color and finishing elements for all structures and constructed elements to ensure low-reflectivity and color requirements are met.***

13. Any exterior lighting shall be sited, limited in intensity, shielded, or hooded in a manner that prevents lights from being highly visible from key viewing areas and from noticeably contrasting with the surrounding landscape setting, except for road lighting necessary for safety purposes.

Finding: Not applicable. No lighting is proposed.

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

Finding: Not applicable. No lighting is proposed.

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.

Finding: The trailhead is in the immediate foreground of Scenic Route and KVA Wyeth Bench Road. Wyeth Bench Road does not have guidelines to conform to outside the CRGNSA Management Plan.

[2 and 3 – Not Applicable]

4. The following guidelines shall apply only to development within the immediate foregrounds of key viewing areas. Immediate foregrounds are defined as within the developed prism of a road or trail KVA or within the boundary of the developed area of KVAs such as Crown Pt. and Multnomah Falls. They shall apply in addition to applicable guidelines in the previous section (SMA Guidelines for Development Visible from KVAs).

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

Finding: Guideline met. See *SMA GUIDELINES FOR DEVELOPMENT AND USES VISIBLE FROM KVAS*, Visibility section.

B. Findings must evaluate the following:

(1) The limiting factors to meeting the required scenic standard and/or applicable guidelines from the previous section;

(2) Reduction in project size;

(3) Options for alternative sites for all or part of the project, considering parcel configuration and on-site topographic or vegetative screening;

(4) Options for design changes including changing the design shape, configuration, color, height, or texture in order to meet the scenic standard.

Finding: The proposed trailhead, which is visible in the immediate foreground from Wyeth Bench Road, was carefully analyzed in relation to its visibility and reducing the potential impacts to scenic resources. Alternate locations within proximity to the trail system were considered. These locations proved not feasible due to circulation issues, and resource concerns. Ultimately the proposed trailhead location was reduced in size, materials changed to reflect more rustic and natural features, and mitigations in the form of berms and screening plantings were added to ensure maximum compliance with the scenic standard.

C. Form, line, color, texture, and design of a proposed development shall be evaluated to ensure that the development blends with its setting as seen from the foreground of key viewing areas:

(1) Form and Line-Design of the development shall minimize changes to the form of the natural landscape. Development shall borrow form and line from the landscape setting and blend with the form and line of the landscape setting. Design of the development shall avoid contrasting form and line that unnecessarily call attention to the development.

(2) Color shall be found in the project's surrounding landscape setting. Colors shall be chosen and repeated as needed to provide unity to the whole design.

(3) Texture borrowed from the landscape setting shall be emphasized in the design of structures. Landscape textures are generally rough, irregular, and complex rather than smooth, regular, and uniform.

(4) Design solutions shall be compatible with the natural scenic quality of the Gorge. Building materials shall be natural or natural appearing. Building materials such as concrete, steel, aluminum, or plastic shall use form, line color and texture to harmonize with the natural environment. Design shall balance all design elements into a harmonious whole, using repetition of elements and blending of elements as necessary. 5. Right-of-way vegetation shall be managed to minimize visual impacts of clearing and other vegetation removal as seen from key viewing areas. Roadside vegetation management (vista clearing, planting, etc.) should enhance views from the highway.

Finding: Guideline met. See SMA GUIDELINES FOR DEVELOPMENT AND USES VISIBLE FROM KVAS, Visibility section.

6. Screening from key viewing areas shall be encouraged for existing and required for new road maintenance, warehouse, and stockpile areas.

Finding: Guideline met. See SMA GUIDELINES FOR DEVELOPMENT AND USES VISIBLE FROM KVAS, Visibility section.

SMA GUIDELINES FOR AREAS NOT SEEN FROM KVAS

1. Unless expressly exempted by other provisions in this chapter, colors of structures on sites not visible from key viewing areas shall be earth-tones found at the specific site. The specific colors or list of acceptable colors shall be approved as a condition of approval, drawing from the recommended palette of colors included in the Scenic Resources Implementation Handbook.

Finding: Guideline met. See SMA GUIDELINES FOR DEVELOPMENT AND USES VISIBLE FROM KVAS, Visibility section.

E. CULTURAL RESOURCES

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

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].

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/or 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.

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: Cultural resource survey was originally conducted in 2015 by PBS Engineering and Environmental, Inc (PBS). The pedestrian field survey of the APE resulted in the documentation of one modern site, three historic archaeological resources within the direct APE, one precontact archaeological resource, and one historic-period Port reservoir structure adjacent to the APE for the proposed Project. PBS recommended relocating the proposed trail at two locations to avoid two of the archaeological resources identified (Thomas 2015). In a letter dated October 2, 2015, Marge Dryden, CRGNSA Heritage Program Manager, concurred with the recommendations made by PBS, with an assessment of effect of "no effect".

In 2019, additional cultural resource work was conducted by CRGNSA Heritage Program Manager Chris Donnermeyer at four trail relocations, including the two recommended by PBS. An addendum cultural resource survey report was produced, and additional consultation conducted. The addendum 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 and to ensure consistency with the CRGNSA Management Plan. In the addendum report, a recommended assessment of effect of "*Historic properties affected*" (36 CFR 800.4 (d)(2)), "*No adverse effect*" (36 CFR 800.5(b)) was made for the proposed undertaking. The consulting parties included the Oregon State Historic Preservation Office (OR SHPO), Confederated Tribes and Bands of the Yakama Nation, Confederated Tribes of Warm Springs (CTWS), Confederated Tribes of the Umatilla Indian Reservation (CTUIR), Nez Perce Tribe, and the Confederated Tribes of Grand Ronde (CTGR). All consulting parties were sent the final cultural resource survey report addendum on February 26, 2020. Both OR SHPO and the CTWS concurred with the recommended assessment of effect. No other responses were received.

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 State Historic Preservation Office. The applicant should also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.

F. NATURAL RESOURCES

The Management Plan, Part I, Chapter 3 (Natural Resources), SMA Provisions, states:

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.).

WATER RESOURCES

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.

(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 of 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 sensitive wildlife/plant or water resource, (2) describes the biology of the sensitive 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 sensitive 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: This guideline applies since the Cascade Locks Trail System includes both existing and new trails that enter stream buffers in the vicinity of where it crosses streams. The trail system crosses seven stream or seeps as identified by field surveys during the 2019 field season, five of which are located on existing trails (the Gorge 400) or an existing road bed (FSR 8400024), one new trail crossing over Dry Creek and one new trail crossing for the Pacific Crest Trail re-route over Rudolph Creek. These five crossings do not flow continuously downstream into a fish-bearing stream channel or river. The sixth crossing is proposed to be a bridge over Dry Creek, an intermittent fish-bearing stream. The seventh crossing over Rudolph Creek, an intermittent, non-fish bearing stream. A mitigation plan

is required and was provided that mitigates the water resources impacts from the disturbance resulting from trail construction and use.

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: The proposal meets this guideline because, as stated in the Mitigation Plan, "restoration and revegetation needed as a result of trailhead development and trail construction would be implemented in coordination with the botanist as needed. Planting and restoration plan will utilize locally sourced native plant species."

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

Finding: The proposal meets this guideline since Water Resource types were identified as part of the planning process, along with associated buffers. See 2.A. finding above.

D. Wetlands Boundaries shall be delineated using the following:

(1) The approximate location and extent of wetlands in the Scenic Area is shown on the National Wetlands Inventory (U.S. Department of the Interior, 1987). 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. Wetlands boundaries shall be delineated using the procedures specified in the '1987 Corps of Engineers Wetland Delineation Manual (on-line edition)'.

(4) All wetlands delineations shall be conducted by a professional who has been trained to use the federal delineation procedures, such as a soil scientist, botanist, or wetlands ecologist.

Finding: The proposal meets this guideline because the new trail segments proposed do not cross any wetlands, other than a seep on an existing road, which will receive a low-water crossing rock structure to protect and maintain the tread and prevent erosion and impact to the riparian resource.

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: The proposal meets this guideline because a Forest Service hydrologist will identify bank full flow boundaries and assist with stream crossing planning, design, and implementation at stream crossing locations for new sections of the trail system.

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.

Finding: The proposal meets this guideline because, as stated above, a Forest Service hydrologist will identify bank full flow boundaries and assist with stream crossing planning, design, and implementation at stream crossing locations for new sections of the trail system.

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.

(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 mitigation plan.

Finding: The proposal meets this guideline by providing a no practicable alternatives test. The proposal includes trail development and bridge construction within the aquatic buffer and therefore a practicable alternative test is required to determine whether the activities and development can be moved to an alternative site outside of the buffer. There is no practicable alternative location for the proposed trail and bridge that would allow the project to meet its objectives. Water crossings have been minimized to the extent possible. The bridge crossing Dry Creek will be designed to minimize effects on water resources with sufficient length and freeboard to avoid constricting the natural, active flow channel and

minimize constriction of the overflow channel. Bridge approaches will be hardened and designed to minimize erosion. The bridge will be constructed during dry season or during the in-water work period to further minimize effects to water and fishery resources.

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)

Finding: The proposal meets this guideline. Minimal short-term and no measurable long-term effects to water quality and no measurable effects to water quantity are expected from the implementation of the Cascade Locks Trail System proposed action, so no cumulative effects to water quality and quantity are therefore anticipated.

WILDLIFE AND PLANTS

1. 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.

Finding: Because this project is occurring on National Forest System lands, a Biological Evaluation and Biological Assessment were completed.

There are 4 sensitive plant species that occur within 1000 feet of the proposed use.

- **Longbearded hawkweed (*Hieracium longiberbe*)**
- **Howell's daisy (*Erigeron howellii*)**
- **Cabbage lungwort (*Lobaria linita*)**
- **Duplicate tube lichen (*Hypogymnia duplicate)***

The following wildlife sites/areas are within 1000 ft. of the proposed activities.

- **Larch Mountain Salamander**
- **Priority Riparian Habitat**
- **Priority Old Growth Forest**
- **Priority Talus Habitat**

Within 1000 ft of the project, the project was not likely to adversely affect:

- **Northern spotted owl**

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).

Finding: Forest Service resource specialists were involved in development of proposed activities and reviewed resources within 1000 feet of the project. The project and site plans have been submitted and discussed with U.S. Fish and Wildlife Service (for northern spotted owl). National Marine Fisheries Service had an incidental field visit (for anadromous salmonids and steelhead and their critical habitats), and Oregon Department of Fish and Wildlife were also informed of the project.

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.

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

(c) The local government shall submit all requests to re-configure sensitive 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: Forest Service resource specialists were involved in development of proposed activities and reviewed resources within 1000 feet of the project.

The following criteria were developed to protect sensitive plants:

1. **Trailhead development and trail construction and maintenance activities will limit unnecessary disturbance to intact native vegetation and habitats to the fullest extent possible.**
2. **The trail will be routed to avoid disturbance of dry cliff and rock-face habitat suitable for Howell's daisy (*Erigeron howellii*) and long-bearded hawkweed (*Hieracium longiberbe*).**
3. **If any new species or populations of sensitive plants are found during project implementation, these species would be considered as described in the policy guidelines found in FSM 2670 and the botanist shall be notified and appropriate measures taken to ensure avoidance and protections and determine next steps.**
4. **In order to protect *Lobaria linita* and *Hypogymnia duplicata* species and habitat, removal of any trees greater than 11" diameter at breast height will require prior consultation with the Forest Service botanist. No host trees would be removed; known locations would be buffered; and forest microclimate in immediate area would be maintained. A botanist trained in identification of these species would determine the appropriate site-specific buffer distance and final trail location.**
5. **Restoration and revegetation needed as a result of trailhead development and trail construction would be implemented in coordination with the botanist as needed. The planting and restoration plan will utilize only locally sourced native plant species.**
6. **Treatment of invasive *Ilex* should be conducted in the understory, to prevent further spread and alteration of forested habitat. This design criteria serves as a mitigation to potential encroachment of sensitive plant buffers.**

The project and site plans have been submitted and discussed with U.S. Fish and Wildlife Service (for northern spotted owl). National Marine Fisheries Service had an incidental field visit (for anadromous salmonids and steelhead and their critical habitats), and Oregon Department of Fish and Wildlife were also informed of the project. Through these consolations, the following conditions of approval were developed:

1. **To protect possible use of the site by northern spotted owls, chainsaw or heavy equipment work will not occur between March 1 – July 15, aside from construction**

of the non-habitat Wyeth trail-head parking lot (as per consultation with USFWS, and stated in BE).

2. **As per the Biological Assessment of NLAA Projects with the Potential to Modify the Habitat of Spotted owls – Willamette Province, FY2014, reference # 01EOFW00-2014-F-0221), the following trail construction prescription will ensure a finding of not likely to adversely affect the northern spotted owl;**
3. **During trail construction/enhancement for existing trails the follow prescription for tree cutting must be occur:**
    a. **Do not remove any trees 30 or greater inches dbh, unless classified as a hazard/danger tree. Trees will be left on site to contribute to coarse woody debris.**
    b. **Trees ≥ 18 inches but < 30 inches dbh can be removed on a limited basis (no more than one tree per 1,000 feet) within the project area trail width, which is limited to the actual 2 to 3 foot wide trail footprint and the 2 foot wide brushed area on either side of the trail (an average trail width plus brushing width totaling 6-7 feet). Trees will be left on site to contribute to coarse woody debris.**
    c. **Trees > 11 inches but < 18 inches dbh can be removed on a limited basis (averaging no more than one tree per 150 feet) within the project area trail width, which is limited to the actual 2 to 3 foot wide trail footprint and the 2 foot wide brushed area on either side of the trail.**
    d. **Trees ≤ 11 inches can be removed with no limits within the trail foot print width of 2-3 feet.**
    e. **Trees ≤ 8 inches can be removed with no limit within the 2 foot wide brushed area on either side of the trail.**
4. **At Dry Creek, do all work on trail approaches to the non-motorized bridge and bridge installation itself when Dry Creek is dry, and the weather is in the dry season. Direct all created sediment away from entering the creek (even after anticipating first heavy rains).**
5. **Use appropriate BMPS in the few proposed and current trail wet areas (4 areas besides Dry Creek), to minimize delivery of sediment even though those 4 areas do not connect to anadromous Columbia River tributaries. All areas should be rocked to minimize any possible sediment delivery.**
6. **Since Oregon salamanders were found in boulder fields, the proposed trail prism, where possible, should be adjusted slightly away from boulder fields.**
7. **Refuel and service equipment outside the riparian area to reduce the chance of spilling toxic fuels and lubricants;**
8. **Clean equipment of all dirt and weeds before entering the project area to prevent the spread of invasive plants;**

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.

Table 4. Priority habitats

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.

Finding: This project has been designed to maintain both older forest, riparian and talus Priority Habitats. As long as the project is carried out as designed and with the recommended conditions of approval (above), project activities should not compromise the integrity and function of or result in adverse effects to affected wildlife or plant areas or sites.

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.

Finding: Consistent. The proposal meets this guideline because all wildlife and botanical sites have been identified and appropriate measures to avoid, and/or mitigate have been identified and included as recommended conditions of approval. The protection process can be terminated at this point.

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: Consistent. A Practicable Alternative Test and Mitigation Plan have been prepared and provided in the section below.

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.

Finding: Consistent. All consultations and surveys have been completed and are on file with the Forest Service.

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.

Finding: The design of the trail system and the mitigation plan serve to protect sensitive wildlife/plant sites within the project area.

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)

Finding: See section A. above.

Cumulative Actions and Effects:

Affected Resource: **The affected resource is northern spotted owl, Riparian Priority Habitat, Snag and Log Priority Habitat.**

Spatial Boundary: **The spatial boundary is the 6th Field HUCs Carson Creek-Columbia River (#170701051204) and Herman Creek (#170701051201).**

Temporal Boundary: **The temporal boundary is 20 years into the future – a minimum approximation of the value of this project.**

Past Actions: **The cumulative effects analysis includes an analysis of past actions by including them in the assessment of current conditions. Current conditions within the Columbia River Gorge have been impacted by innumerable actions over the last century (and beyond) and trying to isolate the individual actions that continue to have residual impacts would be nearly impossible. Providing the details of past actions on an individual basis would not be useful to predict the cumulative effects of the proposed action or alternatives. Focusing on individual actions would be less accurate than looking at existing conditions, because there is limited information on the environmental impacts of individual past actions, and one cannot reasonably identify each and every action over the last century that has contributed to current conditions. Additionally, focusing on the impacts of past human actions risks ignoring the important residual effects of past natural events, which may contribute to cumulative effects just as much as human actions. The current conditions serve as an aggregate of all past actions, so by looking at current conditions, we are sure to capture all the residual effects of past human actions and natural events, regardless of which particular action or event contributed those effects.**

Present Actions: **There are no known similar projects occurring in the watershed at this time.**

Reasonably Foreseeable Future Actions: **There are no known similar projects occurring in the watershed in the reasonably foreseeable future.**

Cumulative Impacts: **There are no cumulative effects from this project.**

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 meets this guideline. Prior to construction of the proposed trailhead on Wyeth Road and the trail bridge at Dry Creek crossing, contractors will develop sediment and erosion control plans that will be provided to the Forest Service hydrologist for approval. Sediment and stormwater controls will be installed prior to initiating surface-disturbing activities near sensitive areas. Trails will be located, designed, and constructed to conform to the terrain, minimize erosion, provide suitable drainage, and provide adequate pollutant filtering between the trail and any nearby waterbodies. New and existing trails with moderate or high erosion potential should be monitored, maintained, and/or reconstructed to include necessary stabilization and drainage features that minimize trail tread erosion. The disturbed soil area does not exceed 15 percent of the project area. Additionally, the mitigation plan includes the mitigation that "in the first year following surface disturbing activities, the percent effective ground cover by soil erosion hazard class (for areas outside of the trail prism and developed parking area), should achieve at least the following levels: 60% ground cover for low-moderate soil erosion hazard, 75% for severe soil erosion hazard, and 85% for very severe soil erosion hazard. Where effective ground cover standards cannot be achieved, disturbed areas should be rehabilitated prior to the first autumn high rainfall period. Maintain at least 95% ground cover (e.g. vegetation, duff, or litter) within riparian areas. Avoid ground disturbing activities in saturated soil areas where practicable."

PRACTICABLE ALTERNATIVE TEST

The proposal includes trail development and bridge construction within the aquatic buffer and therefore a practicable alternative test is required to determine whether the activities and development can be moved to an alternative site outside of the buffer.

Several options were considered for placement of the trail. Final trail layout (including location of Dry Creek crossing) reflected the need to 1) provide a variety of trail experiences including routes of varying length and challenge levels; 2) ensure the trail would be located completely on National Forest System lands; and 3) allow for gentle, cross-slope trail grades as needed to minimize erosion. There is no practicable alternative location for the proposed trail and bridge that would allow the project the meet these objectives.

Water crossings have been minimized to the extent possible. The bridge crossing Dry Creek will be designed to minimize effects on water resources with sufficient length and freeboard to avoid constricting the natural, active flow channel and minimize constriction of the overflow channel. Bridge approaches will be hardened and designed to minimize erosion. The bridge will be constructed during dry season or during the in-water work period to further minimize effects to water and fishery resources.

Finding: A Practicable Alternative test was required and has been completed.

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).

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

Finding: A Mitigation Plan was required because the proposed development is within a buffer zone.

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.

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.

5. A project applicant shall demonstrate sufficient fiscal, technical, and administrative competence to successfully execute a mitigation plan involving wetland creation.

Finding: **A Mitigation Plan is provided below. Design elements have been incorporated to ensure that the proposed use results in minimum practicable occurrences and reduces impacts to water quality, natural drainage, and fish and wildlife habitat.**

Construction and maintenance activities requiring the use of chainsaws, heavy equipment, or helicopter support will only occur between July 16 and February 28, with the exception of trailhead development on Wyeth Rd. Construction of the bridge at Dry Creek crossing will occur during dry weather and an erosion control plan will be implemented to ensure sediment is not delivered into Dry Creek during construction. No in-water work is included within the proposal.

Development activities would limit disturbance to intact native vegetation and habitats to the fullest extent possible. In order to protect *Lobaria linita* and *Hypogymnia duplicata* species and habitat, no host trees will be removed; known locations will be buffered; and forest microclimate in immediate area would be maintained. A botanist trained in identification of these species will determine the appropriate site-specific buffer distance and final trail location. Trail construction contract specifications will require contractor to consult with the Forest Service botanist prior to removing any trees greater than 11" DBH.

Restoration and revegetation needed as a result of trailhead development and trail construction would be implemented in coordination with the botanist as needed. Planting and restoration plan will utilize locally sourced native plant species.

The following protection measures for scenic, cultural natural, and recreation resources will be included in project implementation. These measures are designed to avoid adverse effects during implementation and also to enhance resource conditions post-implementation. All mitigation measures and design criteria included in the environmental analysis will apply to proposed project.

Aquatic Resources

Stream crossings will be oriented perpendicular to the channel; located where channels are narrow, straight, and characterized by stable soils; and designed to minimize restriction of flood flows and maintain floodplain connectivity. Low-water crossings will be designed to maintain the function and bedload movement of the natural stream channel and to minimize flow constriction, site disturbance, and channel blockage to the extent practicable. Unimproved fords will be located in stable reaches with a firm rock or gravel base that has sufficient load-bearing strength for allowed uses. Low-water crossings and ford approaches will be hardened, designed to minimize erosion, and constructed during dry season or during the in-water work period. Forest Service hydrologist will work with contractors, trail crew, and partners to design sections of trail (existing and proposed) in sensitive areas, including stream crossings and seeps.

Bridge design for Dry Creek crossing will be of adequate length and with sufficient freeboard to avoid constricting the natural, active flow channel and minimize constriction of the overflow Dry Creek channel. Bridge approaches will be hardened and designed to minimize erosion. Bridge will be constructed during dry season or during the in-water work period.

The Forest Service will monitor trail conditions to identify drainage and trail surface maintenance needs and avoid, minimize, or mitigate adverse effects to soil, water quality, and riparian resources. As needed, additional drainage features, stabilization structures, and tread hardening will be used to address erosion issues. Forest Service will close and rehabilitate unauthorized trails that result in adverse effects to soil, water quality, and riparian resources.

In the first year following surface disturbing activities, the percent effective ground cover by soil erosion hazard class (for areas outside of the trail prism and developed parking area), should achieve at least the following levels: 60% ground cover for low-moderate soil erosion hazard, 75% for severe soil erosion hazard, and 85% for very severe soil erosion hazard. Where effective ground cover standards cannot be achieved, disturbed areas should be rehabilitated prior to the first autumn high rainfall period.

Maintain at least 95% ground cover (e.g. vegetation, duff, or litter) within riparian areas. Avoid ground disturbing activities in saturated soil areas where practicable.

Scenic Resources

Trailhead will be carefully sited and designed so as to ensure the not visually evident standard as seen from Key Viewing Areas (KVA) is maintained. Where the use of natural topography is not feasible, constrained use of earthen berms (designed to fit with scale and proportion of landforms common to the landscape setting), in combination with medium to tall structured native trees and vegetation, will be used to achieve the standard of not visually evident.

Except as is necessary for construction of parking area, access road, and toilet building, existing tree cover screening the proposed trailhead from key viewing areas and scenic routes shall be

retained. All materials shall be of dark, earth-toned colors found in the project area; resemble natural materials (stone, wood); retain distinctive and/or common characteristics of the landscape setting; and ensure constructed features do not become visually dominant as seen from KVAs.

Structures shall have a rustic appearance, use non-reflective materials, and have low contrast with the surrounding landscape. The planting plan includes shrubs and trees that will screen the constructed features from Wyeth Bench Road.

Botany / Invasive Plants

There are several known occurrences of sensitive plant species, including two vascular plants and two lichens, within the project area. The two lichens were documented directly along the proposed trail route and the two vascular plants were documented within the vicinity of the proposed trail route.

Habitat for Howells' daisy (*Erigeron howellii*) is comprised of steep north/northeast-facing slopes and rock and cliff faces in open to semi open areas. It is usually restricted to areas with little competition from other vegetation. This species was not documented during surveys associated with the proposed trail but is documented within 200 feet of the proposed trail. The proposed trail would not be going through the cliff or rock faces where this species occurs, so there would be no effect to these species.

Habitat for Longbearded hawkweed (*Hieracium longiberbe*) is comprised of drier area on hillsides, cliffs, rocky banks and crevices and low elevations. This species was not documented during surveys associated with proposed trail but is documented within 100 feet of the proposed trail. The proposed trail would not be going through the cliff or rock faces where this species occurs, so there would be no effect to these species.

Habitat for cabbage lungwort (*Lobaria linita*) includes rock, mossy hummocks, and the lower boles, trunks, and branches of conifers and deciduous trees and shrubs. It grows on tree boles, at lower elevations, in the western Cascade Mountains in older coniferous forests. It is most common in northwestern Washington in Pacific silver fir and western hemlock forests. This species was found growing on trees in the project area. Duplicate tube lichen (*Hypogymnia duplicate*), grows as an epiphyte on mountain hemlock, western hemlock, Pacific silver fir, Douglas-fir and subalpine fir in old-growth forests of the western Cascades and was documented growing on a tree branch in the project area. Both of these species are Category A, survey and manage species and require management of all known sites and minimization of inadvertent loss of undiscovered sites.

For trail construction, the removal or destruction of trees, or altering of the microclimate through altering the forest structure, are all direct effects that could impact both individuals and habitat. The project does not involve the removal of large or old-growth trees. Forest Service approval would be required prior to removal of any trees greater than 11" DBH and would ensure no effects to *Lobaria linita* and *Hypogymnia duplicate* would result.

Wildlife

The proposed trail system occurs within, or in close proximity to, three priority habitats including old-growth forest, riparian, and snags and logs. Snags and downed logs are scattered throughout

the project area and vicinity, particularly in portions of the project area within the Eagle Creek Fire (2017) burn area. No known perennial, fish bearing streams are crossed by the proposed trail system.

The project area is located entirely within lands designated by the Oregon Department of Fish and Wildlife (ODFW) as winter range for ungulates. Forested wildlife habitat (e.g. relatively closed canopy fir, big-leaf maple, basalt cliffs, and open talus) is abundant in the surrounding area. The Eagle Creek Fire impacted vegetation in the project vicinity, however an abundance of habitat remains for wildlife species including amphibians, mollusks, cavity-nesting birds, bats that utilize trees, red tree voles, and deer and elk. No in-stream work is included.

Trail layout will ensure that no trees greater than 30" diameter at breast height (dbh) will be removed during trail construction or maintenance unless the trees are classified as hazard or danger trees. Trees ≥ 18" dbh but < 30" dbh can be removed on a limited basis (averaging no more than one tree per 1,000 feet of trail) within the 6' trail corridor (includes the trail prism and clearing area). Trees > 11 inches but < 18 inches dbh can be removed on a limited basis (averaging no more than one tree per 150 feet of trail) within the 6' trail corridor (includes the trail prism and clearing area). All felled trees will be left on site to contribute to coarse woody debris.

Construction and maintenance activities requiring the use of chainsaws, heavy equipment, or helicopter support will only occur between July 16 and February 28, with the exception of trailhead development on Wyeth Rd. To protect Oregon salamanders, ground disturbance would be minimized, and no fill would be added, to sections of trail crossing talus slopes (e.g. boulder fields).

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.

Finding: Accomplishment reports and monitoring results will be kept on file by the Forest Service. as required by agency policy.

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.

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.

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.

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.

E. Sensitive plants that will be destroyed shall be transplanted or replaced, to the maximum extent practicable. Replacement is used here to mean the establishment of a particular plant species in areas of suitable habitat not affected by new uses. Replacement may be accomplished by seeds, cuttings, or other appropriate methods. Replacement shall occur as close to the original plant site as practicable. The project applicant shall ensure that at least 75 percent of the replacement plants survive 3 years after the date they are planted.

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.

(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.

(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.

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

(9) The size of restored, enhanced, and replacement (creation) wetlands shall equal or exceed the following ratios. The first number specifies the required acreage of replacement wetlands, and the second number specifies the acreage of wetlands altered or destroyed.

Restoration: 2: 1
Creation: 3: 1
Enhancement: 4: 1

Finding: Consistent. The project design and mitigation plan serve to meet this guideline. Additional information and details can be found in the Water Resources section above.

G. Wetland creation mitigation shall be deemed complete when the wetland is self-functioning for 5 consecutive years. Self-functioning is defined by the expected function of the wetland as written in the mitigation plan. The monitoring report shall be submitted to the local government to ensure compliance. The Forest Service, in consultation with appropriate state agencies, shall extend technical assistance to the local government to help evaluate such reports and any subsequent activities associated with compliance.

Finding: The proposal meets this guideline because the new trail segments proposed do not cross any wetlands, other than a seep on an existing road, which will receive a low-water crossing rock structure to protect and maintain the tread and prevent erosion and impact to the riparian resource.

G. Recreation Resources

The Management Plan, Part I, Chapter 4 (Recreation Resources), SMA guidelines, states:

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

Finding: The proposal meets this guideline. A 0.2-mile section of the Pacific Crest National Scenic Trail (PCT) will be re-routed to allow for development of the new trail system and discourage bicycle use on the PCT. The Pacific Crest Trail Association has been involved in stakeholder discussions about the project and is supportive of the proposed re-route. The

proposed trailhead on Wyeth Rd. will allow for mountain bike access and ensure continued hiking and equestrian access from Herman Creek Campground.

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.

Finding: The proposal meets this guideline and will improve recreation opportunities for mountain bikers, equestrians, 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 miles are designed and managed for bicycle use. The proposed trailhead will help meet increasing demand for mountain biking opportunities and existing opportunities for hiking and equestrian use will also be improved.

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

Finding: The proposal meets this guideline. No motorized use will be authorized on new trails.

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

Finding: The proposal meets this guideline. Project design criteria have been incorporated to ensure visitor safety; minimize conflict between different types of users on shared use trail segments; and to discourage bicycle use in wilderness and on the PCT and Herman Creek Trail. Recreational use within the project area will be monitored and should user conflicts and/or public safety issues become a concern, additional mitigation strategies will be implemented (e.g. additional directional designations, use restrictions, and user outreach and education).

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).

Finding: The proposal meets this guideline. The proposed 25-vehicle trailhead on Wyeth Rd. will be located on lands within the SMA Forest, Recreation Intensity Class 2 (Low Intensity). SMA provisions for RIC 2 lands state that maximum design capacity for parking areas shall be 25 vehicles. The proposed trailhead is not located within ¼-mile of any other recreational developments.

6. New development and reconstruction of scenic routes (see Part III, Chapter 1: Recreation Development Plan) shall include provisions for bicycle lanes.

Finding: Guideline is not applicable. Project does not involve new development or reconstruction of scenic routes.

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 and/or increase. Statewide Comprehensive Outdoor Recreation Plan (SCORP) data and data from National Scenic Area recreation demand studies 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/or 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/or mitigation measures, the proposed use can be implemented without affecting treaty rights.

    G. Mass transportation shall be considered and implemented, if feasible, for all proposed variances to Recreation Intensity Class 4.

Finding: Guideline is not applicable. Project does not propose a variance in Recreation Intensity Class 4 guidelines for parking or campground units.

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).

Finding: Guideline is not applicable. Project does not proposal to change RICs within project area.

9. The recreation intensity classes are designed to protect recreation resources by limiting land development and land uses.

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.

Finding: Proposal meets this guideline. Sections of trail located on lands with RIC1 designation will provide opportunities for semi-primitive recreation. No parking areas are proposed on lands with RIC1 designation.

2. Recreation Intensity Class 2 (Low Intensity). The emphasis is to provide opportunities for semi-primitive recreation.

    A. Permitted uses are those that provide settings where people can participate in activities such as physical fitness, outdoor learning, relaxation, and escape from noise and crowds.

    B. The maximum site design capacity shall not exceed 70 people at one time on the site. The maximum design capacity for parking areas shall be 25 vehicles.

    C. All uses permitted in Recreation Intensity Class 1 are permitted in Recreation Intensity Class 2. The following uses may also be permitted:

        (1) Campgrounds for twenty (20) units or less, tent sites only. (Revised: U.S. Sec.Ag. concurrence 7/1/11)

(2) Boat anchorages designed for no more than 10 boats at one time.

(3) Swimming areas.

Finding: Proposal meets this guideline. Sections of trail located on lands with RIC2 designation will provide opportunities for semi-primitive recreation. The maximum design capacity for the trailhead on Wyeth Rd. will be 25 vehicles.

3. Recreation Intensity Class 3 (Moderate Intensity). The emphasis is on facilities with design themes emphasizing the natural qualities of the area. Developments are complementary to the natural landscape yet can accommodate moderate numbers of people.

A. Permitted uses are those in which people can participate in activities to realize experiences such as group socialization, nature appreciation, relaxation, cultural learning, and physical activity.

B. The maximum site design capacity shall not exceed 250 people at one time on the site. The maximum design capacity for parking areas shall be 50 vehicles. The GMA vehicle capacity level of 75 vehicles shall be allowed if enhancement or mitigation measures for scenic, cultural, or natural resources are approved for at least 10 percent of the site.

C. Accommodation of facilities for mass transportation (bus parking, etc.) shall be required for all new Recreation Intensity Class 3 day-use recreation sites, except for sites predominantly devoted to boat access.

D. All uses permitted in Recreation Intensity Classes 1 and 2 are permitted in Recreation Intensity Class 3. The following uses may also be permitted:

(1) Campgrounds with improvements that may include vehicle access, water, power, sewer, and sewage dump stations. (Revised: U.S. Sec. Ag. concurrence 7/1/11)

(2) Boat anchorages designed for not more than 15 boats.

(3) Public visitor, interpretive, historic, and environmental education facilities.

(4) Full-service restrooms that may include showers.

(5) Boat ramps.

(6) Riding stables.

Finding: Proposal meets this guideline as proposal only includes one recreation development (trailhead), trail system, and one bridge (over Dry Creek).

4. Recreation Intensity Class 4 (High Intensity). The emphasis is on providing roaded natural, rural, and suburban recreation opportunities with a high level of social interaction.

A. Permitted uses are those in which people can participate in activities to realize experiences such as socialization, cultural and natural history appreciation, and physical activity.

B. The maximum design capacity shall not exceed 1,000 people at one time on the site. The maximum design capacity for parking areas shall be 200 vehicles. The GMA vehicle capacity level of 250 vehicles shall be allowed if enhancement or mitigation measures for scenic, cultural, or natural resources are approved for at least 20 percent of the site.

C. Accommodation of facilities for mass transportation (bus parking, etc.) shall be required for all new Recreation Intensity Class 4 day-use recreation sites, except for sites predominantly devoted to boat access.

D. All uses permitted in Recreation Intensity Classes 1, 2, and 3 are permitted in Recreation Intensity Class 4.

Finding: Proposal meets this guideline as proposal only includes one recreation development (trailhead), trail system, and one bridge (over Dry Creek).

H. Conclusion

The proposed Cascade Locks Trails Project 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.