



TO: Columbia River Gorge Commission
FROM: Renee Tkach, Friends of the Columbia Gorge
RE: Friends comments on draft Recreation Chapter Revisions
DATE: May 11, 2020

Friends of the Columbia Gorge (Friends) would like to thank the Gorge Commission and Forest Service staff for their work in drafting the revisions for Chapter 4, the Recreation Resource section of the Management Plan. Friends is encouraged to see that public comments over the last couple of years were considered while drafting the revisions, such as:

- Provide trails linking Urban Areas and the Portland/Vancouver metropolitan area to recreation opportunities in the Scenic Area
- Establish a loop trail around the Scenic Area
- Provide safe pedestrian and bicycle passage across the three Columbia River bridges in the Scenic Area to connect scenic travel corridors for these user groups

The Gorge Commission stated at the beginning of the plan review process that recreation would be a primary focus of the review process due to congestion issues as well as missed opportunities to improve recreation experiences. While many of the policy revisions modernize the Management Plan, the policy changes do not address any of the larger recreation issues people are most concerned such as congestion, traffic and lack of dispersal strategies. Approving the draft revisions as-is misses the mark and falls short of what commissioners and the public said they wanted to see.

What is needed is a comprehensive Gorge-wide recreation plan that addresses these issues. However, the policies in the recreation section do not constitute a comprehensive plan for recreation and without it these problems will continue to grow. Friends believes the Commission and Forest Service should include a mandate for the completion of a recreation plan created by land managers and stakeholders to holistically address the recreation concerns that exist throughout the Gorge. The plan could consider innovations like the permit system at Dog Mountain to help relieve congestion at other overcrowded sites in the Gorge.

In addition to supporting a Management Plan revision requiring a comprehensive recreation plan, Friends offers the following revisions:

Under TRAILS AND PATHWAYS, GMA Objectives

Page 13 of 38 in the staff revisions .pdf

Section 1-4-13

Staff revisions call for keeping the following objectives:

2. Provide trails linking Urban Areas and the Portland/Vancouver metropolitan area to recreation opportunities in the Scenic Area.

3. Establish a loop trail around the Scenic Area.

Recommendation: Combine the two into one objective reading:

2. Provide trails linking Urban Areas and the Portland/Vancouver metropolitan area to expand recreation opportunities and establish a loop trail around the Scenic Area.

Rationale: Combining the two objectives that share the goal of connectivity makes sense as communities work to connect to one another through trail systems.

Staff revisions call for eliminating the following objective:

~~D. Provide trail linkages between Scenic Area trail opportunities and trails in the National Forests and other public lands north and south of the Scenic Area.~~

Recommendation: Keep objective as is:

D. Provide trail linkages between Scenic Area trail opportunities and trails in the National Forests and other public lands north and south of the Scenic Area.

Rationale: The Scenic Area is inextricably linked to public and conserved lands adjacent to its boundary and removing this objective lowers the possibilities of significant trail systems in the future. In addition, as natural disasters can impact current trail connections that run both in and outside the boundary of the Scenic Area, Friends has concerns that elimination of this objective can impede future reconnection efforts. We would like more clarity on the necessity of eliminating this objective.

Under TRAILS AND PATHWAYS, GMA Policies

Page 14 of 38 in the staff revisions .pdf

Section 1-4-14

Staff revisions call for eliminating the following objective:

~~8. Priority shall be given to the completion and improvement of existing trails, incomplete trail loops, and trail segments, considering relationships with trails in Urban Areas, the SMA, and outside the Scenic Area.~~

Recommendation: Keep objective as is:

8. Priority shall be given to the completion and improvement of existing trails, incomplete trail loops, and trail segments, considering relationships with trails in Urban Areas, the SMA, and outside the Scenic Area.

Rationale: Completing and improving existing trails, completing incomplete trail loops and segments should remain a priority in the Scenic Area and remains a priority among the agencies' trail steward partner groups.

Under GMA Guidelines, Allowables Uses, Approval Criteria for Recreation Uses

Page 26 of 38 in the staff revisions .pdf

Section 1-4-26

Staff revisions call for the following new objective:

~~D (3) Applications for new trails or trailheads shall address and minimize the potential spread of noxious weeds.~~

Recommendation: Reword objective to:

D (3) Applications for new trails or trailheads shall include measures to reduce the spread of noxious weeds, such as incorporating boot brushes and educational signage.

Rationale: The new language can be interpreted broadly and we believe that specific measures, such as installing boot brushes, will provide tangible benefits.

Staff revisions call for the following new objective:

~~D (4) Applications for new trails or trailheads shall evaluate the potential for fire risk during critical fire hazard periods, and consider that evaluation in developing the physical and managerial setting of the site.~~

Recommendation: Reword objective to:

D (4) Applications for new trails or trailheads shall consider the potential of fire risk in developing the physical and managerial setting of the site.

Rationale: The new language provided by staff is difficult to understand and our edits are prosed to merely simplify the language.