Washington Eastside Forest Health and Resilience

Skamania and Klickitat Counties, Washington

Consistency Determination (CD-26-03-S)

Background

National Forest System (NFS) lands within the project area are characterized by a range of ecological zones and vegetation types, including ponderosa pine-Douglas-fir dominated forests, conifer-hardwood mixed forests, hardwood dominated woodlands, oak savanna, grasslands, and meadows. While each of these areas have unique ecological attributes, they are all experiencing increasing threats from drought, more frequent and intense outbreaks of insects and disease, and spread of non-native invasive species that have increased the risk and intensity of wildfires. In all areas proposed for treatment, current condition assessments and field data collection show increased stress and mortality of ponderosa pine, Douglas-fir, and Oregon white oak.

Healthy functioning forests are not only important for the ecosystem services they provide across the Columbia River Gorge National Scenic Area (CRGNSA), but also because they provide resilience in the face of increasingly intense and lengthy wildfire seasons. Nearly every unit proposed for treatment on NFS lands is less than 2 miles from a community or residential area. Without intervention, these natural areas would continue to decline in health over time, remain more vulnerable to increased spread of insects and disease, and are at increased risk of experiencing uncharacteristic, large-scale wildfire.

The purpose of this project is to improve forest health, ecosystem resilience, and wildlife habitat while also reducing the risk of impacts from wildfire to communities adjacent to NFS lands. There is a need to improve forest health and increase landscape resilience so that disturbance events do not lead to uncharacteristic loss of habitat.

Decision

I find that the proposed action 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 and the CRGNSA Consistency Determination and Findings of Fact referenced as CD-26-03-S. Because the Project Design Criteria described below ensure consistency with the Management Plan, there are no additional conditions of approval.

Administrative Review (Appeal) Opportunities

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

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.

MARIN PALMER Digitally signed by MARIN PALMER
Date: 2026.10.29 15:06:21 -07'00'

MARIN PALMER Date
Acting Forest Supervisor
Columbia River Gorge National Scenic Area

CRGNSA Consistency Determination Washington Eastside Forest Health and Resilience, CD-26-03-S Skamania and Klickitat Counties, Washington

Findings of Fact

LANDOWNER:	**USDA Forest Service - CRGNSA**
APPLICANT:	**USDA Forest Service – CRGNSA**
PROPOSED ACTION:	**Resource Enhancement through Forest Practices**
LOCATION:	**Vicinity of Drano Lake, and within Catherine and Major Creek watersheds**
NATIONAL SCENIC AREA DESIGNATION:	**Special Management Area and General Management Area**
LAND USE DESIGNATION:	**Agriculture, Forest, Open Space, Recreation**
LANDSCAPE SETTING:	**Gorge Walls, Canyons and Wildlands; Oak 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

The project maps included with the application are attached to the end of this Consistency Determination.

Public Comment

A notice describing the project was sent to a mailing list of known interested parties and adjacent landowners on June 23, 2026. A period of 30 days was allowed for public comment. The following comments were received:

Comment: Steve McCoy, representing Friends of the Columbia Gorge, stated that the project must follow application standards, be reviewed for whether it is an allowable use, and meet resource protection guidelines from the Management Plan.

Response: CRGNSA staff prepared this Consistency Determination to show adherence to the standards and resource protection guidelines of the Management Plan.

Project Proposal

Proposed forest practice treatments include:

- small diameter conifer thinning (≤ 10 inches DBH)
- small diameter oak thinning (≤ 6 inches DBH)
- select tree release involving removal of trees up to 30 inches DBH within 40 feet of select high habitat value trees
- ladder fuel reduction up to 10 feet from the ground
- mowing and brushing
- piling and pile burning
- snag creation
- down wood creation
- mechanical removal of vegetation along roadways.

Implementing these actions will reduce competition between trees, improving growth conditions for the trees that remain and increasing their resilience to drought, insects and disease, invasive species, and wildfire. Approximately 1,464 acres will be authorized for treatment across the project area. Table 1 shows the number of acres proposed for treatment by vegetation type. Vegetation types are defined as ponderosa pine-Douglas-fir dominated forests (referred to as conifer), conifer-hardwood mixed forests (referred to as conifer/hardwood), hardwood dominated woodlands (referred to as hardwood), and grasslands.

Table 1. Number of acres authorized for treatment within the project area by vegetation type.

Vegetation Type	**Number of Acres within Project Area**
Conifer	724
Conifer/Hardwood	526
Hardwood	152
Grassland	61
Total Acres Authorized for Treatment	**1,464**

The Forest Service will reduce tree density through non-commercial thinning, increase the number and quality of snags and large downed wood, and implement pile burning across the project area to improve wildlife habitat and ecological health while increasing resilience to wildfire.

The proposed action was developed to be consistent with the Desired Forest Structure and Pattern table in the Management Plan (CRGNSA Management Plan, pg. 200). No openings will be established as part of this project and no measurable changes in unit-wide canopy cover will occur from treatments since larger overstory trees will remain and primarily understory vegetation will be removed. Proposed treatments vary by vegetation type as described in *Table 2*.

Table 2. A summary of authorized actions for each vegetation type within the project area.

Treatment Type	Vegetation Types			
	Conifer	**Conifer/Hardwood**	**Hardwood**	**Grassland**
Small Diameter Conifer Thinning (≤ 10 inches DBH)	X	X	X	X
Small Diameter Oak Thinning (≤ 6 inches DBH)	X	X	X	-
Select Tree Release	X	X	X	-
Ladder Fuel Reduction (LFR)	X	X	X	-
Mowing/Brushing	X	X	X	X
Piling and Pile Burning	X	X	X	X
Snag Creation	X	X	X	-
Down Wood Creation	X	X	-	-
Mechanical Removal	X	X	X	-
An X indicates which treatments could occur within each vegetation type.				

Treatments include a suite of activities to achieve the desired habitat enhancement and wildfire risk reduction outcomes. These activities include:

Small Diameter Conifer Thinning: Cutting of small diameter trees less than or equal to 10 inches Diameter at Breast Height (DBH) to reduce vertical and horizontal connectivity of fuels, to reduce competition among growing trees, and to shift species composition toward drought and fire tolerant species. In conifer and conifer-hardwood mixed stands, target species for removal will include Douglas-fir, grand fir, ponderosa pine, and bigleaf maple. In hardwood stands and grasslands, target species will include but are not limited to Douglas-fir and ponderosa pine.

Small Diameter Oak Thinning: Cutting of generally less than or equal to 6 inches DBH oak underneath existing trees to reduce stem densities, increase vigor of remaining trees, and promote forest health. In hardwood and conifer-hardwood mixed stands, oak dominated areas with greater than 200 stems per acre will be thinned to that density. Materials will be either lopped and scattered or piled for pile burning. Areas currently showing increased oak tree mortality or symptoms of drought stress will be prioritized for treatment.

Select Tree Release: Felling Douglas-fir, ponderosa pine, big leaf maple, or other non-native tree species less than or equal to 30-inch DBH within a 40-foot horizontal distance from select high habitat value

trees. Releasing select trees will improve structural diversity, wildlife habitat, and ecosystem function with the goal of protecting the oldest, largest, most mature trees in the stand.

Ladder Fuel Reduction: Cutting of limbs and shrubs to reduce ladder fuels up to 10 feet from the ground. Treatments reduce vertical and horizontal connectivity of fuels and reduce the potential for fire to move into the tree crowns. This treatment shifts forest structure toward fire resilience.

Mowing/Brushing: Using machinery or hand equipment to reduce fuel loading among grasses and forbs in key areas at high risk of human caused ignitions. Treatments will improve native plant communities and species diversity and reduce horizontal connectivity of fuels. Treatments will target grasslands, meadows, oak savanna, and to a lesser extent, oak woodlands.

Piling and Pile Burning: Piling materials smaller than 8-inches DBH generated from treatments and their burning. Pile burning is used near values at risk such as the wildland-urban interface or during initial burning where fuels reduction is needed. Some piles may be retained for wildlife habitat. Piles will be burned within 3 years of treatment. Pile burning will be conducted in accordance with requirements of state and local agency air quality regulations and Washington's Smoke Management Plan. Additional public notification and engagement will occur prior to any pile burning.

Snag Creation: Creating snags where possible for wildlife habitat. The Desired Forest Structure and Pattern Table in the Management Plan provides snag requirements by Management Plan vegetation type (CRGNSA Management Plan, pg. 200) and will be implemented to meet these requirements. Snag requirements applicable to this project include five snags greater than 10 inches DBH and 3 snags greater than 20 inches DBH per acre. Snags must be at least 20 feet in height. Dead branches of live oak trees within the diameter threshold are acceptable as snags. Snag creation will be implemented based on recommendations of the Forest Service Botanist and Wildlife Biologist.

Down Wood Creation: Trees greater than 8-inches in diameter will be left on the ground and intact, where possible, to provide wildlife habitat, structural diversity, and long-term sources of organic material for soil health. The Management Plan requirements range from 1-to-3 pieces per acre in the Ponderosa pine and Oregon white oak type to 3-to-6 pieces per acre in the East Conifer type. These pieces must be greater than 20 inches in diameter at the large end and 30 feet long. This applies to the Conifer vegetation type identified for this project.

Mechanical Removal: Along existing roadways where heavy equipment can reach trees without traveling off road, trees associated with any of the above prescriptions may be removed, either cut or with root wads attached, for non-commercial purposes using heavy equipment.

Project Design Criteria

The following project design criteria are included with the project proposal and will be followed prior to and during project implementation.

Botany

- For identified rare plant areas or sites, an undisturbed 200-foot buffer shall be delineated prior to work beginning unless the appropriate Forest Service Botanist approves a different buffer or configuration.
- To ensure invasive plants are not brought into the project area, clean any equipment before entering National Forest System lands. Remove mud, dirt, and plant parts from project equipment before moving it into the project area and before proceeding to the next planning unit.
- To ensure invasive plants are not brought into the project, all source material (gravel, rocks, soil, etc.) being imported to the project will first be certified weed-free or inspected by a Forest Service Botanist for weed presence. An alternate source may be required if the material is found to be infested.
- To reduce the spread of invasive plants, all personnel will use a boot brush before entering the planning unit and in the planning unit when leaving so no invasive plant seeds are carried between planning units.
- Invasive plants documented in the project area will be treated as needed with herbicide or other appropriate method (such as manual removal) prior to project implementation. Follow-up treatments and monitoring will occur as needed.
- Invasive plants documented and mapped in the project will be avoided as much as possible. Do not park or use heavy equipment in specified areas to the extent possible.
- Disturbance to seasonally wet areas where rare plants may exist shall be avoided, these areas will be flagged by the Forest Service Botanist before work begins.
- Do not place piles in or within 20 horizontal feet of seasonally moist areas or other wet areas.
- Reseed burned area footprints with native seed mix to prevent invasive plant infestations.
- Where identified, as necessary, disturbed ground will be seeded with genetically appropriate locally sourced native seed. Appropriate species will be determined by the Forest Service Botanist.

Hydrology

- Prior to project implementation within 0.5 miles of any water resource, appropriate resource buffers will be delineated on the ground and approved by the Forest Service Hydrologist.
- Wet season operations, typically defined as the period between December and June, will be reviewed and approved by Forest Service Hydrologist or Soil Scientist.
- Within water resource protection buffers, trees between 10 inches and 20 inches DBH may be felled but not removed. Felling trees over 20 inches DBH within a buffer shall require advance, site-specific approval from the Forest Service Hydrologist or the responsible project official.
- Lop and scatter treatments should be the primary treatment within water resource buffers.
- Slash piles shall be created outside water resource buffers. Water resource buffers shall be presumed to be 200 feet, unless the Forest Service Hydrologist determines that the 50-foot buffer shall apply.
- Soil disturbance shall be minimized and shall not exceed 15 percent of the project area.
- Areas recently disturbed by equipment operations, fire, or other human activities should be protected and not re-treated in order to maintain soil productivity. Forest Service staff will identify these areas prior to implementation.

Wildlife

- To protect deer and elk winter range between December 15 and April 1:
    - If large herds of ungulates (50 or more individuals) are observed in a treatment area, crews should consult with the USFS Wildlife Biologist prior to implementation.
- To protect northern spotted owl, a timing restriction applies from March 1 to July 15. The timing restriction applies within identified NSO habitat, and within a 66 yard buffer around identified habitat. The CRGNSA Wildlife Biologist will determine the location of NSO habitat prior to any project activities proposed within NSO habitat during the timing restriction.
- To protect Western gray squirrel:
    - Nest surveys should be completed in units with suspected WGS presence before implementation. Consult with CRGNSA Wildlife Biologist prior to implementation.
    - All nest trees will be flagged with "DO NOT CUT" tape and retained during project implementation.
    - If canopy cover around an identified nest tree is less than 40%, no project activities may occur within 25 feet of the nest tree that reduce canopy. Understory vegetation management and removal may occur within 25 feet of a nest tree.
- The following timing restrictions apply only if nests are identified within units prior to or during implementation. During the timing restrictions, thinning is prohibited within ¼ mile of the nest tree unless authorized by the CRGNSA Wildlife Biologist:
    - Bald eagle – February 1 to July 31.
    - Northern goshawk – March 1 to August 31.
- In order to ensure available habitat for Townsend's big-eared bat, Pallid bat, Fringed myotis, and Little brown myotis:
    - Existing snags shall be retained unless felling is necessary to address a safety hazard.
    - If snags are felled, they should remain on site when consistent with public and worker safety to provide habitat diversity.
- Retention of large, downed wood and large boulders is recommended to provide habitat for the California mountain kingsnake.

Scenery

- For preservation of scenery at middleground and background distances:
    - Tree removal along treatment areas edges will create a natural appearing, feathered, or scalloped edge, to avoid uniform straight lines. Such edges integrate skips, follow natural contours, preserve a 50–100-foot buffer of shorter vegetation, or can gradually feather density into the nontreatment area.
- For preservation of scenery at foreground distance:
    - Slash piles within foreground of KVAs should be burned within three years after treatment, subject to applicable fire restrictions, smoke-management requirements, air-quality requirements, and safe operating conditions. Other slash piles should be burned within three years after treatment, or as soon as practicable when safe and authorized conditions return. Minimize damage to residual trees and vegetation, especially to live and large diameter trees.
    - Down wood will be scattered in irregular patterns, providing visual variety that is not uniformly distributed.

Cultural

- If cultural resources are discovered during implementation, all work in the vicinity of the discovery shall cease and the CRGNSA Heritage staff will be notified.
- CRGNSA Heritage staff will be consulted prior to implementation to define avoidance areas. If and when needed, Heritage staff can provide in-field monitoring to ensure defined avoidances are met.

Recreation

- Temporary closures, warning signs, public notifications, or traffic-control measures shall be used where necessary to protect public safety during felling, mechanical operations, pile burning, snag creation, or other potentially hazardous activities.

Land Use Designation

Finding: The proposed action will occur in the following land use designations: SMA Agriculture, SMA Forest, SMA Open Space, and SMA Recreation.

The project proposal could be considered a resource enhancement project or a forest practice under the Management Plan. The Management Plan defines SMA Forest Practices as "Any activity conducted on or directly pertaining to forested land and relating to forest ecosystem management including but not limited to growing, thinning, or removing live or dead forest tree or shrub species, road and trail construction, reforestation, fertilizing, brush control, prevention of wildfire, and suppression of diseases and insects." The activities included in the project proposal—thinning, tree release, pile burning—are all included within this definition. Forest Practices are an allowable review use in all SMA land use designations except SMA Open Space.

The Management Plan does not define "Resource Enhancement Projects" in the guidelines or the glossary. The guidelines for Resource Enhancement Projects simply state that "Applications for resource enhancement projects must describe the goals and benefits of the proposed enhancement project. They must also thoroughly document the condition of the resource before and after the proposed enhancement project." In addition, Management Plan Part III, Chapter 4: Enhancement Strategies – Natural Resource Enhancement Strategy 2.H states that "the use of forest management and fire, as appropriate, to restore and perpetuate natural ecosystems [is encouraged]." The activities included in the project proposal—thinning, tree release, pile burning—are all included within this broad definition of resource enhancement, and are also broadly considered in the Natural Resource Enhancement Strategy.

Resource enhancement projects are an allowable review use in all land use designations. In SMA Open Space, Review Use 2.B states that resource enhancement projects "may include vegetation management and forest practices (subject to the forest practice guidelines of Part II, Chapter 2: Forest Land) for the restoration of forest health." Because the review use in SMA Open Space specifically incorporates the forest practice guidelines, all proposed forest management activities are allowable under both the Forest Practice and the Resource Enhancement guidelines, in all land use designations. The project will be reviewed for consistency with the specific guidelines for each review use under the Management Plan.

Resource Enhancement Project Guidelines

1. Applications for resource enhancement projects must describe the goals and benefits of the proposed enhancement project. They must also thoroughly document the condition of the resource before and after the proposed enhancement project. Applicants shall seek technical assistance from federal, state or county technical experts for assistance in designing voluntary wetland, stream, habitat, plant, and scenic enhancement projects.

Finding: The application for the project described the goals and benefits of the proposed enhancement as improving forest health, ecosystem resilience, and wildlife habitat while also reducing the risk of impacts from wildfire to communities adjacent to NFS lands. The application documented the condition of the resource before the project, noting increased stress and mortality for Douglas-fir, ponderosa pine, and Oregon white oak. The application states that the condition of the resource after the project will result in improved growing conditions, increased resilience to stressors, and reduced risk of uncharacteristic wildfire. The Forest Service is the technical expert for designing enhancement projects and does not need to seek technical assistance. This guideline is met.

Finding: Resource Enhancement Project Guideline 2 only applies to quarry enhancement projects. Guidelines 3-5 only apply to enhancement of water resources. The proposed action does not include quarry enhancement or water resource enhancement. Therefore, Guidelines 2-5 do not apply.

SMA Forest Practice Guidelines

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:

> X. Forest practices in accordance with an approved forest practices application (see application requirements) and subject to the additional guidelines in this chapter.
>
> > (1) The following information, in addition to general site plan requirements (see Part II, Chapter 7: General Policies and Guidelines) shall be required:
> >
> > > (a) Delineate the following on a recent aerial photo or detailed map:
> > >
> > > > (i) The size, shape, and exact location of the proposed treatment area including any clumps of leave trees to remain. If more than one silvicultural prescription is to be used, code each on the photo.
> > > >
> > > > (ii) Other important natural features of the subject parcel such as steep areas, streams, wetlands, rock outcrops, etc.
> > > >
> > > > (iii) Road and structure construction or reconstruction location.
> > > >
> > > > (iv) Location of proposed rock or aggregate sources.
> > > >
> > > > (v) Major skid trails, landings, and yarding corridors.
> > > >
> > > > (vi) Commercial firewood cutting areas.

(vii) Protection measures for scenic, cultural, natural, and recreation resources, such as road closures.

(b) Describe the existing forest in terms of species, ages, sizes, landscape pattern (including how it fits into the surrounding landscape pattern) and canopy closure for all canopy layers.

(c) Describe how the forest practice will fit into the existing landscape pattern and how it will meet scenic and natural resource standards in Review Uses 1.X(4)(a-g) and1.X(5)(a-d).

(d) Written silvicultural prescriptions with projected post-treatment forest condition specified in terms of species, ages, sizes, landscape pattern (including how it fits into the surrounding landscape pattern) and canopy closure for all canopy layers.

(e) Road and structure construction or reconstruction design.

(f) Existing and proposed rock pit development plans.

(g) A discussion of slash disposal methods.

(h) A reforestation plan as reviewed by the appropriate state forest practices agency.

Finding: The project covers multiple Forest Service properties. One isolated property is located near Drano Lake, adjacent to lands treated to improve wildlife habitat and forest resilience under CD-21-04 (Drano Stand and Wildlife Habitat Improvement). The remaining properties are located in the Catherine and Major Creek watersheds. A map was provided showing the full project area delineated by vegetation type, and specific areas at a smaller scale delineated by vegetation type. No road or structure construction is proposed. No rock or aggregate sources are proposed. No skid trails, landings, or yarding corridors are proposed. No commercial firewood cutting areas are proposed. Protection measures for resource protection are covered in this Consistency Determination. Slash will be disposed of through chipping, lopping and scattering, and piling and pile burning. No reforestation plan is required because the CRGNSA is the action agency and because stands are being thinned for forest health.

Field observations in the project area showed an overwhelming need for treatments to reduce stand densities, improve forest health, and increase forest resilience. Across all vegetation types, the prevalence of shade intolerant tree species, e.g. Ponderosa pine and Oregon white oak, and encroachment by conifer species indicate that these ecosystems have departed from their historic fire regime. Stands in the project area appear to be moving out of stand initiation and into stem exclusion, showing that these

forests have been without fire for a very long time. The absence of coarse down wood, cavity-bearing oaks, and other wildlife features throughout these stands is another indicator of the disruption to the historic mixed-intensity fire regime of the landscape. From these observations, and due to fire suppression policies over the past 120 years, it is clear that management of these stands is necessary for restoration and retention of these forests.

By reducing the number of small diameter stems per acre of overtopped and intermediate crown class trees, i.e. thinning from below, treatments will mimic low to moderate fire intensity and will make these forests healthier and more fire resilient. Select tree release will target priority species, including Oregon white oak, Ponderosa pine, Quaking aspen, White alder and remnant Douglas-fir to increase vigor and longevity of these species. Allowing more sunlight to reach the forest floor by removing small diameter trees will increase understory biodiversity by increasing abundance of shrubs, forbs and grasses. As required by the Management Plan, crown cover and number and size of openings will be minimally changed by the removal of small diameter overtopped and intermediate crown class trees. Additionally, crown cover will grow back in to restore previous canopy cover. Snags and coarse down wood will be mechanically created where needed to meet Management Plan standards, but an overall increase in snags and down wood will naturally occur in units that receive thinning treatments. Portions of planning units as well as whole planning units will remain untreated because of the breadth of this project, based on evaluations by CRGNSA staff prior to implementation. This will also create a more variable stand structure to better represent landscape conditions existing prior to fire suppression land management policies.

(2) As part of the application, flag, stake or mark buffers, any trees or downed wood to be retained or removed (whichever makes the most sense), and areas for placing fill or removing material in preparation for a field visit by the reviewer.

Finding: The Forest Service is the reviewing agency. CRGNSA staff have conducted several site visits to review proposed actions. This guideline is met.

(3) Stewardship Plan Requirements: The following information, in addition to the applicable portions of the forest practice application requirements above and general site plan requirements (see Part II, Chapter 7: General Policies and Guidelines) shall be provided:

(a) Outline the long-term goals, proposed operations, and future sustainability of the subject parcel.

(b) Describe the time frame and steps planned to reach the long-term goals.

(c) For Forest Practices, describe how the proposed activities fit into the long-term goals and sustainability of the parcel and forest health. The following shall be addressed:

(i) Describe the range of natural conditions expected in the forest in terms of tree species, structure, and landscape pattern.

(ii) Describe what the resulting tree species, structure, and landscape pattern will be after the proposed activities.

(iii) Give a clear explanation of how a deviation from the applicable guidelines may better achieve forest health objectives.

(iv) Give a clear explanation of how and why the proposed activities will move the forest towards its range of natural variability and result in reaching sustainability, resiliency to disturbances.

(d) For clearing trees for new agricultural use, the following shall be addressed in addition to X(3)(a) and (b)above:

(i) Submit NRCS soil unit description and map for each soil unit affected by the proposed clearing or treatment.

(ii) Based on the needs of the operation, give a clear explanation as to the exact size of the clearing needed and how it will meet the natural and scenic requirements set forth in W(4)(a-d) in this chapter.

(iii) Describe in sufficient detail for evaluation the proposed agricultural use, the improvements needed on the parcel, timeline for its establishment, and its marketability.

(iv) Show evidence that an agricultural specialist, such as the county extension agent, has examined and found the proposed agricultural use reasonable and viable.

Finding: The purpose and need of the project is to improve forest health, ecosystem resilience, and wildlife habitat while also reducing the risk of negative impacts from wildfire to Forest Service-adjacent communities. Because the purpose of the project is long-term stewardship, the silvicultural recommendations described in the Project Proposal and in the findings for Guideline 1.X(1) show consistency with this guideline.

No agricultural uses are proposed, Guideline 1.X(3)(d) does not apply. This guideline is met.

(4) For forest practices, the following scenic resource guidelines shall apply: (See Scenic Resources section)

(5) Forest practices shall maintain the following in addition to applicable natural resources guidelines in Part I, Chapter 4, SMA Natural Resources: (See Natural Resources section)

Finding: The scenic and natural resource guidelines for forest practices are included below in the relevant sections.

Scenery

SMA Design Guidelines Based on Landscape Settings

Finding: The site is within the Oak Woodland and Gorge Walls, Canyons, and Wildlands Landscape Settings.

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.

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

(1) Structures, including signs, shall have a rustic appearance, use nonreflective 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 proposed development does not include new structures. Project Design Criteria include seeding after project implementation with native plant species.

Overall, conditions of approval for scenic resources require retention of the overall visual character of vegetation within the natural appearing landscape and assessment and treatment of any visual impacts of the intervention itself such as saw

cuts, stumps, piles, canopy loss, created openings, and visible contrast between treated and untreated areas. Visual character retention is addressed in this section and is required regardless of visibility from a KVA. Analysis related to visual impacts of the intervention is discussed in SMA Guidelines for Development and Uses Visible from KVAs as these impacts are evaluated at several viewing distances, defined by distance from the KVA.

Scenic impacts from proposed actions include stumps, piles, downed wood, canopy loss, created openings, and the contrast of treatment areas adjacent to untreated areas. Because the proposed actions are limited to vegetation modification and removal, the vegetation component for each natural appearing landscapes as defined in the National Scenic Area Management Plan is utilized as the desired condition for review.

SMA Landscape Setting	*Vegetation Character Description from the Management Plan*
Gorge Walls, Canyonlands, and Wildlands	**Often includes large, old fir, pine and maple trees that can connect to narrow bands of lush, riparian vegetation.**
Oak-Pine Woodland	**The vegetation component is highly varied. Mixed stands of Oregon white oak and ponderosa pine are typical. Note that drier portions of this setting may transition into grassland, appearing as treeless prairies, or "biscuit scablands" a special and unique landscape resulting from scouring of great floods.**

These landscapes have departed from the historic condition with increased stand density and the exclusion of Oregon white oak and Ponderosa pine. Proposed treatments will reduce stand density, enhancing resilience by more closely aligning with historic conditions and mimicking the impacts of disturbance regimes that included frequent, mixed-intensity fires.

Removing small diameter conifers will retain existing upper canopy cover and retain the key forest structures for all viewing distances. The decreased stand density may enhance visibility of the large, mature trees historically characteristic to the Gorge ecosystems.

According to the CRGNSA Management Plan's Desired Forest Structure and Pattern Table, the west conifer vegetation type allows openings with 15-40% canopy closure, the east conifer vegetation type allows openings with 0-40% canopy closures, and the ponderosa pine/Oregon oak vegetation type allows openings with 0-25% canopy closure. There is a 1-acre size restriction on all openings. Given that tree removal will focus on encroaching small diameter conifer or on reducing

density in stands, anticipated loss to canopy closure is minimal and is unlikely to be visible. Remaining mature or large overstory tree canopy will rebound, closing any canopy openings.

The proposed forest practice will retain and restore scenic Landscape Settings characteristics. This guideline 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 project area for the proposed action includes lands more than 11 miles apart, intermittently visible from multiple Key Viewing Areas. CRGNSA staff evaluated the visibility of project areas located near Drano Lake, between Burdoin Mountain and Catherine Creek, and along Major Creek.

Lands near Drano Lake

KVA	FOREGROUND	MIDDLEGROUND	BACKGROUND
Cook Underwood Road	X	X	
Columbia River	X	X	
WA State Route 14		X	
Interstate 84		X	
HRCH		X	
Dog Mountain Trail		X	
WA State Route 141			X
OR Highway 35			X
Panorama Point			X

Lands between Burdoin Mountain and Catherine Creek

KVA	FOREGROUND	MIDDLEGROUND	BACKGROUND
Columbia River		X	X
WA State Route 14		X	X
Old Highway 8		X	X
Interstate 84		X	X
HRCH		X	X
Dog Mountain Trail			X
Rowena Crest and Tom McCall Point			X
WA State Route 142			X

Lands along Major Creek

KVA	FOREGROUND	MIDDLEGROUND	BACKGROUND
WA State Route 14		X	X
Old Highway 8		X	X
Columbia River		X	X
Interstate 84		X	X
HCRH		X	X
Dog Mountain Trail			X
Rowena Crest and Tom McCall Point			X
WA State Route 142			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 landscape is topographically visible from several Key Viewing Areas at middleground and background distances. The lands near Drano Lake are also visible in the foreground of two KVAs. Visual impacts reviewed include the intervention itself such as

saw cuts, stumps, piles, canopy loss, created openings, and visible contrast between treated and untreated areas.

Not all potential impacts are visible at every sight distance. For example, visible impacts of a stump cut with saws, as compared with stumps left from natural causes, will not be visible at middleground (0.5 to 4 miles) or background distances (4 miles to the horizon) but could be visible in the foreground (up to 0.5 miles) of key viewing areas, trails, or roads.

Potential visible impacts at middleground and background distances could result from created openings and visible contrast between treated and untreated areas. Impacts at foreground distances could result from visible saw cuts, piles, stumps, tree marking, or survey flagging.

Project Design Criteria were developed to minimize impacts to scenic resources based on viewing distance to Key Viewing Areas. No impacts are anticipated from thinning and select tree release due to overstory retention. Short-term impacts may result from treatment within KVA foregrounds, but no work is proposed immediately adjacent to those KVAs and the work is not anticipated to be visible to the casual observer from those KVAs. Long-term scenic integrity is maintained or improved with treatment following the Project Design Criteria. Therefore, the project will have no adverse effect to scenic resources.

CRGNSA staff have conducted various fuels and invasive species treatments within the project area in the last decade. Additionally, various fires and associated suppression activities have occurred within the project area, most recent being the 2025 Burdoin Fire. CRGNSA staff have records of these activities and can reference those records prior to project initiation. Further, project implementation will take on-the-ground conditions into account, allowing CRGNSA staff to limit project activities within areas where additional disturbance could cause adverse effects to scenic resources. Because there are no adverse effects to scenic resources from the project, there are no adverse cumulative effects. This guideline is met.

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: Treatment will occur in a variety of landscape settings and land use designations. To ensure consistency across the project area, treatment impacts will be assessed at the scenic 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.

Finding: Application of the Project Design Criteria and the Desired Forest Structure guidelines ensures that the project blends with the natural landscape within and adjacent to the project area. This guideline is met.

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 action is a resource enhancement through forest practices. The project must be sited on the landscape in order to be effective. The project meets the standard of *Not Visually Evident* through application of Project Design Criteria to ensure that restoration activities are not visible to the casual observer. This guideline is 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: Findings in this section outline how this land use will meet scenic standards. Design criteria are inherently related to the visibility of the project from KVAs, requiring proportional criteria protecting scenic resources. 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: Consistency with the Cultural and Natural Resource guidelines is demonstrated below. 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: No development will be constructed, and therefore the development cannot protrude above the line of a bluff, cliff, or skyline. 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: No structures are proposed. This guideline does not apply.

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: No structures are proposed. This guideline does not apply.

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

Finding: No structures are proposed. This guideline does not apply.

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 buildings are proposed. This guideline does not apply.

SMA Guidelines for KVA Foregrounds and Scenic Routes

Finding: A portion of the project is within the foreground of the Cook Underwood Road and Columbia River KVAs.

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

Finding: The project is not immediately adjacent to any scenic routes. This guidelines 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.

Findings: Guidelines 2 and 3 apply to scenic highway corridor strategies. They do not apply to this project.

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: This guideline restricts consideration to the developed prism of KVAs. The proposed action occurs outside of developed areas and road right of ways; therefore, this guideline does 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: There are no project activities proposed within the right of way for the Historic Columbia River Highway or Interstate 84. 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: No road maintenance, warehouse, or stockpile areas are proposed. This guideline does not apply.

SMA Guidelines for Areas Not Visible from KVAs

Finding: The Consistency Determination presumes that all project areas are topographically visible from KVAs. Therefore, these guidelines do not apply.

SMA Forest Practice Guidelines for Scenic Resources

(4) For forest practices, the following scenic resource guidelines shall apply:

(a) Forest practices shall meet the design guidelines and scenic standards for the applicable landscape setting and zone (See Required SMA Scenic Standards table, SMA Guidelines for Development Visible from KVAs, SMA Scenic Resource Provisions, Part I, Chapter I).

Finding: Findings in this section outline how this forest practice will meet scenic standards. This guideline is met.

(b) In the western portion (to White Salmon River) of the SMA Coniferous Woodland Landscape Setting, no more than 8% of the composite KVA viewshed from which the forest practice is topographically visible shall be in created forest openings at one time. The viewshed boundaries shall be delineated by the Forest Service.

Finding: No created openings are anticipated due to retention of dominant overstory canopy. This guideline is met.

(c) In the western portion (to the White Salmon River) of the SMA Gorge Walls, Canyonlands, and Wildlands Landscape Setting, no more than 4% of the composite KVA viewshed from which the forest practice is topographically visible shall be in created forest openings at one time. The viewshed boundaries shall be delineated by the Forest Service.

Finding: No created openings are anticipated due to retention of dominant overstory canopy. This guideline is met.

(d) For all other landscape settings, created forest openings visible at one time shall be within the desired range for the vegetation type as set forth in Natural Resources guidelines in Review Uses 1.X(5)(a)- (c) in this chapter.

Finding: No created openings are anticipated due to retention of dominant overstory canopy. However, Project Design Criteria ensure that any created

openings will be evaluated to ensure they remain within the specified range of the composite landscape setting viewshed. This guideline is met.

(e) Size, shape, and dispersal of created forest openings shall maintain the desired natural patterns in the landscape as set forth in Natural Resources guidelines in Review Uses 1.X(5)(a)- (c) in this chapter.

Finding: No created openings are anticipated due to retention of dominant overstory canopy. However, Project Design Criteria ensure that the CRGNSA landscape architect will evaluate fuel prescriptions prior to implementation to ensure that treatments retain natural patterns of the landscape setting. These natural patterns may include edges that integrate skips, follow natural contours, preserve a 50–100-foot buffer of shorter vegetation, or gradually feather density into the nontreatment area. This guideline is met.

(f) The maximum size of any created forest opening is set forth by the "Desired" vegetation type in the Forest Structure and Pattern Table.

(i) If the treatment is proposed to go beyond the above guideline based on forest health or ecosystem function requirements, a Stewardship Plan shall be required.

(ii) If the Stewardship Plan proves that the above guideline is detrimental to either forest health or ecosystem function, the size of the created forest opening shall be within the natural range for the vegetation type as listed in the Desired Forest Structure and Pattern Table for each vegetation type, shall not mimic catastrophic fires, and shall maintain scenic standards.

Finding: No created openings are anticipated due to retention of dominant overstory canopy. This guideline is met.

(g) Created forest openings shall not create a break or opening in the vegetation in the skyline as viewed from KVAs.

Finding: No created openings are anticipated due to retention of dominant overstory canopy. This guideline is met.

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 for the proposed resource enhancement was prepared under Appendix B of the Programmatic Agreement between Washington DAHP and the Forest Service. The report was shared with the Tribes on June 12, 2026. No comments were received from the Tribes.

The inadvertent discovery procedure described above is included as a Project Design Criteria. 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: The CRGNSA Hydrologist determined that water resources within the project area are ephemeral and do not support fish habitat. The only identified water resource available as fish habitat is Major Creek, and that habitat only extends approximately .5 river miles up from the Columbia River. The proposed resource enhancement project will occur more than 2 river miles upstream of this habitat. Because no perennial fish habitat exists within the project area, a 50 foot buffer will be applied to all water resources, except that a 200 foot buffer applies to Major Creek which is perennial and non-fish bearing within the project area.

Project activities will be authorized within water resource buffers. No mitigation plan is required because the project is a resource enhancement project and is designed to have beneficial effects. See "Mitigation Plan" below.

B. When a buffer zone is disturbed by a new use, it shall be replanted with only native plant species of the Columbia River Gorge.

Finding: Project Design Criteria require repair and reseeding with native plant species, as determined by CRGNSA staff. This guideline is met.

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

Finding: All water resource buffers will be identified, approved, and flagged on the ground prior to implementing any project activities. This guideline is met.

D. Wetlands Boundaries shall be delineated using the following:

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

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

(3) The project applicant shall be responsible for determining the exact location of a wetlands boundary. 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: All wetland areas, vernal pools, and moist soil areas will be identified, mapped using GIS systems, and buffered on the ground prior to implementing any project activities. This guideline is met.

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: All streams, creeks, and ponds be identified, mapped using GIS systems, and buffered on the ground prior to implementing any project activities. This guideline is met.

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

Finding: The Forest Service is the action agency. 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: There is no practicable alternative to the project outside of water resource buffers, see "Practicable Alternative Test" section below. No mitigation plan is required because the project is a resource enhancement project and is designed to have beneficial effects. See "Mitigation Plan" below.

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: The project is a resource enhancement through forest practice activities. All project activities are authorized within water resource buffers and may affect natural resources. However, project activities were intentionally chosen to minimize adverse resource impacts and maximize beneficial resource impacts. Within water resources and their buffer zones, Project Design Criteria ensure that project activities will have no adverse resource impacts.

CRGNSA staff have conducted various fuels and invasive species treatments within the project area in the last decade. Additionally, various fires and associated suppression activities have occurred within the project area, most recent being the 2025 Burdoin Fire. CRGNSA staff have records of these activities and can reference those records prior to project initiation. Further, project implementation will take on-the-ground conditions into account, allowing CRGNSA staff to limit project activities within areas where additional disturbance could cause adverse effects to

water resources. Because there are no adverse effects to water resources from the project, there are no adverse cumulative effects. This guideline is met.

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: The CRGNSA Wildlife Biologist and Botanist reviewed the project area for occurrences of protected wildlife and plant sites and habitat and determined that review under this section is necessary. The CRGNSA Hydrologist determined that because the project occurs outside of known fish habitat, and because project activities will not have adverse effects to water quality, that no review under this section is necessary.

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: The Forest Service is the applicant. Appropriate site plans were developed and reviewed by CRGNSA resource specialists. 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 made the following determinations regarding wildlife species present in the project area or with habitat in the project area, based on their review of project activities and Project Design Criteria requiring timing or acreage restrictions for identified species, consultation when protected species are observed before or during project implementation, and the retention and creation of snag and down wood habitat:

- **The project will have no impacts to: yellow-billed cuckoo; streaked horned lark; wolverine; bald eagle; northwestern pond turtle; great blue heron; osprey; golden eagle; peregrine falcon; prairie falcon.**
- **The project will only have beneficial impacts to: Northern goshawk; lesser goldfinch; Western bumblebee; Johnson's hairstreak; Great Basin fritillary; shortface lanx; mule deer; pileated woodpecker; wild turkey.**
- **The project will overall have a beneficial impact, and may impact individuals or habitat but will not likely contribute to a trend towards federal listing or cause a loss of viability to the population or species: northern spotted owl; Western monarch butterfly; ash-throated flycatcher; purple martin; Lewis's woodpecker; acorn woodpecker; mountain quail; Townsend's big eared bat; little brown myotis; Western gray squirrel; fisher; California mountain kingsnake; Yuma skipper; Rocky Mountain duskysnail; shiny tightcoil; Dalles Hesperian; pristine springsnail.**
- **The project will not adversely affect any wildlife species or habitat.**

The CRGNSA Botanist reviewed available information on rare plant species and identified the following species as potentially existing within the project area:

Artemisia campestris ssp. borealis var. wormskioldii; Bolandra oregana; Carex proposita; Chrysolepis chrysophylla var. chrysophylla; Cirsium remotifolium; Collinsia sparsiflora var. bruceae; Corydalis aquae-gelidae; Cryptantha rostellata; Damasonium californicum; Dermatocarpon meiophyllizum; Diplacus cusickioides; Erigeron howellii; Erigeron oreganus; Erythranthe pulsiferae; Erythranthe washingtonensis ; Githopsis specularioides; Hackelia diffusa var. diffusa; Hedysarum occidentale; Heterotheca oregona; Isoetes nuttallii; Juncus howellii; Leptogium compactum; Leptosiphon bolanderi; Lomatium klickitatense; Lomatium laevigatum; Lycopodiella inundata; Meconella oregana; Montia diffusa; Oenothera caespitosa ssp. marginata; Ophioglossum pusillum; Orthocarpus bracteosus; Packera bolanderi var. harfordii; Penstemon barrettiae; Penstemon wilcoxii; Plectritis brachystemon; Polemonium carneum; Polystichum californicum; Ranunculus hebecarpus; Ranunculus populago; Ranunculus triternatus; Rorippa columbiae; Sabulina pusilla; Salix sessilifolia; Scouleria marginata; Scribneria bolanderi; Sericocarpus oregonensis var. oregonensis; Sericocarpus rigidus; Sisyrinchium sarmentosum; Spiranthes porrifolia; Sullivantia oregana; Utricularia intermedia; Waynea californica.

The CRGNSA Botanist determined that Project Design Criteria requiring project work to occur outside of seasonally wet areas, for slash piles to be constructed outside of seasonally wet areas, and for the Botanist to be engaged during project initiation and implementation to ensure avoidance of other rare plants, will result in no adverse effects to rare plants or habitat. Overall, the proposed action will have beneficial effects to rare plants as resource enhancement creates more favorable habitat to these endemic species.

CRGNSA staff have conducted various fuels and invasive species treatments within the project area in the last decade. Additionally, various fires and associated suppression activities have occurred within the project area, most recent being the 2025 Burdoin Fire. CRGNSA staff have records of these activities and can reference those records prior to project initiation. Further, project implementation will take on-the-ground conditions into account, allowing CRGNSA staff to limit project activities within areas where additional disturbance could cause adverse effects to wildlife or rare plants. Because there are no adverse effects to wildlife or rare plants from the project, there are no adverse cumulative effects. 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 resource specialists reviewed the project for impacts to wildlife and plant resources using the criteria described above. 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 project is within wildlife and plant habitats and cannot be moved without compromising the purpose of the project.

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: See the Practicable Alternative Test and Mitigation Plan 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.

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: CRGNSA resource specialists reviewed the project, not a local government. Guidelines G and H do 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: No revisions to a mitigation plan are required. This guideline does not apply.

4. Soil Productivity

A. Soil productivity shall be protected using the following guidelines:

(1) A description or illustration showing the mitigation measures to control soil erosion and stream sedimentation.

(2) New developments and land uses shall control all soil movement within the area shown on the site plan.

(3) The soil area disturbed by new development or land uses, except for new cultivation, shall not exceed 15 percent of the project area.

(4) Within 1 year of project completion, 80 percent of the project area with surface disturbance shall be established with effective native ground cover species or other soil-stabilizing methods to prevent soil erosion until the area has 80 percent vegetative cover.

Finding: Project Design Criteria include limiting use of off-road vehicles and reseeding disturbed areas with native seed mix, which will prevent soil erosion. Application of Project Design Criteria will ensure that there will be no measurable soil disturbance or erosion, and that soil productivity will be maintained. This guideline is met.

Practicable Alternative Test

1. An alternative site for a proposed use shall be considered practicable if it is available and the proposed use can be undertaken on that site after taking into consideration cost, technology, logistics, and overall project purposes.

Finding: The proposed use is a resource enhancement project. The project purposes cannot be met on an alternative site. Therefore, an alternative site is not practicable.

2. A practicable alternative does not exist if a project applicant satisfactorily demonstrates all of the following:

A. The basic purpose of the use cannot be reasonably accomplished using one or more other sites in the vicinity that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, or wildlife or plant areas or sites.

B. The basic purpose of the use cannot be reasonably accomplished by reducing its proposed size, scope, configuration, or density, or by changing the design of the use in a way that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, or wildlife or plant areas or sites.

C. Reasonable attempts were made to remove or accommodate constraints that caused a project applicant to reject alternatives to the proposed use. Such constraints include inadequate infrastructure, parcel size, and land use designations. If a land use designation or Recreation Intensity Class is a constraint, an applicant must request a Management Plan amendment to demonstrate that practicable alternatives do not exist.

Finding: The basic purpose of the project is resource enhancement through forest practice activities. The lands in need of resource enhancement must receive the treatment. Likewise, the basic purpose of the project cannot be completed at a smaller scale, scope, configuration, density, or with changes to project design. There are no constraints to the project that caused the CRGNSA to reject alternatives to the proposed resource enhancement project. A practicable alternative to the project does not exist.

Mitigation Plan

1. Mitigation Plans shall be prepared when:

A. The proposed development or use is within a buffer zone (wetlands, ponds, lakes, riparian areas, or wildlife or plant areas or sites).

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

Finding: The project occurs within water resource buffers, wildlife habitat, and rare plant areas. There is no practicable alternative. The project is a resource enhancement through forest practice activities. Project Design Criteria included in the project ensure that there are no adverse impacts to protected resources. Because there are no adverse impacts to protected resources from project activities, and because the purpose of the project is resource enhancement, a mitigation plan was not prepared for this project.

SMA Forest Practice Guidelines for Natural Resources

(5) Forest practices shall maintain the following in addition to applicable natural resources guidelines in Part I, Chapter 3, SMA Natural Resources:

(a) Silvicultural prescriptions shall maintain the desired natural forest stand structures (tree species, spacing, layering, and mixture of sizes) based on forest health and ecosystem function requirements. Forest tree stand structure shall meet the requirements listed in the Desired Forest Structure and Pattern Table for each vegetation type. Forest tree stand structure is defined as the general structure of the forest in each vegetation type within which is found forest openings.

Finding: The proposed action is to manage overstocking and fuel loading through forest practices, leading to enhancement of the resources in each vegetation type. Forest tree stand structure shall meet the requirements listed in the Desired Forest Structure table. This guideline is met.

(b) Created forest openings shall be designed as mosaics not to exceed the limits defined as Desired in the Desired Forest Structure and Pattern Table unless proposed as a deviation as allowed under the scenic resource guideline in Review Uses1.X(4)(f).

Finding: No created forest openings are proposed. If forest openings are proposed during implementation, the CRGNSA Landscape Architect will be consulted to ensure consistency with the limits described in the Desired Forest Structure and Pattern Table. No deviations from those limits are proposed or considered. This guideline is met.

(c) Snag and down wood requirements shall be maintained or created as listed in the Desired Forest Structure and Pattern Table for each vegetation type.

Finding: Existing snags and downed wood shall be maintained. Where feasible, snags and downed wood will be created up to the standard for each vegetation type. This guideline is met.

(d) If the treatment is proposed to deviate from the snag and down wood requirements based on forest health or ecosystem function requirements, a Stewardship Plan shall be required and shall demonstrate why a deviation from the snag and down wood requirements is required.

Finding: No deviation from the snag and down wood requirements is proposed. This guideline does not apply.

Desired Forest Structure Table (West Conifer)

CATEGORY	MP REQUIREMENTS	PROPOSED	FINDING
Forest Structure (Average % total canopy closure (cc))	60-80% canopy closure, Understory layer variable (0-60% of total cc)	**No changes to canopy closure proposed.**	**Consistent**
Forest Openings	Retain forested character. Allow openings up to 15 acres (up to 5 acres in the foreground of KVAs) Openings retain 15-40% canopy closure	**No openings proposed.**	**Consistent**
Leave Trees	Leave 15% of existing tress per acre throughout opening and in clumps Include 3 trees per acre of the largest size trees available (Includes all available remnant old forest)	**No openings are proposed. Project may only remove trees above 10" dbh to release identified large diameter trees; as such, all of the largest trees will be retained.**	**Consistent**
Average Down Wood (per acre)	18- 25 pieces greater than 20" dbh and at least 30 feet long, scattered	**Average down wood of this size will be evaluated during implementation; if possible, down wood will be added to meet average. No down wood will be removed.**	**Consistent**
Average Snags (per acre, conifers, 20-40ft in height)	10 snags at 10"-20" dbh, and 7 snags greater than 20" dbh	**Average number of snags will be evaluated during implementation; if possible, snags will be added to meet average. No snags will be removed.**	**Consistent**

Desired Forest Structure Table (East Conifer)

CATEGORY	MP REQUIREMENTS	PROPOSED	FINDING
Forest Structure (Average % total canopy closure (cc))	40-80% canopy closure. Understory layer less than 25% of total cc	**No changes to canopy closure proposed.**	**Consistent**
Forest Openings	Openings less than 1 acres. Openings have 0-40% canopy closure. Openings widely dispersed.	**No openings proposed.**	**Consistent**
Leave Trees	None required	**N/A**	**N/A**
Average Down Wood (per acre)	3-6 pieces greater than 20" dbh and at least 30 feet long, scattered	**Average down wood of this size will be evaluated during implementation; if possible, down wood will be added to meet average. No down wood will be removed.**	**Consistent**
Average Snags (per acre, conifers, 20-40ft in height)	5 snags at 10"-20" dbh, and 3 snags greater than 20" dbh	**Average number of snags will be evaluated during implementation; if possible, snags will be added to meet average. No snags will be removed.**	**Consistent**

Desired Forest Structure Table (Ponderosa Pine/Oregon Oak)

CATEGORY	MP REQUIREMENTS	PROPOSED	FINDING
Forest Structure (Average % total canopy closure (cc))	60-80% canopy closure, Understory layer variable (0-60% of total cc)	**No changes to canopy closure proposed.**	**Consistent**
Forest Openings	Retain forested character. Allow openings up to 15 acres (up to 5 acres in the foreground of KVAs) Openings retain 15-40% canopy closure	**No openings proposed.**	**Consistent**
Leave Trees	None required	**N/A**	**N/A**
Average Down Wood (per acre)	1-3 pieces greater than 20" dbh and at least 30 feet long, scattered	**Average down wood of this size will be evaluated during implementation; if possible, down wood will be added to meet average. No down wood will be removed.**	**Consistent**
Average Snags (per acre, conifers, 20-40ft in height)	5 snags at 10"-20" dbh, and 3 snags greater than 20" dbh. Oak snags can be counted if already dead or partially dead.	**Average number of snags will be evaluated during implementation; if possible, snags will be added to meet average. No snags will be removed.**	**Consistent**

Recreation

SMA Guidelines

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

Finding: The proposed resource enhancement project may displace developed and dispersed recreational uses on National Forest System lands due to necessary closures for safety during project implementation and temporary effects that will disappear as the landscape regrows after project implementation. This displacement will be temporary and will not have long-term effects to the public's ability to recreation on NFS lands. The project does 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 Management Plan defines *recreation resources* as "Areas and facilities that provide recreation opportunities and experiences. Recreation resources include semi-primitive areas with few facilities and developed sites." Recreation resources in the vicinity of the proposed project include several hiking, mountain biking, and equestrian trails around Coyote Wall, Burdoin Mountain, and Catherine Creek. The proposed actions may temporarily affect the recreation experience, either through necessary closures during project implementation, or through public observation of project effects during and after implementation. However, the proposed project will have no permanent adverse impacts on recreation resources because the project is a resource enhancement project limited to minor forest practice activities. These activities will not be evident on the landscape after implementation, due to active landscape restoration as well as natural revegetation. Implementation across the project area will not occur all at once, and any impacts to recreation resources will be separated over time, further limiting their effects. Therefore, there will be no adverse effects to recreation resources.

CRGNSA staff have conducted various fuels and invasive species treatments within the project area in the last decade. Additionally, various fires and associated suppression activities have occurred within the project area, most recent being the 2025 Burdoin Fire. CRGNSA staff have records of these activities and can reference those records prior to project initiation. Further, project implementation will take on-the-ground conditions into account, allowing CRGNSA staff to limit project activities within areas where additional disturbance could cause adverse effects to recreation resources. Because there are no adverse effects to recreation resources from the project, there are no adverse cumulative effects. This guideline is met.

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

Finding: This guideline does not apply.

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

Finding: Project Design Criteria ensure that the project will have no adverse effects to recreation resources. Because there are no adverse effects to recreation resources, no mitigation measures are necessary. This guideline is met.

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

Finding: This guideline does not apply.

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

Finding: 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: 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: This guideline does not apply.

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

Finding: The Recreation Intensity Classes only apply to recreation developments. The proposed action is not a recreation development. The RICs and associated guidelines do not apply.

Conclusion

The proposed resource enhancement project through forest practice activities is consistent with the National Scenic Area Management Plan Policy and Guidelines provided the project meets the criteria and conditions listed in the Findings of Fact and Consistency Determination.

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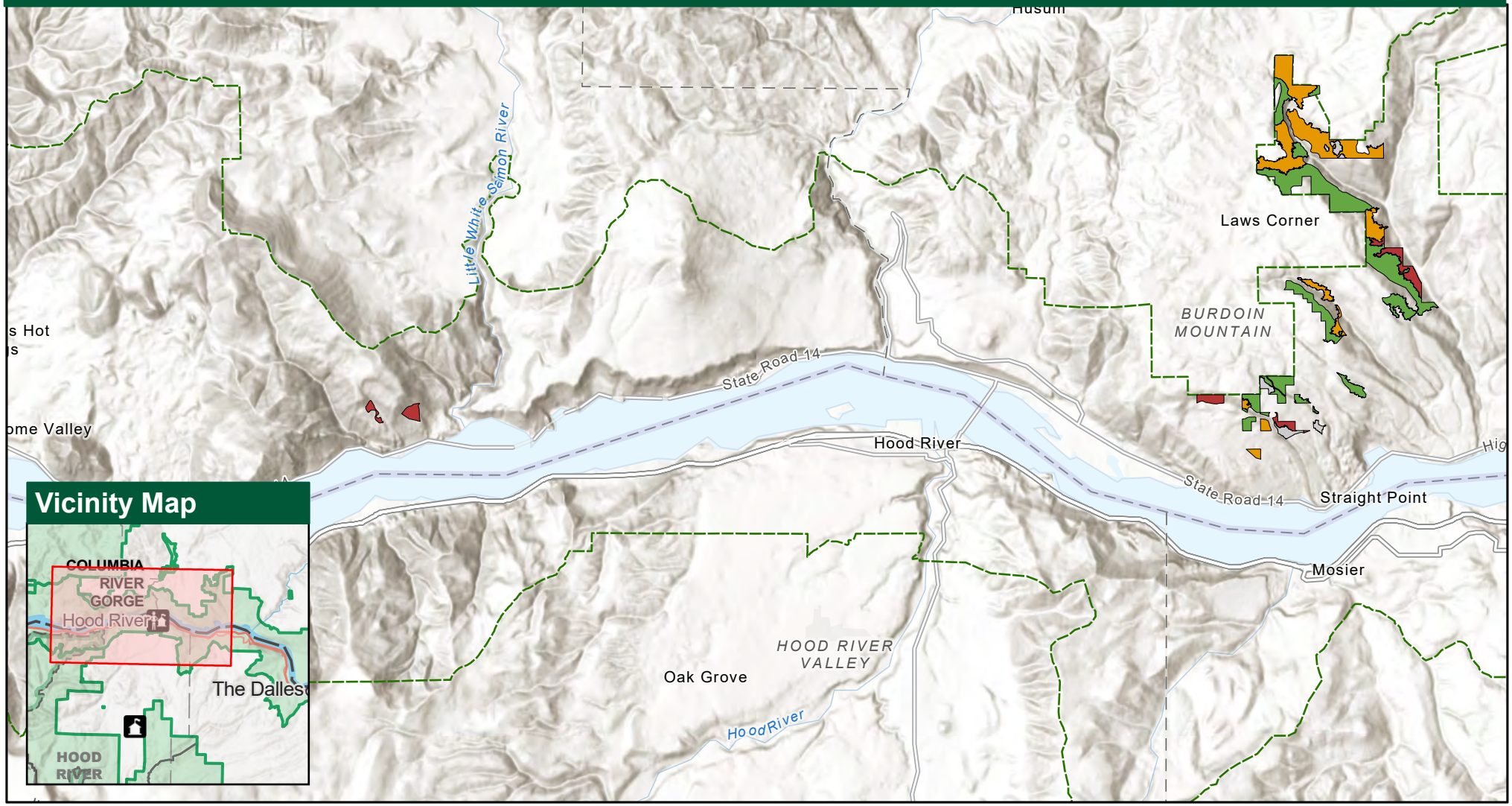
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Columbia River Gorge National Scenic Area

CD-26-03-S Washington Eastside Forest Health and Resilience

Full Project Area



N

0 7 Miles

WGS 1984 Web Mercator Auxiliary Sphere
Data Sources: USDA Forest Service
5/22/2026

LEGEND

- Conifer
- Conifer/Hardwood
- Grassland
- Hardwood

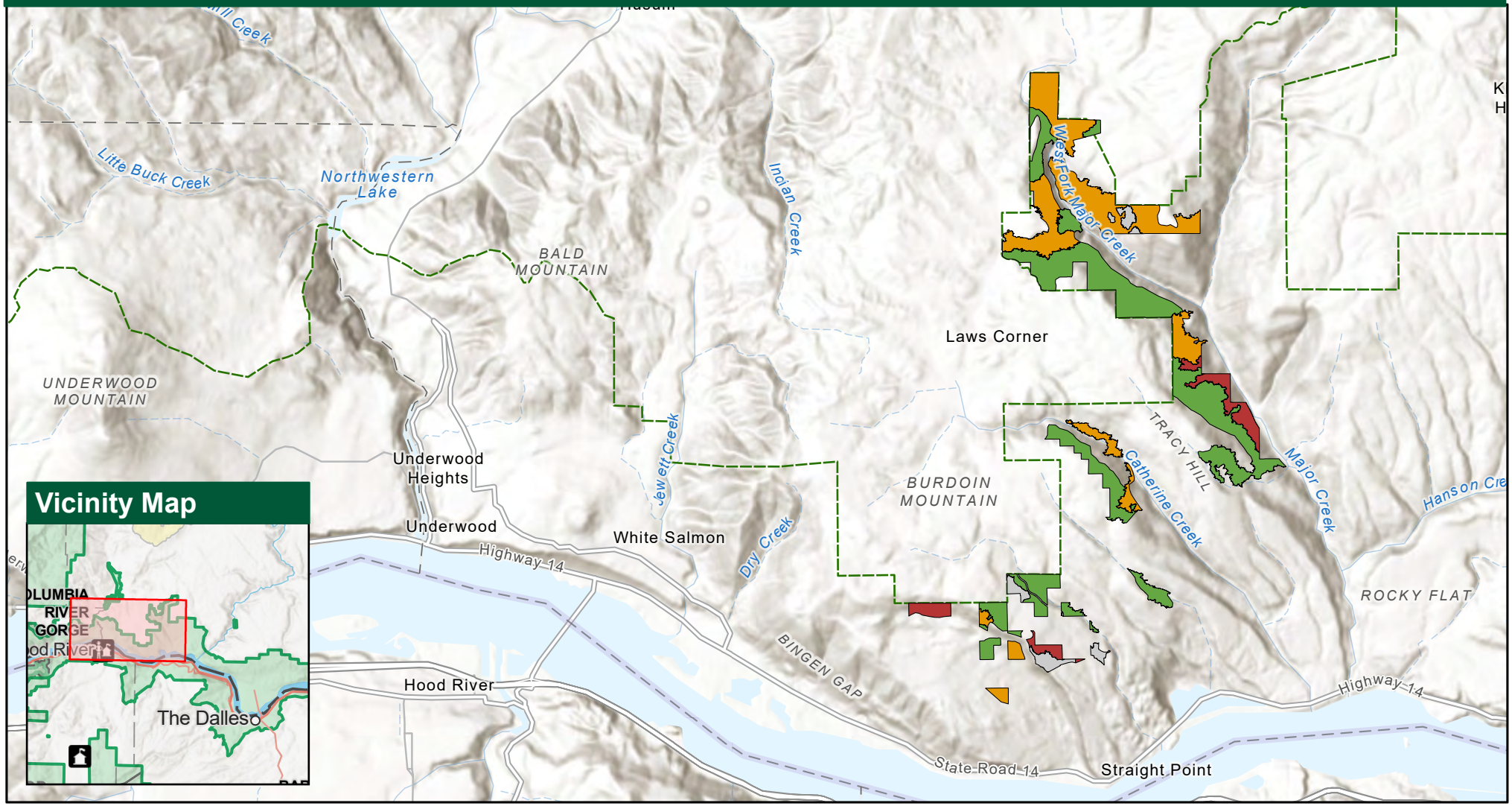
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Columbia River Gorge National Scenic Area

CD-26-03-S Washington Eastside Forest Health and Resilience

Vicinity of Major Creek and Catherine Creek



N

0 4 Miles

WGS 1984 Web Mercator Auxiliary Sphere
Data Sources: USDA Forest Service
5/22/2026

LEGEND

- Conifer
- Conifer/Hardwood
- Grassland
- Hardwood

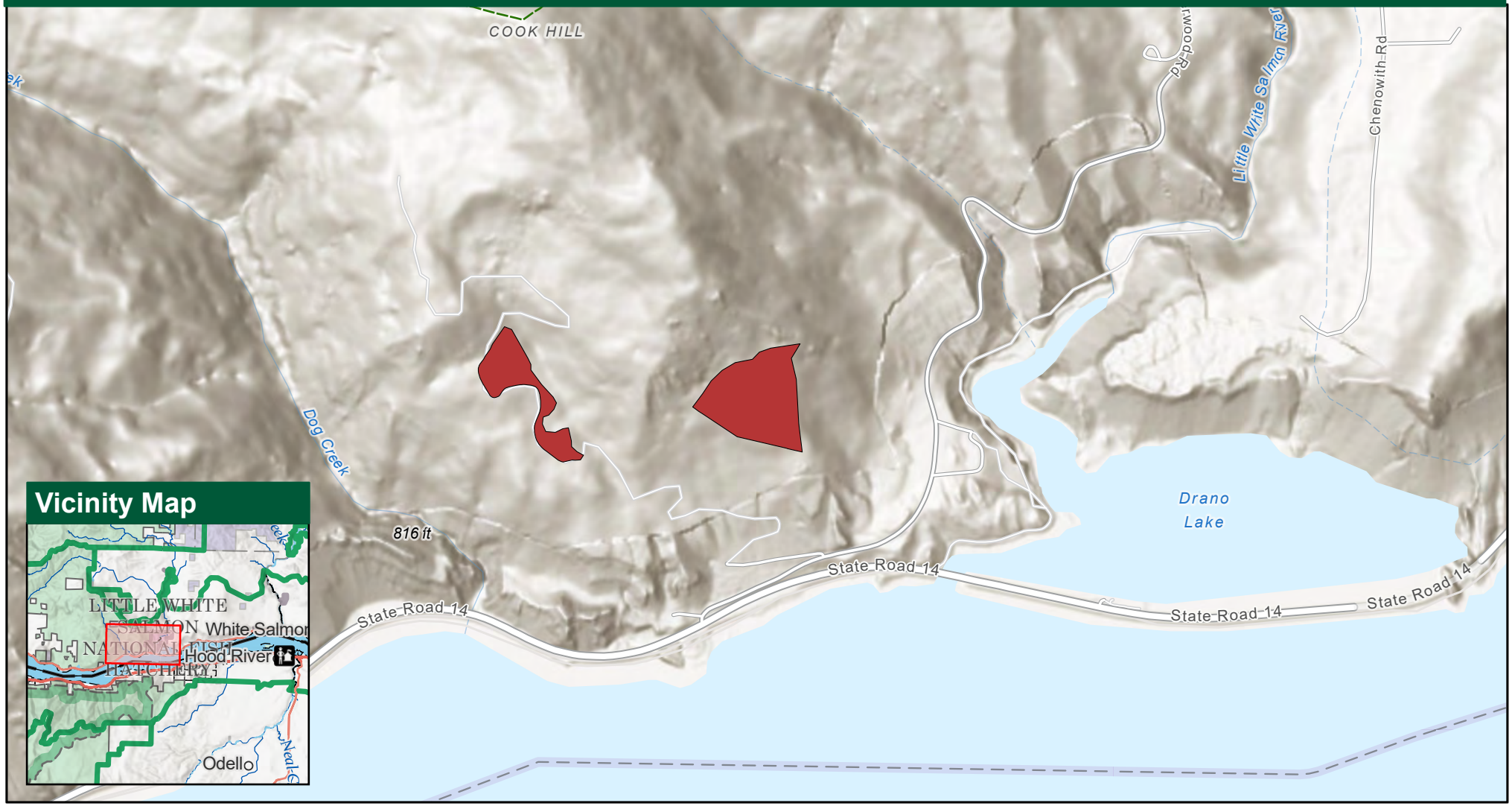
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Columbia River Gorge National Scenic Area

CD-26-03-S Washington Eastside Forest Health and Resilience

Vicinity of Drano Lake



Vicinity Map

N

0 1 Miles

WGS 1984 Web Mercator Auxiliary Sphere
Data Sources: USDA Forest Service
5/22/2026

LEGEND

- Conifer
- Conifer/Hardwood
- Grassland
- Hardwood

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