



Date: February 6, 2008

CD-07-03-S—WSDOT Temporary Groundwater Monitoring Wells

DECISION MEMO and CONSISTENCY DETERMINATION
USDA, Forest Service, Columbia River Gorge National Scenic Area

Jennifer Wade, Project Manager

PROPOSED ACTION

Washington State Department of Transportation (WSDOT) has applied for a permit from the Forest Service to conduct a geotechnical analysis and install temporary (up to 3 years) groundwater monitoring wells for a period of one month. Wells would be 3” in diameter and be placed at a depth of up to 100 feet. They would extend up to 3’ above ground, and be located in 3 locations on National Forest System Lands.

The location of the project is Section 16 T1N, R5E WM, Lots: 300 & 400. The project is located in the Forest and Agriculture Land Use Designations in the Revised CRGNSA Management Plan and will be reviewed under expedited review due to the size and use of the structures and the temporary nature of the project.

PURPOSE AND NEED

WSDOT requested a permit to install these wells in order to collect data for a potential realignment of SR 14.

DECISION

I have decided to approve the proposed action as described in the project application, the attached findings of fact, and with the conditions listed for consistency with the CRGNSA Management Plan. The rationale for my decision is based on: 1) the proposed action fully meeting the purpose and need; 2) consistency with the Gifford Pinchot Forest Plan and the CRGNSA Management Plan; 3) review of the enclosed findings-of-fact; 5) review of the public comments on the project, and 6) review of evaluations by resource specialists.

SCOPING AND PUBLIC INVOLVEMENT

A notice to interested parties was sent on March 26, 2007 for a 30-day comment period. One public comment letter was received, from Friends of the Columbia Gorge (FOCG) on April 26, 2007. FOCG expressed concern that the project follows applicable guidelines. This concern is addressed in the Findings of Fact.

REASONS FOR CATEGORICAL EXCLUSION

I have determined that the proposed action is categorically excluded. Therefore, neither an environmental impact statement nor environmental assessment will be prepared. I make this determination based on the following findings:

1. I find the proposed action fits under Category 3, Section 31.2 Forest Service Handbook 1909.15-92.1, February 15, 2007: “Approval, modification, or continuation of minor special uses of National Forest System lands that require less than five contiguous acres of land.” This project is to issue a permit for the temporary use of NFS lands to research groundwater conditions on

less than 5 acres. Therefore, neither an environmental impact statement nor environmental assessment will be prepared. I make this determination based on the following findings:

I have determined no extraordinary circumstances exist that indicate a presence of possible significant effects. The project location within a congressionally designated area does not automatically require an EA or EIS. The project does not adversely affect the congressionally designated Columbia River Gorge National Scenic Area.

The proposed action does not negatively impact land or resources; it will not adversely affect any threatened, endangered or sensitive species of plant or animal, cultural resources, steep slopes, erosive soils, floodplains, wetlands, or other special areas or resources. A sensitive plant species found on site will be avoided and/or moved and replaced by replanting.

The project is not located within or adjacent to any inventoried roadless areas, Research Natural Areas or Washington State Natural Area Preserves. The project does not affect any reserved treaty rights of Native Americans. There are no unusual effects to minority or low-income populations by the proposed action. Therefore, neither an environmental impact statement nor environmental assessment will be prepared.

2. I have also determined that the proposed action is consistent with the Land and Resource Management Plan for the Gifford Pinchot National Forest as amended by the Northwest Forest Plan. The project design and mitigation measures described in the CRGNSA Consistency Determination Findings of Fact, referenced as CD-07-03-S, meet the Late Successional Reserve standards and guidelines.
3. I find that this project is consistent with the Columbia River Gorge National Scenic Area (CRGNSA) Management Plan provided that it is implemented as described in the CRGNSA Consistency Determination Findings of Fact, referenced as CD-07-03-S, and the following conditions are applied:
 - a) The project is implemented as described in the project description and consistency determination findings of fact.
 - b) The Natural Resource Mitigation Plan as notated in the attached findings of fact shall be implemented.
 - c) Surface ground disturbance shall be minimized within 200' of streams.
 - d) The drill holes shall be capped after the monitoring period is concluded to discourage the introduction of surface pollutants into groundwater and according to WA State law.
 - e) No vegetation greater than 2" in diameter shall be removed without prior approval.
 - f) The drilling shall be completed with track mounted equipment. If soil is displaced during drilling, any ruts created by the tracks shall be raked before seeding.
 - g) All soil disturbance shall be seeded with native grasses and/or shrubs immediately following the installation of the wells.
 - h) Mitigation for the peregrine nest is to limit noise that is above the ambient levels of SR14 between Jan 1 and July 1.
 - i) Auguring rather than pile driving or other impact equipment shall be used to drill the wells.
 - j) Equipment shall avoid down logs.
 - k) The color of the stand pipes shall be a non-reflective dark earth-tone found at the specific site or the surrounding landscape and shall be non-reflective.
 - l) The archeological protocol specified in the CRGNSA cultural resource report dated January 17, 2008 by Marge Dryden shall be followed.
 - m) An Archeological monitor shall be present at downhole locations on NFS lands and at the test location near the Marble Road junction (private land).

- n) The cultural site area of concern shall be staked on the ground by the archaeologist so that the areas to protect are clearly visible to the drilling workers.
 - o) The archeological monitor shall examine the areas disturbed during mobilization of the equipment.
 - p) If cultural resources are found, the Forest Service shall notify the Washington State Historic Preservation Office and the Indian Tribal Governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.
4. The Findings of Fact of the attached Consistency Determination form the basis of fact for my decision on federal lands.

Implementation Date: This project may begin immediately as long as it complies with the conditions as described in items 3(a-p) above. This decision expires on February 6, 2010. If implementation has not commenced before that date, a new consistency review or extension shall be required.

Appeal Opportunities: The NEPA portion of this decision is not subject to appeal pursuant to Forest Service regulations at 36 CFR 215.8 (a)(4). A written request for review of the Consistency Determination, with reasons to support the request, must be received within 20 days of the date shown with the Area Manager signature below. Requests for review are addressed to: Request for Review, Regional Forester, P.O. Box 3623, Portland, OR 97208.

Contact Person: The Columbia River Gorge National Scenic Area staff prepared an analysis file in conjunction with this project. For further information, contact Diana L. Ross at 541.308.1716, e-mail: dlross@fs.fed.us.

/s/Daniel T. Harkenrider

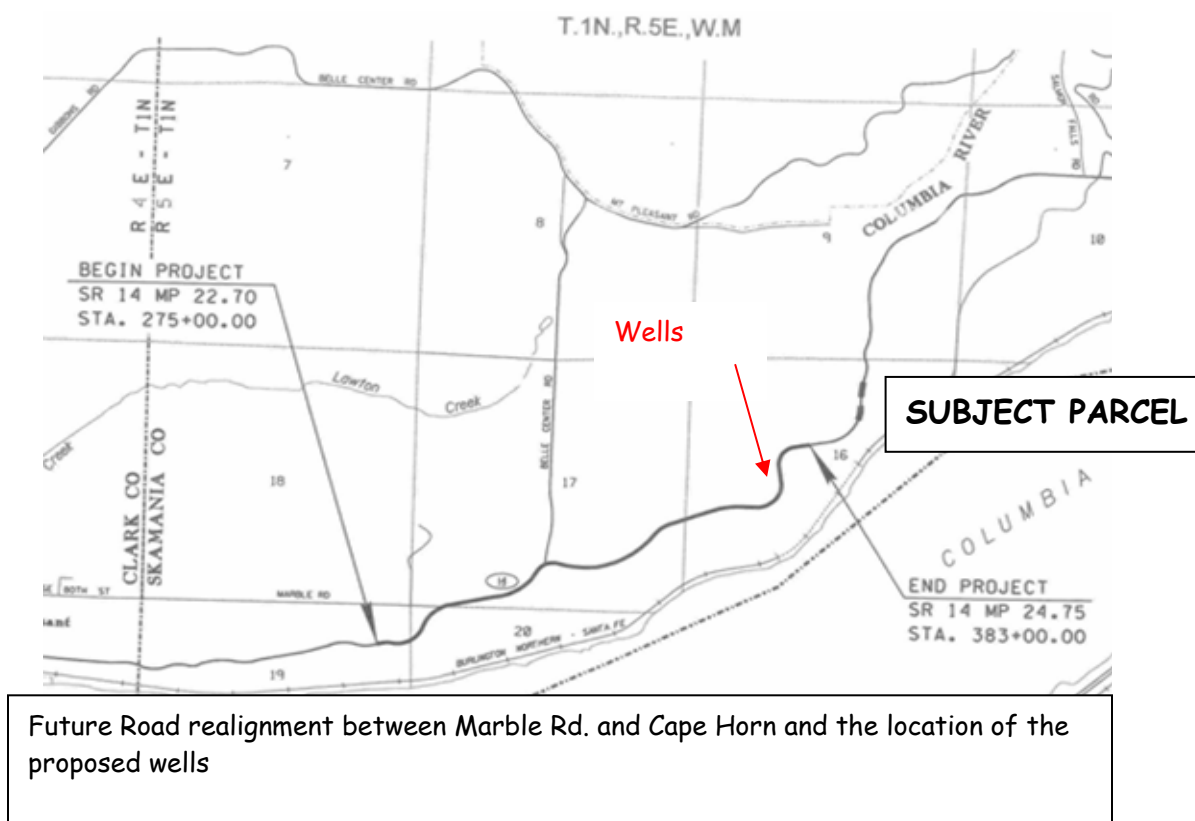
DANIEL T. HARKENRIDER
Area Manager

Date: February 6, 2008

cc: Jill Arens Director, Columbia River Gorge Commission
Rick Till, Friends of the Columbia Gorge
Jessica Davenport, Skamania County Planning

FINDINGS OF FACT

LANDOWNER:	USA—USDA, Forest Service
PROPOSED ACTION:	Install 3” x 103’ groundwater monitoring wells at three locations.
LOCATION:	Skamania County, Washington. Township 1N, Range 5E, Section 16 Taxlots: 300-400 QUAD 3 UTM: 562452 5046474
NATIONAL SCENIC AREA DESIGNATION:	Special Management Area (SMA)
LAND USE DESIGNATION:	Forest and Agriculture
LANDSCAPE SETTING:	Pastoral



FINDINGS OF FACT:

The following findings of fact contain the applicable standards and guidelines from the CRGNSA Management Plan. The Management Plan, as revised and adopted in 2004, is in effect. The CRGNSA Management Plan standards and guidelines are displayed in **bold type**. The findings are displayed in regular type.

A. Project Proposal

Washington State Department of Transportation (WSDOT) has applied for a permit from the Forest Service to conduct a geotechnical analysis and install temporary (up to 3 years) groundwater monitoring wells for a period of one month. They have requested to install these wells in order to collect data for a potential realignment of SR 14. Wells would be 3” in diameter and be placed at a depth of up to 100 feet. They would extend up to 3’ above ground, and be located in 3 locations on National Forest System Lands.

The location of the project is Section 16 T1N, R5E WM, Lots: 300 & 400. The project is located in the Forest and Agriculture Land Use Designations in the Revised CRGNSA Management Plan but is not allowed outright or allowed under expedited review because there was no practicable alternative to entering stream buffers.

B. Land Use Designations

1. The Management Plan, Part II, Chapter 2 (SMA Forest Land) SMA Guidelines, states:

- 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:**

C. Railroad and road construction or reconstruction (Guideline U. SMA Agriculture)

Finding: The geotechnical analysis is in conjunction with a road reconstruction project which is an allowed use, subject to review for compliance with scenic, cultural, natural, and recreational resource guidelines. The road reconstruction project will be reviewed separately after the results of this and other analyses are complete.

C. Scenic Resources

SMA Design Guidelines Based on Landscape Settings

1. The Management Plan, Part I, Chapter 1, Scenic Resources, SMA Guidelines, states:

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

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

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

Scenic Routes

- 5. Right-of-way vegetation shall be managed to minimize visual impacts of clearing and other vegetation removal as seen from key viewing areas. Roadside vegetation management (vista clearing, planting, etc.) should enhance views from the highway.**
- 6. Screening from key viewing areas shall be encouraged for existing and required for new road maintenance, warehouse, and stockpile areas.**

Findings: The project is within the Pastoral landscape setting. Per a condition required for water resources and the natural resources mitigation plan, any seeding and planting of disturbed soil will use vegetation native to the area.

SMA Guidelines for Development and Uses Visible from KVAs

1. The Management Plan, Part I, Chapter 1, Scenic Resources, SMA Guidelines, states:

- 1. The guidelines in this section shall apply to proposed developments on sites topographically visible from key viewing areas.**
- 2. New developments and land uses shall be evaluated to ensure that the required scenic standard is met and that scenic resources are not adversely affected, including cumulative effects, based on the degree of visibility from key viewing areas.**

Scenic guidelines 3-14.

Findings: The project area is topographically visible (source: Key Viewing Areas GIS layer) from nine KVAs. The project is in the background distance zone from 7 of 9 KVAs. The project is within the middle-ground distance zone from the Historic Columbia River Highway and SR-14. It is also visible from the foreground distance zone of SR-14. While the project area is topographically visible from nine Key Viewing Areas, the structures will only be visible from the foreground of SR-14. Due to vegetative screening on hundreds of acres of adjacent National Forest land, the size of the visible portion of the wells, and the distance from most KVAs, the project will not be visible from all other KVAs.

The scenic standard is visually subordinate; as required for Forest or Agriculture land use designations with a Pastoral landscape setting. This standard will be met from SR-14 with a condition requiring that the visible portion of the wells be painted a dark, non-reflective earth-tone color. The rest of the Scenic Resource guidelines either will be met due to the size of the project and the distance from KVAs, or are not applicable. Siting, landscaping, and vegetative screening are not necessary to meet scenic standards for a temporary small structure, the project will not break the skyline due to the height and size of the structures, and ground disturbance will be minimized as discussed in the Natural Resource Mitigation Plan.

D. Cultural Resources

1. The Management Plan, Part I, Chapter 2, Cultural Resources SMA Policies and Guidelines, states:

- 1. New developments or land uses shall not adversely affect significant cultural resources. (SMA Guideline 1)**
- 7. The Forest Service shall be responsible for performing steps 1 through 5 under guideline 4 for forest practices and National Forest system lands. (SMA Policy 7)**
- 8. The Forest Service shall consult with the Indian tribal governments and other consulting parties in performing steps 1 through 5 under guideline 4. (SMA Policy 8)**

Finding: The project was reviewed by CRGNSA archeologist Marge Dryden who found the following:

“I have completed a cultural resources review of the project and I have found that a cultural resource survey has been completed by Archaeological Investigations Northwest under a contract with WSDOT. AINW also has a Forest Service Special-use permit to conduct the investigations for the geotechnical testing and for the large project known as the SR-14 – Marble Road Realignment. Their final report will cover both projects. I am basing my findings on a memo report received from John Fagan, principal investigator for AINW.”

The 1997 programmatic agreement with the Washington state Historic Preservation Office and US Forest Service also identified this type of action for which a standard case-by-case review (stip. iii.b) is required. Three cultural resource sites were discovered near the project areas. Comments from Tribal representatives were solicited by WSDOT on behalf of Federal Highways and the Forest Service.

Avoidance measures will be needed to protect these unevaluated resources, as requested by Eirik Thorsgard. In conjunction with WSDOT, AINW and the Forest Service we have agreed to use the following protocol:

One test hole occurs within the area of concern for the cultural resources discovered by AINW.

- 1st option: make minor adjustment to downhole/drillhole location so that occurs within an area previously tested for cultural resources and where no cultural resources were located. There is a cluster of three negative shovel test probes and placement of the downhole location here would clearly meet the intent of Eirik's request.

Should adjustment of the test hole location be found unsuitable for geotechnical reasons then they will be required to follow:

- 2nd option: the archaeologist will conduct an archaeological shovel test at the preferred location to determine the presence or absence of cultural materials. If cultural materials are absent, then the drill hole will be placed within the shovel test location.

Additional stipulations include:

- Archaeological monitor will be present at downhole locations on FS lands and at the test location near the Marble Road junction (private land).
- Site area (area of concern) will be staked on the ground by the archaeologist so that the area to protect is clearly visible to the drilling workers.
- Access routes have already been included in the reconnaissance survey but the archaeological monitor will examine the areas disturbed during mobilization of the equipment.

In addition, a condition should be placed stating that should any historic or prehistoric cultural resources be uncovered during project activities, the applicant shall cease work and immediately notify the CRGNSA office and the Washington Office of Archeology and historical Preservation. The applicant should also notify the Indian Tribal governments within 24 hours if the resources are prehistoric or otherwise associated with Native American Indians.

E. Natural Resources

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

1. The Management Plan, Chapter 3, Natural Resources, SMA Guidelines, states:

A. All Water Resources shall, in part, be protected by establishing undisturbed buffer zones as specified in 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.

NWFP Riparian Reserves: Fish Bearing, Lakes, ponds: 300', Wetlands, perennial streams: 150', Intermittent Streams: 100'.

- (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.**
- 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.**
- 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.**
- G. Buffer zones shall be undisturbed unless the following criteria have been satisfied:**
- (1) The proposed use must have no practicable alternative as determined by the practicable alternative test. Those portions of a proposed use that have a practicable alternative will not be located in wetlands, stream, pond, lake, and riparian areas and/or their buffer zone.**
 - (3) Unavoidable impacts to wetlands and aquatic and riparian areas and their buffer zones shall be offset by deliberate restoration and enhancement or creation (wetlands only) measures as required by the completion of a mitigation plan.**

Findings: The two northernmost structures are located within the buffer of an unnamed perennial non-fish bearing stream. The Northwest Forest Plan (NWFP) 150' perennial stream riparian reserve does not apply as it is less protective than the CRGNSA 200' stream buffer. The conditions of guideline (3) above which require widening the buffer are not present. A reconfiguration of the CRGNSA buffer is not applicable.

Practicable Alternatives Test

The practicable alternative test was applied by WSDOT as follows:

A. Soil testing is completed at specific locations planned by WSDOT geotechnical engineers to assess consistency of underlying rock formations throughout the corridor, soil characteristics, soil bearing strength, and groundwater levels. Relocation of the proposed test locations would not provide the necessary critical data needed for further engineering work.

B. The proposed bore hole locations are not anticipated to have any adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas or sites, and occur at spot locations within the footprint of a planned highway improvement project. Temporary disturbance due to access needs will be minor and easily addressed with mitigation. Five of the six proposed test locations will be from the existing road prism of SR-14 in areas that would be considered to be previously impacted or disturbed. WSDOT will not remove any trees from existing highway right of way to

accommodate drilling. The single bore location on USFS property will have access designed to avoid sensitive plant locations and trees, and to minimize temporary effects to woody and herbaceous vegetation.

C. The proposed bore hole locations were reviewed by WSDOT geotechnical staff for alternative placement. Due to engineering data needs, it was determined that alternative locations were not suitable.

Conclusion: The proposed geotechnical work at six locations with riparian buffers do not have other practicable alternatives due to design constraints and data needs.

Staff notes that 3 of the above locations are on National Forest System Lands and two are located within the buffer of a perennial non-fish bearing stream.

Mitigation Plan

WSDOT prepared the following Natural Resource Mitigation Plan:

Avoidance of critical resources such as wetlands, sensitive plants, and trees will eliminate any risk of impact to these resources.

1. Protection Measures

- Resource protection measures will be used during the planning and implementation phases of the proposed geotechnical work. Mitigation measures (seeding) will be implemented immediately following removal of equipment.
- All equipment will be thoroughly washed prior to entering critical areas, and between boring locations to eliminate the spread of noxious or nuisance vegetation.
- Avoidance, minimization, and mitigation measures will ensure that the short-duration geotechnical work will not result in a loss of water quality, natural drainage, fish/wildlife/plant habitat, and water resources.

2. Vegetation Retention

- WSDOT will design access routes to avoid trees greater than 4-inches DBH and stands of woody vegetation. Within the riparian zone, minor trimming of existing woody scrub shrub vegetation may be required for equipment function and adjustment at the drill sites. In this situation, existing woody vegetation (Salmonberry, Elderberry) will be cut using current horticultural techniques to a height of 8-inches to 12-inches. The existing root systems and crowns will not be disturbed; resprouting of cut vegetation will occur during the first growing season following the geotechnical work and recovery of the existing native vegetation and plant community is fully anticipated.
- No additional revegetation work or long term establishment is anticipated.

3. Habitat Rehabilitation

- Minor temporary impacts to riparian zones will be fully rehabilitated by implementing the proposed avoidance, minimization, and mitigation measures., minor trimming of existing woody scrub shrub vegetation may be required for equipment function and adjustment at the drill sites. In this situation, existing woody vegetation (Salmonberry, Elderberry) will be cut using current horticultural techniques to a height of 8-inches to 12-inches. The existing woody vegetation (Salmonberry, Elderberry) will be cut using current horticultural techniques to a height of 8-inches to 12-inches. The existing root

systems and crowns will not be disturbed; resprouting of cut vegetation will occur during the first growing season following the geotechnical work and recovery of the existing native vegetation and plant community is fully anticipated.

No other impacts or rehabilitation to the structure, function, and composition of riparian resources is anticipated. Snags, aquatic resources, substrata, large woody debris, or boulders will not be disturbed.

4. Feasibility of Mitigation Standards

WSDOT has determined that the avoidance, minimization, and measures identified in this plan are reasonable and feasible from technical and operational perspectives.

5. Sensitive Plants

- No sensitive plants or associated habitat will be impacted on a permanent or temporary basis as part of the proposed geotechnical work. WSDOT will flag 10-foot “no work” buffers around all known individuals of tall bugbane within the vicinity of the bore locations and access routes. Several individuals of tall bugbane have been identified and mapped using GPS technology during several extensive reviews of the project corridor. The no work buffers will protect existing plants and associated soil structure. No changes to canopy cover over the known populations of tall bugbane will occur as no trees will be cut. Access routes will be carefully designed to avoid these areas.

6. Wetland Mitigation and Other Aquatic Resources

- No wetlands or other aquatic systems such as perennial, intermittent, or seasonal streams, ponds, or seeps will be impacted as part of the proposed geotechnical work, and mitigation is not warranted.

Staff notes that the buffer zone of a perennial stream will be entered and conditions are recommended in these findings of fact to mitigate that entry.

7. Temporary Erosion and Sediment Control Measures

- WSDOT implements Temporary Erosion and Sediment Control (TESC) measures on any project that may potentially disturb soil in accordance with the WSDOT Highway Runoff Manual. These measures include planning, procedural, and physical BMP's. For small projects, BMP's will be deployed as physical conditions warrant.

Planning BMP's

- Access routes have been planned to avoid crossing aquatic resources and other sensitive areas. Alternative drilling measures (sled/platform) will be used in areas too steep for traditional access.

Procedural BMP's

- Access routes will be staked in the field to avoid impacts to trees.
- Vegetation buffer areas around sensitive vegetation communities will be flagged.
- Work limits will be established at each boring location.

With the successful implementation of these measures and the additional requirements recommended in these findings of fact, the disturbance to the buffer is adequately mitigated.

Wildlife and Plants

1. The Management Plan, Chapter 3, Natural Resources, SMA Guidelines, states:

- A. Protection of sensitive wildlife/plant areas and sites shall begin when proposed new developments or uses are within 1000 ft of a sensitive wildlife/plant site and/or area.**

Sensitive Wildlife Areas are those areas depicted in the wildlife inventory and listed in Table 4, including all Priority Habitats listed in this Chapter. The approximate locations of sensitive wildlife and/or plant areas and sites are shown in the wildlife and rare plant inventory.

Finding: The project area is within 1000 feet of both sensitive plant and animal species. Therefore, a survey was conducted in the project area. Riparian Areas are a Priority Habitat. CRGNSA biologist Fiedler found that the project will have little risk for aquatic impacts on this perennial but non-fish bearing stream. Species that may be impacted by this action include a peregrine nest within 1/2 mile, as well as potential habitat for 3 species on the Northwest Forest plan survey and manage list (*Cryptomastix devia*, *Hemphillia malonei*, *Prophysaon hesperium*). Mitigation for the peregrine nest is to limit noise that is above the ambient levels of SR14 between Jan 1 and July 1 (nesting period for this elevation zone). Avoidance of down logs, and keeping the tree canopy intact will greatly reduce negative impacts to the 3 terrestrial mollusk species and will maintain persistence of these species from the well drilling action. Conditions should be placed requiring that these items be added to the Natural Resource Mitigation Plan.

WSDOT biologist Glen Mejai found that no suitable habitat for listed species was found in the work zone for sensitive wildlife. Suitable habitat exists for tall bugbane, a sensitive plant species. One individual was found in the NFS Lands portion of the project area. WSDOT responded by avoiding the plant by slightly rerouting the path taken by the drilling machinery. Robin Dobson, CRGNSA botanist, was consulted as per Management Plan requirements and concurred with the steps taken to ensure no disturbance to tall bugbane. With conditions and the implementation of the Natural Resources Mitigation Plan, the proposal meets the above guidelines.

Soil Productivity

1. The Management Plan, Chapter 3, Natural Resources, SMA Guidelines, states:

- 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: Mark Kreiter, CRGNSA hydrologist, stated on April 26, 2007 “my understanding is the drilling will be completed with a track mounted rig and no other vehicle access will be needed...if soil is displaced during drilling, rake out any ruts created by the tracks and cap drill holes to discourage introduction of surface pollutants”. A condition should be placed requiring these mitigations. The Natural Resource Mitigation Plan will meet the requirements of the rest of these guidelines.

F. Recreation Resources

1. The Management Plan, Chapter 4, Recreation Resources, SMA Guidelines, states:

- 1. New developments and land uses shall not displace existing recreational use.**
- 2. Recreation resources shall be protected from adverse effects by evaluating new developments and land uses as proposed in the site plan. An analysis of both onsite and offsite cumulative effects shall be required.**

Finding: There are no existing recreational developments in the vicinity of the project area. “Passive” recreational use is expected to occur (e.g. hiking), but the project will not displace this use.

G. Conclusion

The proposed geological testing project as described above for the Columbia River Gorge National Scenic Area, is consistent with the National Scenic Area Management Plan Guidelines provided they meet the criteria and conditions listed in the Findings of Fact and Consistency Determination.