



Ouroboros Connector Trail

Hood River County, Oregon

Consistency Determination (CD-26-01-S)

Background

Following construction of the Cascade Locks Trail System (CD-21-01-S), CRGNSA staff identified that mountain bike trail users were connecting between the “Upper” and “Lower” sections of the trail system using Wyeth Road rather than an existing trail. The only trail connecting the two sections is a more technically challenging trail that is not suited for less experienced mountain bikers. CRGNSA staff propose to construct a 1,200 foot segment of trail adjacent to Wyeth Road that provides a safer path between the two sections that is more suitable for these users.

Decision

I find that the above proposal is consistent with the Management Plan for the Columbia River Gorge National Scenic Area (CRGNSA) if it is implemented as described in the application materials, the CRGNSA Consistency Determination and Findings of Fact referenced as CD-26-01-S.

Administrative Review (Appeal) Opportunities

A written request for review of the National Scenic Area Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Forest Supervisor signature below. Requests for review should be addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208. An electronic copy of the request should be provided to the USFS-CRGNSA Office at 902 Wasco Street, Suite 315, Hood River, Oregon 97031, ATTN Appeals, and/or emailed to appeals-pacificnorthwest-columbia-river-gorge-nsa@usda.gov.

Implementation Date

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

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Date: 2026.06.02
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Acting Deputy Forest Supervisor

Columbia River Gorge National Scenic Area

Date



CRGNSA Consistency Determination Ouroboros Connector Trail, CD-26-01-S Tax Lot #03N08E3400400 Hood River County, Oregon

FINDINGS OF FACT

LANDOWNER:	USDA Forest Service
APPLICANT:	USDA Forest Service
PROPOSED ACTION:	Construct a 1,200 foot long trail
LOCATION:	T03N R08E, SW1/4SW1/4 Section 34, W.M.
NATIONAL SCENIC AREA DESIGNATION:	Special Management Area
LAND USE DESIGNATION:	Forest
LANDSCAPE SETTING:	Coniferous Woodland

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



Project Site Plan



Public Comment

A notice describing the project was sent to a mailing list of known interested parties and adjacent landowners on April 24, 2026. A period of 30 days was allowed for public comment. The following comments were received:

Comment: Steven McCoy, Staff Attorney for Friends of the Columbia Gorge, submitted a comment stating the applicable standards from the Management Plan, and highlighted the requirement to ensure that there are no cumulative effects to scenic resources from the proposed trail.

Response: The proposed trail will be reviewed for consistency with the Management Plan, including the prohibition on cumulative effects to scenic resources.



Project Proposal

Following construction of the Cascade Locks Trail System (CD-21-01-S), CRGNSA staff identified that mountain bike trail users were connecting between the “Upper” and “Lower” sections of the trail system using Wyeth Bench Road rather than an existing trail. The only trail connecting the two sections is a more technically challenging trail that is not suited for less experienced mountain bikers. CRGNSA staff propose to construct a 1,200 foot segment of trail adjacent to Wyeth Bench Road that provides a safer path between the two sections that is more suitable for these users. The trail will be constructed following the standards described in the Catherine Locks Trail System decision for hikers and mountain bikers, which include a maximum width of 36 inches, limited grading, rough trail surface, and vegetation clearing above trail height up to 10 feet. The trail will connect the Ouroboros Trail at the east to the Jökulhlaup Trail at the west. These trails are only designated for hikers and mountain bikers, so the proposed connector trail will be designated for hikers and mountain bikers as well.

All Project Design Criteria from the 2021 Cascade Locks Trail EA and Consistency Determination will apply to this project. The Project Design Criteria are included here, edited to show only criteria that are applicable to the proposed connector trail.

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 inch 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 inches and 30 inches 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.

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. 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.
3. 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.

4. 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 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 inches 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.

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. To reduce the potential for transport or spread of invasive plants, all vehicles and equipment used during construction of the trail system will be washed before entering National Forest System lands.
5. 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.

Scenery and Visual Resources

1. 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.



2. 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.
3. 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 would have final approval by Forest Service scenic specialist.

Recreation

1. Trails would be clearly marked to ensure visitors know which uses are allowed on which sections of trail.

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.

Lands

1. 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.
2. Access to BPA structures shall remain open and unobstructed at all times during trail construction and maintenance.

Land Use Designation

The proposed trail is located within the SMA Forest Land Use Designation. Management Plan Part II, Chapter 2 – Forest Land, SMA Review Use 1.I allows “Public recreation, commercial recreation, interpretive and educational development, and uses consistent with the provisions of Part I, Chapter 4: Recreation Resources.”

Finding: Specific review of Recreation Resources guidelines can be found below. The proposed trail is within an area designated Recreation Intensity Class 1, which allows the construction of new trails. The trail will be open to the public. The proposed trail is an allowable use, subject to review for compliance with scenic, cultural, natural, and recreational resources guidelines.



Scenery

SMA Design Guidelines Based on Landscape Settings

Finding: The site is within the Coniferous Woodland Landscape Setting.

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

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

(1) Buildings designed to have a vertical overall appearance in the Coniferous Woodland landscape setting and a horizontal overall appearance in the Oak-Pine Woodland landscape setting shall be encouraged.

(2) Use of plant species native to the landscape setting. Examples of native species are identified in the Scenic Implementation Handbook as appropriate to the area shall be encouraged. Where non-native plants are used, they shall have native-appearing characteristics.

Finding: No buildings are proposed. Use of native plant species, if necessary, is included in the project design criteria for the project. This condition is met.

SMA Guidelines for Development and Uses Visible from KVAs

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

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

KVA	FOREGROUND	MIDDLEGROUND	BACKGROUND
Wyeth Bench Road	X	X	
Columbia River	X		
Pacific Crest Trail		X	
SR 14		X	

2. New development and land uses shall be evaluated to ensure that the required scenic standard is met and that scenic resources are not adversely affected, including cumulative effects, based on the degree of visibility from key viewing areas.

Finding: The proposed trail is adjacent to Wyeth Bench Road KVA and the development site is topographically visible from the KVA. Intervening vegetation will fully obscure the trail from view of other listed KVAs, and the trail itself will not be apparent to the casual viewer within the Columbia River, Pacific Crest Trail, or SR 14 KVAs. The findings below demonstrate that the required scenic standard is met and that there are no adverse effects



to scenic resources, because of the limited scale of development and because the trail is sited to blend with the form, line, color, and texture of the surrounding landscape. Because there are no adverse effects, there are no cumulative effects.

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

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 proposed trail is located within the Coniferous Woodland landscape setting and the Forest Land Use Designation. The scenic standard is *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 development or land uses shall be sited to achieve the applicable scenic standard. Development shall be designed to fit the natural topography, to take advantage of landform and vegetation screening, and to minimize visible grading or other modifications of landforms, vegetation cover, and natural characteristics. When screening of development is needed to meet the scenic standard from key viewing areas, use of existing topography and vegetation shall be given priority over other means of achieving the scenic standard such as planting new vegetation or using artificial berms.

Finding: The proposed trail follows the existing topographic contours and will be sited to retain existing trees above 11 inches diameter at breast height, unless those trees are necessary to remove for safety reasons. If trees above 11 inches DBH are removed, consultation with the CRGNSA Landscape Architect is required. Project design criteria require that stumps of removed trees are low cut to 8 inches tall or less, with dirt added to the cut face of the stump, and that the downed wood is retained on site in whole pieces (not bucked into smaller pieces).

The proposed trail will blend with adjacent natural elements, not existing development. Because the trail follows topographic contours, it will minimize grading and removal of vegetative cover. 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. No additional screening is proposed. Guidelines 4 and 5 are met.

6. The extent and type of conditions applied to a proposed development or use to achieve the scenic standard shall be proportionate to its degree of visibility from key viewing areas.

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

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

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

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

Finding: The proposed trail is topographically visible within the foreground and middleground of the Wyeth Bench Road, Columbia River, Pacific Crest Trail, and SR 14 KVAs. Because of existing vegetation, design features and project design criteria, the proposed trail would not be noticeable to the casual viewer as seen from KVAs once ground disturbance has been revegetated and stumps have aged. This guideline is met.

7. Sites approved for new development to achieve scenic standards shall be consistent with guidelines to protect wetlands, riparian corridors, sensitive plant or wildlife sites and the buffer zones of each of these natural resources, and guidelines to protect cultural resources.

Finding: See Natural Resource and Cultural Resource sections below. Scenic standards are consistency with review for those resources. This guideline is met.

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

Finding: The proposed development does not protrude above the line of a bluff, cliff, or skyline as visible from KVAs. This guideline is 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: The proposed structure is a trail which will remain well below average tree canopy height. This guideline is 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: No new landscaping is proposed. This guideline does not apply.

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: The proposed trail will be the color of the rocks and soil at the site. This guideline is met.

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

Finding: The proposed trail will be constructed of rocks and soil which are at a minimum low reflectivity materials. This guideline is met.



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

Finding: No lighting is proposed. This guideline does not apply.

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

Finding: No lighting is proposed. This guideline does not apply.

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

- A. Application of the landscape setting design guidelines, if applicable.
- B. A defined study area surrounding the development that includes at least ten existing buildings, not including existing buildings within urban areas or outside the National Scenic Area.
- C. Individual evaluations of scale for each separate proposed building in the application and each separate building in the study area, including:
 - (1) All finished above ground square footage;
 - (2) Total area of covered decks and porches;
 - (3) Attached garages
 - (4) Daylight basements
 - (5) Breezeways, if the breezeway shares a wall with an adjacent building
 - (6) Dimensions, based on information from the application or on Assessor's records D.
An overall evaluation demonstrating the proposed development's compatibility with surrounding development. Buildings in the vicinity of the proposed development that are significantly larger in size than the rest of the buildings in the study area should be removed from this evaluation.

Finding: No new buildings are proposed. This guideline does not apply.

SMA Guidelines for KVA Foregrounds and Scenic Routes

Finding: The project is within the foreground of the Wyeth Bench Road KVA. It is not within view of a scenic route.

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

Finding: This guideline does not apply.



2. Scenic highway corridor strategies shall be implemented for Interstate 84 (I84), Washington State Route 14 (SR 14) and the Historic Columbia River Highway (HCRH). For I-84, SR 14 and the HCRH, this involves ongoing implementation (and possible updating) of the associated existing documents.

3. The goals of scenic corridor strategies shall include:

- 1) providing a framework for future highway improvements and management that meet Management Plan scenic guidelines and public transportation needs; and
- 2) creating design continuity for the highway corridor within the National Scenic Area. Corridor strategies shall, at minimum, include design guidelines (e.g. materials, conceptual designs, etc.) for typical projects that are consistent with Management Plan scenic resources provisions and an interdisciplinary, interagency project planning and development process.

Finding: Guidelines 2 and 3 refer to development of strategy documents and are not applicable to this proposal.

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.

B. Findings must evaluate the following:

- (1) The limiting factors to meeting the required scenic standard and 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.

C. Form, line, color, texture, and design of a proposed development shall be evaluated to ensure that the development blends with its setting as visible 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 - 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 - Textures 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 - 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.

Finding: The trail will cross Wyeth Bench Road to connect the Ouroboros Trail to the Connector Trail. Within the developed prism of the road KVA, the trail will effectively only exist administratively; trail construction will occur outside of the road prism, and the trail itself within the road prism will only consist of the path between two connector points made by trail users. These guidelines do not apply.

5. Right-of-way vegetation shall be managed to minimize visual impacts of clearing and other vegetation removal as visible from key viewing areas. Roadside vegetation management (vista clearing, planting, etc.) should enhance views from the highway.

Finding: No right-of-way vegetation management is proposed. This guideline does not apply.

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

Finding: The proposal does not include road maintenance, warehousing, or stockpile areas. This guideline does not apply.

SMA Guidelines for Areas Not Visible from KVAs

Finding: The proposed trail is visible from KVAs. These guidelines do not apply.



Cultural

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 if possible recover the resource. If the discovered material is suspected to be human bone or a burial, the following procedures shall be used:
 - A. The applicant shall stop all work in the vicinity of the discovery.
 - B. The applicant shall immediately notify the Forest Service, the applicant's cultural resource professional, the county coroner, and appropriate law enforcement agencies.
 - C. The Forest Service shall notify the tribal governments if the discovery is determined to be an Indian burial or a cultural resource.
4. Reviewing agencies shall use the [...] steps under 36 CFR 800.4 for assessing potential effects to cultural resources and 36 CFR 800.5 for assessing adverse effects to cultural resources. [The Management Plan includes descriptions of these steps. The descriptions have been removed from this document.]
5. Determination of potential effects to significant cultural resources shall include consideration of cumulative effects of proposed developments that are subject to any of the following: 1) a reconnaissance or historic survey; 2) a determination of significance; 3) an assessment of effect; or 4) a mitigation plan.

Finding: A cultural resource report was prepared by CRGNSA Heritage Resource staff for the proposed trail. The report was submitted to Oregon SHPO and the Tribes on April 17, 2026. The 30-day review period ended on May 18, 2026. CRGNSA Heritage Resource staff determined that the proposed treatments would have no effect to historic properties (36 CFR 800.4(d)(1)). Oregon SHPO concurred with the determination of no effect to historic properties on May 11, 2026. One comment was received from the Confederated Tribes of Warm Springs requesting additional information, which was provided. No additional comments or responses were received from Warm Springs or the other Tribes.

Project Design Criteria require that the inadvertent discovery procedure described above is followed in the event that cultural resources are discovered during construction. These guidelines are met.



Natural Resources

SMA Guidelines: Water Resources / Wildlife and Plants

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

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

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

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

(2) Buffer zones shall be measured outward from the bank full flow boundary for streams, the high water mark for ponds and lakes, the normal pool elevation for the Columbia River, and the wetland delineation boundary for wetlands on a horizontal scale that is perpendicular to the wetlands, stream, pond or lake boundary. On the main stem of the Columbia River above Bonneville Dam, buffer zones shall be measured landward from the normal pool elevation of the Columbia River. The following buffer zone widths shall be required:

(a) A minimum 200-foot buffer on each wetland, pond, lake, and each bank of a perennial or fish bearing stream, some of which can be intermittent.

(b) A 50-foot buffer zone along each bank of intermittent (including ephemeral), non-fish bearing streams.

(c) Maintenance, repair, reconstruction and realignment of roads and railroads within their rights-of-way shall be exempted from the wetlands and riparian guidelines upon demonstration of all of the following:

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

(ii) The wetland is not critical habitat.

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

(3) The buffer width shall be increased for the following:

(a) When the channel migration zone exceeds the recommended buffer width, the buffer width shall extend to the outer edge of the channel migration zone.



(b) When the frequently flooded area exceeds the recommended riparian buffer zone width, the buffer width shall be extended to the outer edge of the frequently flooded area.

(c) When an erosion or landslide hazard area exceeds the recommended width of the buffer, the buffer width shall be extended to include the hazard area.

(4) Buffer zones can be reconfigured if a project applicant demonstrates all the following: (1) the integrity and function of the buffer zone is maintained, (2) the total buffer area on the development proposal is not decreased, (3) the width reduction shall not occur within another buffer, and (4) the buffer zone width is not reduced more than 50% at any particular location. Such features as intervening topography, vegetation, man-made features, natural plant or wildlife habitat boundaries, and flood plain characteristics could be considered.

(5) Requests to reconfigure buffer zones shall be considered if an appropriate professional (botanist, plant ecologist, wildlife biologist, or hydrologist) hired by the project applicant (1) identifies the precise location of the rare wildlife/plant or water resource, (2) describes the biology of the rare wildlife/plant or hydrologic condition of the water resource, and (3) demonstrates that the proposed use will not have any negative effects, either direct or indirect, on the affected wildlife/plant and their surrounding habitat that is vital to their long-term survival or water resource and its long-term function.

(6) The local government shall submit all requests to re-configure rare wildlife/plant or water resource buffers to the Forest Service and the appropriate state agencies for review. All written comments shall be included in the project file. Based on the comments from the state and federal agencies, the local government will make a final decision on whether the reconfigured buffer zones are justified. If the final decision contradicts the comments submitted by the federal and state agencies, the local government shall justify how it reached an opposing conclusion.

Finding: No water resources are present in the vicinity of the trail. A drainage on the south side of Wyeth Bench Road collects water seasonally, but does not produce a defined channel or bed and as such does not meet the definition of “stream” in the Management Plan. This guideline is met.

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: No water resources are present. This guideline does not apply.

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

Finding: No water resources are present. This guideline does not apply.

D. Wetlands Boundaries shall be delineated using the following:



(1) The approximate location and extent of wetlands in the National Scenic Area is shown on the National Wetlands Inventory (U.S. Department of the Interior). In addition, the list of hydric soils and the soil survey maps shall be used as an indicator of wetlands.

(2) Some wetlands may not be shown on the wetlands inventory or soil survey maps. Wetlands that are discovered by the local planning staff during an inspection of a potential project site shall be delineated and protected.

(3) The project applicant shall be responsible for determining the exact location of a wetlands boundary. Wetlands boundaries shall be delineated using the procedures specified in the 'Corps of Engineers Wetland Delineation Manual (on-line edition)' and applicable Regional Supplements.

(4) All wetlands delineations shall be conducted by a professional who has been trained to use the federal delineation procedures.

Finding: No water resources are present. This guideline does not apply.

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: No water resources are present. This guideline does not apply.

F. The local government may verify the accuracy of, and render adjustments to, a bank full flow, high water mark, normal pool elevation (for the Columbia River), or wetland boundary delineation. If the adjusted boundary is contested by the project applicant, the local government shall obtain professional services, at the project applicant's expense, or the local government will ask for technical assistance from the Forest Service to render a final delineation.

Finding: No water resources are present. This guideline does not apply.

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

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

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

(2) Filling and draining of wetlands shall be prohibited with exceptions related to public safety or restoration/enhancement activities as permitted when all of the following criteria have been met:

(a) A documented public safety hazard exists or a restoration/ enhancement project exists that would benefit the public and is corrected or achieved only by impacting the wetland in question, and

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



(c) The proposed project minimizes the impacts to the wetland.

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

Finding: No water resources are present. This guideline does not apply.

I. Proposed uses and development within wetlands, streams, ponds, lakes, riparian areas and their buffer zones shall be evaluated for cumulative effects to natural resources and cumulative effects that are adverse shall be prohibited.

Finding: No water resources are present. This guideline does not apply.

3. Wildlife and Plants

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

Finding: CD-21-01-S, which authorized the construction of the trail system, stated that the following sensitive plant species were in the area:

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

CD-21-01-S stated that the following wildlife sites/areas were in the area:

- Larch Mountain Salamander
- Priority Riparian Habitat
- Priority Old Growth Forest
- Priority Talus Habitat
- Northern spotted owl

CRGNSA Wildlife Biologist and Botanist reviewed CD-21-01-S and determined that these wildlife and plant areas and sites were not present in the area of the proposed trail. The Botanist determined that no sensitive plant species were within 1,000 feet of the proposed trail. The Wildlife Biologist determined that elk winter range is within 1,000 feet of the proposed trail. The proposed trail will be reviewed for consistency with these guidelines.

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



wildlife issues and by the Oregon Biodiversity Information Center or Washington Natural Heritage Program for plant issues).

Finding: A site plan was included in the application. This guideline is met.

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

- (1) Identify/verify the precise location of the wildlife or plant area or site,
- (2) Determine if a field survey will be required,
- (3) Determine, based on the biology and habitat requirements of the affected wildlife/plant species, if the proposed use would compromise the integrity and function of or result in adverse effects (including cumulative effects) to the wildlife and plant area or site. This would include considering the time of year when wildlife and plant species are sensitive to disturbance, such as nesting and rearing seasons, or flowering season, and,
- (4) Delineate the undisturbed 200-ft buffer on the site plan for rare plants or the appropriate buffer for rare wildlife areas or sites, including nesting, roosting, and perching sites.
 - (a) Buffer zones can be reconfigured if a project applicant demonstrates all of the following: (1) the integrity and function of the buffer zones is maintained, (2) the total buffer area on the development proposal is not decreased, (3) the width reduction shall not occur within another buffer, and (4) the buffer zone width is not reduced more than 50% at any particular location. Such features as intervening topography, vegetation, man made features, natural plant or wildlife habitat boundaries, and flood plain characteristics could be considered.
 - (b) Requests to reduce buffer zones shall be considered if an appropriate professional (botanist, plant ecologist, wildlife biologist, or hydrologist), hired by the project applicant, (1) identifies the precise location of the rare wildlife/plant or water resource, describes the biology of the rare wildlife/plant or hydrologic condition of the water resource, and (3) demonstrates that the proposed use will not have any negative effects, either direct or indirect, on the affected wildlife/plant and their surrounding habitat that is vital to their long-term survival or to the water resource and its long-term function.
 - (c) The local government shall submit all requests to re-configure rare wildlife/plant or water resource buffers to the Forest Service and the appropriate state agencies for review. All written comments shall be included in the record of application and based on the comments from the state and federal agencies, the local government will make a final decision on whether the reduced buffer zone is justified. If the final decision contradicts the comments submitted by the federal and state agencies, the local government shall justify how it reached an opposing conclusion.



Finding: The CRGNSA Wildlife Biologist and Botanist conducted surveys of the proposed trail to evaluate whether protected animal or plant species were present. No known sensitive plants or sites were identified. The Wildlife Biologist identified evidence of elk in the vicinity, and noted that the seasonal drainage north of the proposed trail was good habitat for species that use surface and subsurface features (logs, deep leaf litter, wet environments). However, no known sensitive wildlife species or sites were identified in that drainage. This guideline is met.

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

- (1) Published guidelines regarding the protection and management of the affected wildlife/plant species. Examples include: the Oregon Department of Forestry management guidelines for osprey and great blue heron; Washington Department of Wildlife guidelines for a variety of species, including the western pond turtle, the peregrine falcon, and the Larch Mountain salamander.
- (2) Physical characteristics of the subject parcel and vicinity, including topography and vegetation.
- (3) Historic, current, and proposed uses in the vicinity of the rare wildlife/plant area or site.
- (4) Existing condition of the wildlife/plant area or site and the surrounding habitat of the area or site.
- (5) In areas of winter range, habitat components, such as forage and thermal cover, important to the viability of the wildlife must be maintained or, if impacts are to occur, enhancement must mitigate the impacts so as to maintain overall values and function of winter range.
- (6) The site plan is consistent with published guidance documents such as "Oregon Guidelines for Timing of In-Water Work to Protect Fish and Wildlife Resources" (Oregon Department of Fish and Wildlife 2008 or most recent version) and Washington's Aquatic Habitat Guidelines (2002 or most recent version).
- (7) The site plan activities coincide with periods when fish and wildlife are least sensitive to disturbance. These would include, among others, nesting and brooding periods (from nest building to fledgling of young) and those periods specified.
- (8) The site plan illustrates that new development and uses, including bridges, culverts, and utility corridors, shall not interfere with fish and wildlife passage.
- (9) Maintain, protect, and enhance the integrity and function of Priority Habitats as listed on the following Priority Habitats Table 1. This includes maintaining structural, species, and age diversity, maintaining connectivity within and between plant communities, and ensuring that cumulative impacts are considered in documenting integrity and function.



Finding: CRGNSA staff reviewed the above criteria in determining the potential effects to sensitive species from the proposed trail. This guideline is met.

E. The wildlife/plant protection process may terminate if the local government, in consultation with the Forest Service and state wildlife agency or heritage program, determines (1) the rare wildlife area or site is not active, or (2) the proposed use is not within the buffer zones and would not compromise the integrity of the wildlife/plant area or site, or (3) the proposed use is within the buffer and could be easily moved out of the buffer by simply modifying the project proposal (site plan modifications). If the project applicant accepts these recommendations, the local government shall incorporate them into its development review order and the wildlife/plant protection process may conclude.

Finding: The CRGNSA Wildlife Biologist determined that elk move through the area of the proposed trail. Oregon Department of Fish and Wildlife maps show that the area is within deer and elk winter range. Deer and elk winter range does not have an associated buffer. The Wildlife Biologist determined that the addition of an additional 1,200 foot section of trail would not compromise the integrity of the area as winter range. This guideline is met.

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: There are no adverse effects to wildlife or plant areas or sites. This guideline does not apply.

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.

Finding: The Forest Service is the action agency. This guideline does not apply.

H. Based on the comments from the state and federal wildlife agency/heritage program, the local government shall make a final decision on whether the proposed use would be consistent with the wildlife/plant policies and guidelines. If the final decision contradicts the comments submitted by the state and federal wildlife agency/heritage program, the local government shall justify how it reached an opposing conclusion.

Finding: The Forest Service is the action agency. This guideline does not apply.

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

Finding: There are no adverse effects to wildlife or plant areas or sites. This guideline does not apply.



Practicable Alternative Test

Finding: There are no effects to Natural Resources that require the use of the Practicable Alternative Test. These guidelines do not apply and have been deleted.

Mitigation Plan

Finding: There are no effects to Natural Resources that require the preparation of a Mitigation Plan. These guidelines do not apply and have been deleted.



Recreation

SMA Guidelines

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

Finding: The proposed trail is an addition to an existing recreational use, and will not displace existing recreational use. This guideline is met.

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

Finding: The proposed trail is an addition to an existing recreational use, and will have beneficial effects to the recreation resources on site by providing a safe connection between the Ouroboros Trail and the Jökulhlaup Trail, moving users off of Wyeth Bench Road. Because there are no adverse effects, there are no cumulative adverse effects. This guideline is met.

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

Finding: No motorized uses are proposed. This guideline is met.

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

Finding: There are no adverse effects, therefore no mitigation measures are required. This guideline does not apply.

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

Finding: The proposed trail is not a recreation facility. This guideline does not apply.

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

Finding: The proposed trail is not a scenic route. This guideline does not apply.

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

A. Demand and use levels for the proposed activity(s), particularly in the area where the site is proposed, are high and expected to remain so or increase. Statewide Comprehensive Outdoor Recreation Plan (SCORP) data and data from the National Visitor Use Monitoring Program shall be relied upon to meet the criterion in the absence of current applicable studies.

B. The proposed use is dependent on resources present at the site.

C. Reasonable alternative sites offering similar opportunities, including those in urban areas, have been evaluated, and it has been demonstrated that the proposed use cannot be adequately accommodated elsewhere.



- D. The proposed use is consistent with the goals, objectives, and policies in this chapter.
- E. Through site design and mitigation measures, the proposed use can be implemented without adversely affecting scenic, natural, or cultural resources and adjacent land uses.
- F. Through site design and mitigation measures, the proposed use can be implemented without affecting or modifying treaty rights.

Finding: No parking areas are proposed. This guideline does not apply.

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

Finding: No changes to the Recreation Intensity Class are proposed. This guideline does not apply.

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

Finding: Review for consistency with the Recreation Intensity Class guidelines are below.

Recreation Intensity Classes SMA Guidelines

1. Recreation Intensity Class 1 (Very Low Intensity)

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

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

- A. The maximum design capacity for parking areas shall be 10 vehicles.
- B. The following uses may be permitted:
 - (1) Trails and trailheads.
 - (2) Parking areas.
 - (3) Dispersed campsites accessible only by a trail.
 - (4) Viewpoints and overlooks.
 - (5) Picnic areas.



- (6) Signs.
- (7) Interpretive exhibits and displays.
- (8) Restrooms.
- (9) Accommodations for mass transportation facilities should be considered where compatible with the social and physical settings.

Finding: The proposed trail is located within an area designated Recreation Intensity Class 1. Trails are an allowable use within this RIC. The proposed trail is adjacent to Wyeth Bench Road. Because the trail is a connector between two hiking and mountain biking areas, visitor encounters are likely but will be brief, and the trail characteristics (narrow single-track) will encourage visitors to pass by rather than linger and create a perception of crowdedness. The trail will be predominantly natural, leaving rocks and roots in place and following existing topographic contours, ensuring that the physical and managerial setting remains rustic.

The Facility Design Guidelines do not apply to trails. No mass transportation facilities are considered because the proposal is not a trailhead or other facility that can accommodate that use. This guideline is met.

Conclusion

The proposed 1,200 foot trail connecting the Ouroboros Trail and the Jökulhlaup Trail 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.



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