



# Oregon

Kate Brown, Governor

Department of Transportation

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June 30, 2020

Columbia River Gorge Commission  
POBox:730  
1 Town & Country Square  
White Salmon, WA 98672  
RE: Management Plan Review Agency Comments

Members of the Gorge Commission and Gorge Commission Staff,

Thank you for the opportunity to provide comment on the Gorge 2020 Plan. ODOT, in conjunction with WSDOT submitted comments in March 2016. Some of our comments were addressed, but others were not. ODOT re-submits an annotated copy of those comments, along with the additional comments below.

ODOT text recommendations are cited by chapter and then page, with blue italics to explain the recommended change and strikethrough where appropriate.

## Part I, Chapter 3, Natural Resources

Proposed text on P109 – GMA Policies. 5. Practicable measures shall be applied to minimize unavoidable impacts to streams, ponds, lakes, aquatic and riparian areas.

*Please refine or modify the language regarding riparian areas. “Riparian areas” is a vague term (from the definitions in the Glossary, p484: Riparian area: The area immediately adjacent to streams, ponds, lakes, and wetlands that directly contributes to the water quality and habitat components of the water body. This may include areas that have high water tables and soils and vegetation that exhibit characteristics of wetness, as well as upland areas immediately adjacent to the water body that directly contribute shade, nutrients, cover, or debris, or that directly enhance water quality within the water body.) This definition with the “may include” language makes it difficult to assess riparian areas with certainty understandable to all parties.*

*Current SMA and GMA policies require buffers around water resources. Including riparian areas basically adds a buffer around a buffer. Scientifically, the term riparian (areas adjacent to streams that affect their function) is vague--a hydrologist would potentially define the riparian area as the hyporheic zone which in the Gorge would likely be only a few feet. Whereas a stream entomologist would look at potential detrital inputs which could be coming from many hundreds of feet. It is generally just difficult to define the “riparian” boundaries. These differing definitions could lead to confusion and uncertainty. The original language wetland/water resource section discusses the importance of riparian areas with wetlands and streams, but never placed a buffer on them- because they actually are buffers. Placing them as part of the water resources and then placing a buffer around water resources is putting a buffer around a buffer.*

*It would be less ambiguous and consistent with the current regulations if riparian areas were dropped from the regulations and replaced with buffers.*

From the summary of Natural Resources chapter changes provided with the Management Plan update materials on the Gorge Commission website, this chapter “Updated “sensitive wildlife species” to “rare” as a term, given that “sensitive” is both a specific type of status and also a generic term for status species.”

*Our resource specialists prefer the term “regulated” or “CRGNSA regulated” rather than “rare,” as this also has other meanings. ODOT supports removing the “sensitive” from the language for the reasons cited above.*

## Part I, Chapter 4, Recreation Resources

Page 163. GMA objective for resource based recreation (also in the SMA policy section overall goals):

1. Provide equitable and accessible (regardless of income level, ethnicity, gender, ability, or age) resource-based recreation opportunities

*ODOT strongly supports this change, as it could allow for public transit and alternative modes to support equitable access to recreation facilities.*

2. Collaborate with partner agencies and stakeholders to develop management strategies and actions to protect and enhance recreation opportunities and experiences, and natural, scenic and cultural resources from overuse at popular recreation sites and trails.

*ODOT strongly supports this change, as it is consistent with the recommendations in the 2019 Historic Highway Congestion and Transportation Safety Plan.*

### Page 169 Transportation Topic

*General comment – “Mass transportation” is an outdated term. Public transit or transportation alternatives is a much more flexible and common term to address the same topic. Public transit does not have to move a large amount of people, or “mass” to be effective in achieving the Scenic Area Goals.*

GMA Objective 2. Encourage *mass* transportation alternatives *and modal priority* to important recreation facilities that offer both access to such sites and recreation experiences themselves.

*ODOT recommends removing “mass” ahead of transportation as transportation alternatives include transit and add “modal priority” after “alternatives” so that land managers have the ability to plan how to prioritize those arriving at sites using various transportation modes.*

Page 170 GMA Policy 1. Except for sites predominantly devoted to boat access, accommodation of facilities for mass transportation shall be required for new RIC 3 and 4 day-use recreation sites, and encouraged for new RIC class 1 and 2 day-use recreation sites, where site design manages social encounters within the applicable standard.

*ODOT supports the inclusion of this provision in both the GMA and SMA, and appreciates that it keeps transit or transportation alternatives top of mind for land managers/owners developing recreational sites.*

Page 185 SMA Policy 6 Existing language includes “Comprehensive recreation resource planning shall be encouraged to foster a unified, regional approach and de-emphasize jurisdictional divisions.”

*ODOT suggests the above SMA policy language to be included in the GMA policy language found on page 163.*

## Part II Chapter 7: General Policies and Guidelines

Page 311. Rockfall structures were added rockfall structures to transportation facilities allowed outright (Under section H (1))

*ODOT supports the inclusion of rockfall structures, but seek clarity on definition of “structure” does this include rockfall mesh if it is draped from supports or pinned to a hillside (i.e. the structure)?*

Added extension of traffic barriers less than 50 feet to transportation facilities allowed outright (Under section H (5))

*ODOT supports the inclusion of traffic barriers, but seek clarity on definition – does this include cable barrier? Seems separate from guardrail which is explicitly called out.*

Replaced guardrails with “traffic barriers” to transportation facilities allowed outright, though the end of the paragraph indicates that this category does not include jersey barriers (Under section H (5)(1))

*Could you clarify the difference between a traffic barrier and the referenced jersey barrier? See above comment if this means cable barriers. Could it mean the white wooden guardrail found along the Historic Highway? The masonry rail? These are different from guardrails in the transportation world. Additionally, jersey barrier is*

*not a commonly used term anymore GM or concrete barriers are preferred to eliminate the geographic reference.*

Page 320. Under Expedited Development Review Process, Development eligible for expedited review (in both SMA/GMA) replaced “guardrail” with “traffic barriers” to elements eligible for expedited review, however this says “does not include jersey barriers”

*Barriers (including the concrete or GM, also known as jersey barriers) are a basic transportation safety tool transportation agencies use throughout the Gorge on the medians and shoulders of I-84 and other facilities. ODOT suggests including cable barriers and concrete barrier/jersey barrier in this segment to be eligible for expedited review.*

### Part III, Action Program Chapter 1, Climate Change

GMA policies on page 382 policy 5 (last sentence): The Gorge Commission will convene regional discussions on alternatives to automobile transit to achieve multiple objectives under the Act and to reduce greenhouse gas emissions.

*ODOT recommends modifying this sentence to read: The Gorge Commission will convene and coordinate activities and regional discussions in conjunction with state transportation and transit agencies on alternatives to automobile transit to achieve multiple objectives under the Act and to reduce greenhouse gas emissions.*

### Part III, Chapter 3 Economic Development

P 392. GMA policy 8: The Gorge Commission recognizes the importance of adequate, efficient and reliable infrastructure (such as water, sewer, roads, energy, telecommunications, and broadband) to protect health and safety, and to support the economic vitality of the Gorge.

*ODOT supports this language; however, the reference to roads is limiting and recommend replacing “roads” with “transportation network” to include items wider than just a specific strip of asphalt (broadening to network acknowledges the role of transit, bridges, or cycling, for example).*

### Glossary

P477 – Key viewing areas definition was clarified to include associated parking areas, rest areas, gathering spots, and trailheads. The Historic Columbia River Highway includes the Historic Highway State Trail.

*It is not clear from the language if the rest areas, gathering points, roads and trails are existing or future, and ODOT staff recommends clarification that the KVAs are only for existing facilities cited above, not those in design or under consideration. The majority of ODOT’s projects in the Gorge consist of creating Key Viewing Areas (The Historic Highway State Trail, associated parking areas, gathering spots, and trailheads), and it creates confusion as to from where we are meant to do our visual analysis.*

I am happy to answer any questions you may have on these comments and appreciate the opportunity to provide feedback to update and modify the Gorge Management Plan.

Sincerely,



Terra Lingley, AICP  
Oregon Department of Transportation  
Columbia River Gorge National Scenic Area Coordinator



**Washington State  
Department of Transportation**



**Oregon  
Department  
of Transportation**

March 2, 2016

Columbia River Gorge Commission  
PO Box 730  
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White Salmon, WA 98672

RE: Management Plan Review Agency Comments

Chair Bowen and members of the Columbia River Gorge Commission,

The Oregon Department of Transportation and the Washington Department of Transportation are collectively presenting proposed revisions our two agencies would like to see addressed in the upcoming Columbia River Gorge National Scenic Area Management Plan Review for your consideration.

The Columbia River Gorge is a national treasure. The Columbia River Gorge National Scenic Area was established by Congress to protect and provide for the enhancement of the scenic, natural, cultural and recreational resources of the Columbia River Gorge. The Columbia River Gorge serves as a primary regional transportation artery, including two interstate freight routes and unparalleled scenic highway. The Oregon and Washington departments of transportation are encouraging the Commission to use the opportunity presented by plan review to enhance the safety and efficiency of the transportation systems through the Gorge.

We have prioritized some opportunities for clarification/revision within the management plan that would help our agencies maintain the safety and efficiency of the Gorge's transportation systems. We look forward to working with your staff to include this recommended revision as part of the Management Plan Review.

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Recommended issues to be addressed in the upcoming plan revision process:

**1. Disposal Sites (II-7-53 (2))**

The Columbia River Gorge is a geologically dynamic place. Rocks fall, trees blow down, culverts overflow resulting in debris on our roadways. This debris requires immediate removal to maintain traffic flow. Our roads are life lines. They provide access to our communities, emergency responders and commerce. With over 28,000 average daily trips on Interstate 84 and 9,800 trips on SR 14, closures and delays have extreme impacts throughout the region.

There is an urgent need for new disposal sites in the Gorge close to where the material is being generated. Presently the Management Plan requires extensive planning requiring a reclamation plan and strict siting standards. These standards are appropriate to ensure that the scenic, cultural, recreational and natural

**This was not addressed in the Update. While one disposal site has been approved in Multnomah County for ODOT's use, the need is constant on both sides of the river.**

resources are protected. However, the Management Plan goes one step further by requiring that new disposal sites shall only be approved if the applicant demonstrates that it not practicable to locate the disposal site outside the NSA or inside an urban area. At a minimum, the applicants shall submit a feasibility and suitability analysis that compares the proposed disposal site to existing or potential disposal sites located both outside the Scenic Area and inside an Urban Areas. This requirement makes it challenging to site new disposal sites within the scenic area. Much of the activity requiring disposal is located within the SMA.

The Departments of Transportation are requesting that the Gorge Commission amend this language to say the following:

#### **Existing Language**

**Siting Standard.** The proposed disposal site shall only be approved if the applicant demonstrates it is not practicable to locate the disposal site outside the Scenic Area or inside an Urban Area. At a minimum, the applicant shall submit a feasibility study and suitability analysis that compares the proposed disposal site to existing or potential disposal sites located both outside and the Scenic Area and inside an Urban Area.

#### **Proposed Language**

**Siting Standard.** The proposed disposal site shall only be approved if the applicant demonstrates how to proposed site meets the need for disposal. At a minimum, the applicant shall describe the location, access and provide a use and development plan for the site. This analysis should include the size and location of the site in relation to surrounding land uses.

### **2. Geotechnical Investigations (II-7-21-1(P)5)**

Presently the Management Plan requires geotechnical investigations within the disturbed roadway prism with the shoulder or ditch line to obtain a full NSA permit review. We are requesting that they be eligible under the expedited review process. Timing is critical during the design development phase.

Geo-technical investigations typically require test pits. Test pit depths are typically no more than 12 feet deep due to equipment constraints. The width of a test pit is limited to the width of an excavator bucket, typically less than 3 feet. Some raveling and caving of the test pit side slopes will likely occur which will increase the width of the pit. Upon completion of the analysis, the pit will be backfilled with excavated material and compacted using the excavator bucket. Bore holes will be complete using truck, track or skid mounted drill rigs. Bore holes are typically 5 inches in diameter. The holes will extend until they hit rock and their depth will depend on specific geotechnical need in the specific location. Subsurface geotechnical test pits, bore holes and the necessary access routes are temporary in nature and will not have long term visual impacts.

#### **(II-7-21-1(P)5)Add Test pits, bore holes and temporary access**

P. The following transportation facilities provide they are not part of larger construction or reconstruction projects (which will be reviewed as a whole).

Please consider this addition to expedite geotech. investigations

(5) Test pits, bore holes and temporary access associated with geotechnical investigations located inside road, utility or railroad rights of way or easements that have been disturbed in the past provided (1) they are temporary in nature (2) and restored to their prior condition.

### 3. Barriers

The I-84 Corridor Strategy Team has developed a set of standards for new concrete barrier within the corridor. Presently new barrier within the National Scenic Area requires full NSA review while guardrail and guardrail ends do not. If the barrier complies with the Scenic Roadway Management Plan such as the I-84 Corridor Strategy Guidelines new barrier should be included as a use eligible for expedited review.

#### (II-7-21-1(P)(1) Barriers

P. The following transportation facilities provide they are not part of larger construction or reconstruction projects (which will be reviewed as a whole).

(1) New guardrail and guardrail ends, other than those allowed outright, new wire strand- and woven-wire access control fences and concrete barriers. ~~This category does not include jersey barriers.~~

### 4. Rock Fall Protection

Rock fall protection is a critical element of roadside safety and protective structures in the Gorge. Replacement of the existing rock fall protection should be allowed without review in the GMA (General Management Area) and SMA (Special Management Area) Open Space.

II-7-16 B. The following transportation facilities:

(1) Replace existing safety or protective structure, including guardrails, access control fences and gates, barriers, energy attenuators, safety cables, rock fall protection and traffic signals and controllers, provided the replacement structures (1).....

### 5. Cable Barrier

4-strand cable barrier is now required on some sections of Interstate 84 to improve motorist safety. These barriers are recommended to reduce the potential for road departure accidents resulting in serious injuries or fatalities to motorists. Recently, Oregon legislation was passed that mandated the installation of barriers in all sections of interstate with an open median less than 100 ft. wide to reduce the potential for cross over crashes. Replacement of existing safety barrier is allowed outright (II-7-16 (1)), however, new cable barrier is not called out in the Management Plan as a eligible expedited review use. As such, we are recommending that this added to list of expedited review uses.

#### (II-7-21-1(P)(1) PROPOSED LANGUAGE

P. The following transportation facilities provide they are not part of larger construction or reconstruction projects (which will be reviewed as a whole).

(1) New guardrail and guardrail ends, other than those allowed out right, and new wire-strand, woven wire access control fences and cable barriers.

There are some updates to barriers, but it is unclear what is eligible and what is not.

Items 4 and 5 were not included in the update, and ODOT requests considering these additions.

## 6. Recreation Intensity Class

This comment was addressed in the update language.

The Gorge Commission staff should revisit the recreational intensity class designations in relationship to transit services. Transit can provide a useful tool to help deal with congestion and illegal parking along the highways at the recreational destinations. However, the Management Plan's Recreational Intensity Classes are tied to the number of parking spaces and do not specifically address those accessing the site using transit. The Management Plan encourages transit use under recreation chapter but clarifying language would provide policy guidance and help the transportation agencies better manage parking and multi-modal access along our roadways.

Thank you for the opportunity to share some of issues we have encountered while maintaining our transportation systems through the Gorge. We look forward to working with your staff to ensure that we achieve the balance, protecting resources while maintaining access through the Columbia River Gorge National Scenic Area.

Sincerely,



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SW Region Planning Manager



Kelly Brooks  
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