



TO: Columbia River Gorge Commission
FROM: Friends of the Columbia Gorge
RE: Gorge 2020 Draft Recreation Resources Chapter Revisions
DATE: June 30, 2020

Friends of the Columbia Gorge (Friends) is a non-profit organization with approximately 6,500 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside within the Columbia River Gorge National Scenic Area.

The Gorge Commission stated at the beginning of the plan review process that recreation would be a primary focus due to congestion issues as well as missed opportunities to improve recreation experiences. While many of the policy revisions modernize the Management Plan, these changes aren't adequate to address the recreation issues people are most concerned about.

The policies in the recreation section do not constitute a comprehensive plan for recreation and without it these problems will continue to grow. We believe the agencies and partners should work together towards a comprehensive review of the current and future recreation concerns that exist throughout the Gorge. In addition, we advocate for the Climate Resiliency Plan to include recreation based transportation needs, and considered in adopting future climate resiliency solutions.

Friends supports many of the technical updates included in the Draft Revised Management Plan. In addition, Friends and hundreds of members of the public identified many of the following technical and substantive deficiencies in the Recreation Resource Chapter of the Management Plan during the scoping and in subsequent comment opportunities. Please included these edits in the Final Revised Management Plan.

Recreation Resources Chapter:

GMA Objectives

- 1. GMA Objective 2 and 3, Trails and Pathways, Page 167.** Friends recommends combining the two into one objective. Combining the two objectives that share the goal of connectivity makes sense as communities work to connect to one another through trail systems.

Friends proposed revision (Delete text in blue strikethrough, new text in bold blue, Commission draft revisions are in red):

~~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.~~

~~3. Establish a loop trail around the Scenic Area.~~

2. **GMA Objective 6.D, Trails and Pathways, Page 168.** Friends recommends keeping objective as is. 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.

Friends proposed revision (New language in bold blue, Commission draft revisions are in red):

~~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.~~

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GMA Policies

3. **GMA Policy 8, Trails and Pathways, Page 169.** Friends recommends keeping objective as is. 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.

Friends proposed revision (New language in bold blue, Commission draft revisions are in red):

~~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.~~

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GMA Guidelines

4. **GMA Guidelines, Approval Criteria for Recreation Uses 1.D(3), Page 179.** Friends recommends rewording the objective. The new language can be interpreted broadly and we believe that specific measures, such as installing boot brushes, will provide tangible benefits.

Friends proposed revision (New language in bold blue, Commission draft revisions are in red):

D.(3) Applications for new trails or trailheads shall take measures to reduce address and minimize the potential spread of noxious weeds by requiring boot brushes and educational signage.

5. **GMA Guidelines, Approval Criteria for Recreation Uses 1.D(4), Page 180.** Friends recommends rewording this objective. The new language provided by staff is difficult to understand and our edits are proposed to clarify and simplify the language.

Friends proposed revision (New language in bold blue, Commission draft revisions are in red):

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.

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