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**Scenery as Policy: Public Involvement in Developing a
Management Plan for the Scenic Resources of the
Columbia River Gorge**

by

GORDON MATHEWS EULER

A dissertation submitted in partial fulfillment of the
requirements for the degree of

DOCTOR OF PHILOSOPHY
in
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Portland State University
1996

DISSERTATION APPROVAL

The abstract and dissertation of Gordon Mathews Euler for the Doctor of Philosophy in Public Administration and Policy were presented May 8, 1996, and accepted by the dissertation committee and doctoral program.

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ABSTRACT

The abstract of the dissertation of Gordon Mathews Euler for the Doctor of Philosophy in Public Administration and Policy presented May 8, 1996.

Title: Scenery as Policy: Public Involvement in Developing a Management Plan for the Scenic Resources of the Columbia River Gorge

The Columbia River Gorge National Scenic Area (NSA) was created in 1986 in response to a growing interest in preserving the scenic beauty of the gorge. The creation of the NSA and other areas around the country with a scenic resource emphasis indicates a growing interest in protecting landscapes with diverse scenic qualities that are not showcase areas such as the Grand Canyon and Yosemite.

NSA mandates included the protection and enhancement of scenic, natural, cultural, and recreational resources (SNCRs) as the primary concern in the consideration of new land uses. The NSA management plan contains a complex mix of management tools for the protection of SNCRs in the gorge.

This research was an investigation into how scenic resources policy was developed, with a focus on the scenic resources of the NSA. One issue was the definition of scenic resources, which are undefined in the

management plan. Because of the difficulty of identifying scenic resources, other resources may be managed as a surrogate for them. An analysis was made of the scenic resources management schemes of several federal reserve lands with a stated scenic management objective to determine if this was the case, and to compare their management strategies for the NSA. ²

A second issue was the public's understanding of what constitutes a scenic resource, and the role that public input had in the development of the management plan. Empirical work suggests that complexity of issues may hinder successful public input processes. A final issue was how identifiable stakeholders in the Columbia River Gorge differed in their views on scenic resources, which may depend on their proximity to and relationship with such resources. Results of data analysis and the interview process reveal that public understanding about scenic resource concepts is low, and that gorge planners were primarily responsible for development of scenic resources policy in the NSA management plan. As expected, there were some identifiable differences in the views on scenic resources among various stakeholders. Scenic resources management elsewhere is done primarily through traditional zoning requirements, and the basis of management of scenic resources appears to be for other culturally-defined purposes such as recreation.

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Chapter I

INTRODUCTION

The focus of this research is an analysis of the development of the management plan for the Columbia River Gorge National Scenic Area (NSA). The NSA was created by P.L. 99-564, the Columbia River Gorge NSA Act (the Act), which was passed by Congress and signed into law by President Reagan in 1986.

The Act was a singularly important legislative event because it legitimized the importance of scenic, natural, cultural, and recreational resources (SNCRs) in a way that was without precedent, placing them ahead of economic development in importance in the NSA. The Act supported the concept that development must be consistent with preservation of SNCRs, not the other way around. The NSA was heralded as a land use experiment where the magnificent scenic, natural, cultural, and recreational resources of the Columbia River Gorge would be enhanced and protected through an innovative partnership, while at the same time protecting the economies of local communities in the gorge.

The Act

creates a novel mechanism for protecting large, populous, and geopolitically-complex areas which, for a variety of reasons may

be unsuitable for more traditional protection as a national park² or national recreation area (Blair, 1987).

This protection was to be accomplished through the development and implementation of a management plan for the gorge that treated the included area as a single region. The plan includes sections on:

- goals, objectives, policies, and guidelines for resource protection and enhancement, with chapters covering scenic, natural, cultural, and recreation resources;
- goals, objectives, policies, and guidelines for the designations of agricultural land, forest land, open space, residential land, commercial land, and recreation land; and
- the role of management agencies (Columbia River Gorge Commission and the U.S. Forest Service, 1992).

This research examines the development of policies to protect the scenic resources of the gorge, given its new status as a national scenic area. The NSA was chosen as a study area because of the importance the Act placed on scenic resources, as opposed to just including them in a multiple-use context. The analysis focuses generally on strategies used to protect and manage scenic resources, and specifically on the process of developing such strategies for the gorge.

As a starting point, the management strategies for scenic resources in other federal land reserve areas were examined to determine the relative importance of scenic resources in the hierarchies of natural resources management in areas with an implied or expressed scenic resources management mandate. The purpose for this review was to establish what is current practice for management of scenic resources, because the management models of some of these areas were examined when strategies for the NSA were being formulated. Management strategies were also analyzed to determine whether other resources in

the landscape are managed as a surrogate for scenic resources management. This is less a function of the particular strategies or schemes established and tools used than an assessment of the overall strategies for what is being managed or manipulated in the landscapes of these areas.

Provisions of the NSA management plan were subjected to more than three years of discussions in an aggressive public involvement process. During this time, proposals were put forth to the public by various means, and the public was asked to respond. Another component of this research was the examination of the entire public record established during the planning process to determine how and why scenic resources were identified and policies to protect them came about, what the public had to say about these policies, and what, if any, changes were made to such policies in response to public concerns. The opportunities to participate in decision-making and the results of that participation are issues that were investigated. A central question addressed the role that the public played in defining the public interest with regard to scenic resources in the NSA. The development of the NSA management plan offered an excellent opportunity to examine scenic resources protection issues and the dynamics of policy development through the public involvement process.

The final part of this research was to determine if various identifiable NSA stakeholders or “publics” held similar or differing views on scenic resources. This was accomplished by reviewing all public responses to drafts of scenic resource policies and subsequent drafts of the

management plan. The public record was readily accessible for this purpose, although the data was secondary.

The purpose of this research is to contribute to the understanding of scenic resources by an analysis of how they are addressed in other areas with scenic resources mandates, as well as an analysis of the development of scenic resource policies for the NSA. This is accomplished by describing the policy development process for scenic resources protection in the gorge, and analyzing the public's role in influencing the development of such policy, in light of present-day management models which emphasize traditional resource use and which scarcely define scenic amenities. This research does not provide a definitive history of the Columbia River Gorge, or detail the efforts made over the years to manage it. However, some background on both subjects is necessary and will be presented to set the context for subsequent discussion.

THE CONTEXT OF THE CREATION OF THE SCENIC AREA

The Columbia River divides Oregon and Washington along its western run from the Columbia Plateau to the Pacific Ocean. Where the river bisects the Cascade Mountains of the Pacific Northwest is located a seventy-five mile gorge that contains world-class landscapes in the form of forested mountains, rock outcroppings, sheer cliffs, and spectacular waterfalls, in addition to a series of transitional ecosystems. Scenic beauty provides a critical resource base for the tourism industry, which is a major component of the economy in a number of states, including Washington and Oregon.

Ever since the completion of the Historic Columbia River Highway in ⁵ 1916, the Columbia River Gorge has been the subject of discussions on how best to plan for and encourage local economic development while at the same time provide for protection of scenic resources that provide the backdrop for such development. The gorge is a major part of Portland, Oregon's hinterland, and the debate in recent years has centered on the recreational use of the gorge and the extent to and manner in which gorge resources should be managed. Many other resources in the gorge have received national attention, most prominent being the salmon fisheries of the Columbia Basin and the production of hydropower to fuel industrial development at the gorge's west end. The gorge has been characterized as a national treasure, even though it is not a wilderness or pristine park (Packwood, 1984). It is a working landscape, defined by Hiss (1990) as one whose function and look, or character, or feel, have been shaped over time by sequential, ongoing human activities as much as by natural processes. This is an important concept in the debate over preserving an area that has already seen substantial development.

Federal lands management was highly contentious in the 1980s. The Republican ideology espoused by President Reagan and implemented by then-Secretary of the Interior James Watt was that natural resources were put on the earth for exploitation by humankind. The 1980s saw the development of the "Sagebrush Rebellion," a movement by some Western states to gain more control over decision-making on (or outright ownership of) lands managed by the Federal government. The "rebellion" spawned the "Wise Use" movement, which is pro-local control, pro-property rights and anti-environmentalist in orientation. The

movement is a small but vocal group of ranchers, miners, and petroleum⁶ and timber interests with an intense dislike for rules and regulations associated with the use of resources on public lands.

The anti-regulation sentiment in part fueled the debate about management of lands in the Columbia River Gorge. Proposals for the gorge ranged from greater local control in the management of gorge resources to management by a combination of the National Park Service (NPS) and an inter-governmental commission. The political climate surrounding the formation of the NSA is well documented by Abbott et al. (in press). The 1980s atmosphere of pro-development and de-regulation would not seem to support the NSA's creation. President Reagan stated that he was strongly opposed to federal regulation of private land use planning, but was signing the NSA legislation because of far-reaching support in Oregon and Washington for a solution to long-standing problems related to the management of the gorge (U.S. Code Congressional and Administrative News, 1986).

The NSA includes parts of Washington's Clark, Skamania, and Klickitat Counties, and parts of Oregon's Multnomah, Hood River, and Wasco Counties (Figure 1). Of the NSA's 292,615 acres, about 70 percent is in private ownership, and most of the rest is federal land (Meyers and Meschke, 1984).

RESEARCH SIGNIFICANCE

Opie (1983) states that "looking" is the principal activity at parks, forests, and recreation areas, and that these settings are something special in visitors' experiences. The literature, however, suggests that

Figure 1
VICINITY MAP
COLUMBIA RIVER GORGE NATIONAL SCENIC AREA

scenic resources are difficult for the public and for policy makers to address, principally because they are intrinsic in nature, and are often not well-defined. Ridout (1988) states that

In the field of visual resource studies, there has been little attention, as yet, to understanding how the special nature of a purported "intangible" like scenic beauty might influence efforts to create public policy. In this circumstance, a descriptive study of a specific case can be useful to generate information and suggest guidelines for future action.

Management of scenic resources is based on a combination of positive and normative elements related to the importance of nature and aesthetics to the human condition. An important question is how these elements are translated into public land and natural resource policy and management. Schauman (1988) concludes from a literature review that, among other things, no studies relate visual quality of the countryside to individual and collective decisions concerning land use. This research will hopefully show a link between scenic resources, which are not well defined, and the complexity of strategies to manage them. Such strategies may not be entirely understood by the public because such resources are not prevalent in terms of public interest priorities. This is the case especially where there are concerns over the "subjectivity" of the resource and a political climate that favors reducing the rulemaking agenda and placing more decisions in local hands (Ridout, 1988).

Francis (1990) raises the question of state interest in the control and development of natural resources judged critical to the security of the state, while at the same time noting that the state must preserve and protect the natural environment as a fundamental source of values for human communities. From an overall management perspective, the

question is the relative importance of the public interest in scenic resources protection, since the mandates of the NSA were a departure from the traditional technocentric paradigm for natural resources management. This research will contribute to a theoretical understanding of the relative importance of scenic resources through an analysis of management schemes developed and implemented in other reserve areas.

Costonis (1982) states that the debate over scenic beauty

is in truth a surrogate for the debate over environmental change itself, or, to be more specific, the question whether that change is culturally disintegrative or culturally vitalizing. At stake are whether change should be permitted, what form it should take, what this pace should be, who should be benefitted, and what role public administration can play as a vehicle for managing change.

Chapter II

LITERATURE REVIEW

This chapter provides a review of the literature and relevant history of scenic resource management scheme development, in order to lay a foundation for research hypotheses. Toward this end, this chapter includes the following:

1. a description of the influences and mandates related to current approaches to scenic resources management;
2. theoretical issues surrounding the development of scenic resource management schemes; and
3. the relationship of these issues to questions about how a scenic resource strategy was developed for the NSA.

THE CONTEXT OF SCENIC RESOURCES MANAGEMENT

The concept of landscape as a source of pleasure and satisfaction is, historically, relatively recent. American writers and artists adopted the eighteenth- and nineteenth-century English aesthetics concepts of sublime and picturesque landscapes originally associated with gardens and their surrounding parks (Zube, 1986). Smith (1970) states that normative public values toward land and the landscape during America's first 100 years were shaped by a belief in an inexhaustible stock of landscape resources, the need to settle the unsettled areas of the country

and the need to transform nature from a savage wilderness into a bountiful garden. Schauman (1988) states that the value systems of agrarianism, ruralism, and pastoralism have shaped attitudes to countryside in the past and continue to do so today.

Frederick Law Olmsted believed the preservation of scenery was justified precisely because it provides a stimulus to engage what he called the contemplative faculty, that which is necessary to get the mind to disengage from getting tasks done (Sax, 1980). Olmsted's 1865 report on the management of the Yosemite Valley was the first systematic exposition in America on the individual's right to enjoy large, impressive public reservations of natural scenery and the government's obligation to protect that right (Todd, 1982). Preservation of natural scenery in as pristine a state as possible and an outright rejection that parks should facilitate access for great numbers of people were part of Olmsted's legacy. His report (Roper, 1953) concluded that:

In the interest which natural scenery inspires the attention is aroused and the mind occupied without purpose, without a continuation of the common process of relating present action, thought or perception to some future end. There is little else that has this quality so purely.

Olmsted also advocated large naturalistic parks in modern cities because they offered opportunities for the quiet contemplation of natural scenery, which was necessary to raising the level of civilization in America (Schuyler, 1986).

The idea of a land aesthetic has been articulated by Leopold (1949) and Whyte (1968). It recognizes the beauty of ordinary natural environments such as river bottoms, wetlands, and rolling hills as much as it does set-aside picturesque landscapes such as Yosemite, the Grand

Canyon, or Yellowstone. Leopold touts the scenic beauty in all environments, but, as a social paradigm, laments the fact that alteration and management of the land does occur and cannot be prevented. Whyte urges that open space be preserved, not only to prevent us from imposing our middle class values on future generations, but also to maintain a landscape aesthetic. Callicott (1989) states that the land aesthetic calls attention to the psychic-spiritual rewards for maintaining the biological integrity and diversity of the rural landscape. The issue for the NSA was to articulate a land aesthetic that would be understood and acceptable to a primarily skeptical gorge public.

SCENIC RESOURCE MANAGEMENT MANDATES

Natural resource management is a balance between differing views on the importance of nature. Technocentrism, described by Hays (1959), views the natural environment as providing the necessities for humankind to profitably shape its destiny. The technocentric tradition relies on rationality, value-free analysis, and the ability to control social, physical, and biological processes. It is resistant to the acceptance of lay opinion, which makes it difficult to ensure minority views and consideration of non-quantifiable factors such as landscape amenities (O'Riordan, 1976). Ecocentrism, described by McConnell (1965), is characterized by reverence and humility toward nature, limitations on human behavior because of natural processes, and the need for greater participation and communication among groups with conflicting agendas (O'Riordan, 1976).

Our attitudes about nature are derived from the importance and value we place on it. Colby (1990) describes present-day natural resource management as a paradigm of environmental protection, which trades off the environment (the protection of which is the Act's first goal) and economic growth (the Act's second goal). The traditional model has employed strategies to ameliorate the effects of human activities, rather than to improve development practices and ecological resilience. Legalization of the environment as an economic externality is a principal strategy of this paradigm, and policy responses have been command-and-control regulatory approaches. Colby (1990) concludes that environmental protection is merely a modest variation of technocentrism. The mandates and priorities of the Act presented a direct challenge to the technocentric paradigm with its emphasis on economically-definable commodities and its value-free analysis.

Zube (1986) describes several phases in landscape policy development, from landscape disposal and development of recreation landscapes to landscape preservation and the amelioration of scenic ills. The current phase is that of environmental planning, which began with the passage of the National Environmental Policy Act (NEPA) in 1969. NEPA requires that unquantifiable environmental amenities and values be given appropriate consideration in decision-making along with economic and technical considerations, though this has been difficult to do in practice. Environmental impact statements have rarely met NEPA requirements for consideration of visual and scenic resources (Andrews and Waits, 1978; Smardon et al., 1986; Sancar, 1988).

The need for planning and protection strategies arose when use of some natural resources impacted the use or enjoyment of other natural resources in a multiple use situation, particularly when the former were consumptive resources (the use of which physically alters the landscape) and the latter non-consumptive resources. The technocentric view has usually prevailed in this context.

The spate of resource-oriented legislation enacted in the 1960s and 1970s is testimony to the interest in both scientific management of resources lands and to the necessity for public input into the planning for the uses of resources lands. The result of the applications of substantive provisions contained in such laws as the Wilderness Act (1964), the Wild and Scenic Rivers Act (1968), the National Trails Act (1968), the National Forest Management Act (NFMA) (1976), and the Federal Land Policy and Management Act (FLPMA) (1976), coupled with the procedural requirements of the Administrative Procedures Act and NEPA was an interest in the management of federal lands that was as intense as it was unprecedented.

Comprehensive land planning began as a result of the 1976 National Forest Management Act and the 1976 Federal Land Policy and Management Act. These laws set new direction for the U.S. Forest Service (USFS) and the Bureau of Land Management (BLM), respectively. These agencies had historically managed lands for multiple use, loosely defined as that combination of uses that best meet the needs of the American people while making the most judicious use of the land. However, multiple use is a term with great conceptual, ideological, and emotional value. Clawson (1975; 1983) states that the result has been

wide disagreement in interpretation when the general idea is put into practice. As stated earlier, management has generally favored a technocentric approach.

Section 6 of NFMA, which addresses national forest planning, makes no mention of scenic resources, but does require planning for outdoor recreation, to include wilderness. USFS regulations on recreation resources include a section on inventorying and evaluation of visual resources and defining visual quality objectives for resource lands based on visual attractiveness of the landscape and the public's visual expectations. The USFS has operationalized scenic criteria through the application of formal landscape architecture criteria, using dominance elements—the basic visual modes of form, line, color, and texture—which are assumed to be the basic ingredients of landscape perception (Taylor et al., 1987). Added to these modes are variables of motion, light, atmospheric conditions, season, distance, observer position, scale, and time (U.S. Forest Service, 1974). These criteria are applied through a system of visual quality objectives (VQOs) to management units within national forests. National forest management plans contain visual resource management goals and objectives, which include preservation, retention, partial retention, modification, or maximum modification of forest landscapes. McCool et al. (1986), however, state that the public does not sharply differentiate between the visual quality in these five categories.

The language of FLPMA is somewhat more definitive. Section 102(a)(8) states as a policy that public lands will be managed “to protect the quality of. . .scenic. . . values,” and scenic values were listed the

FLPMA definition of multiple use (section 103(c)). Areas of critical environmental concern (section 103(a)) were also to be identified based in part on the protection and prevention of irreparable damage to important scenic values. In both sections, scenic values were well down in the included lists. BLM's operational criteria stress the importance of visual elements of design, especially in terms of the strength and variety of form, line, color, and texture. Landscape factors are scored and the results are management classes (One to Five) of scenic quality (Bureau of Land Management, 1980). The emphasis in FLPMA planning, however, remains on the principles of multiple use and sustained yield. Consideration of scenic values is required, but none of these acts resolves the question of priorities among values in decision-making.

The other important federal land manager with regard to scenic resources is the National Park Service (NPS). The NPS was established in 1916 (P.L. 64-235) to promote and regulate the use of national parks, monuments, and reservations to conserve the scenery and the natural and historic objects therein, and to provide for the enjoyment of the same in such a manner that will leave them unimpaired for future generations. The NPS has no specific scenic resource management component, but identifies rural historic landscapes using evaluation criteria that include landform, vegetation, and response to the natural environment. Essentially, the NPS manages on the basis of past and present human use of a given landscape, and even its "conservation areas of significance" are areas where the landscape has been the subject of an important stage, event, or development in the conservation of natural or cultural resources (U.S. Department of the Interior, 1992).

Several other federal laws exist that also reflect the value of scenery.¹⁷ The Wilderness Act (P.L. 88-577) lists scenic values in the criteria used to define wilderness areas, but they are mentioned in a list of “other features of value.” One avenue of protection for scenic vistas is not to allow any development to be seen from them, and designating an area as wilderness prevents any development from occurring, at least within the wilderness area. Of course, there is no guarantee of protection on lands adjacent to and viewable from wilderness areas. The prohibition on development is precisely why Dana and Fairfax (1980) and Clawson (1983) state that, as a land management strategy, wilderness designations continue to be controversial, because the debate continues over the status and uses of wilderness lands and bordering reserve land areas.

The Wild and Scenic Rivers Act (P.L. 90-542) provides for designation of rivers (or reaches thereof) and their immediate environments “that possess outstandingly remarkable scenic, recreational,. . .or other similar values.” Scenic values are listed first, which is suitable given the title of this act. Pollution, channelization, overgrazing, diversions, rapid development, and a growing recreational interest in fish and wildlife brought about this statute, and the issue became how to balance development with protection for those specific river resources (Krause, 1988). Each designation is unique, depending on the qualities that led it to be considered, but designations have been controversial, with property rights being the most critical issue. As a result, by 1992 only 11,276.6 miles of rivers had been classified as wild or scenic under this statute, out of an estimated 3.6 million U.S. stream miles (Palmer, 1993).

The National Trails System Act (P.L. 90-543) provides for a national¹⁸ system of both scenic and recreational trails. Scenic trail designations are based on the potential for conservation and enjoyment of nationally significant scenic, historic, natural, or cultural qualities of the landscape through which proposed or existing trails pass, but relatively little funding has gone into the program. This program has not been as controversial, because designations, such as the Pacific Crest Trail in the Cascades and Sierra Nevada, have been primarily on public lands.

ISSUES IN DEVELOPING SCENIC RESOURCE MANAGEMENT SCHEMES

Scenic Resources Identification

A major question for establishing a planning and management framework for scenic resources is just what exactly they are. Given the variety of landscape types, arriving at a single comprehensive definition may well be impossible. Even the NSA management plan does not define them. For example, “scenery” as defined by the American Heritage Dictionary (Morris, 1978) is simply “the landscape,” and “landscape” is “a new vista of scenery or land.” Scenic resources are variously referred to as visual resources, scenic beauty, or just plain scenery.

In terms of scenic resource identification, most of the definitive work has been landscape assessments of natural environments done by land and resource management agencies, such as USFS, BLM and NPS, all of which employ various expert planners, landscape architects, foresters, and cultural resource specialists. Their efforts have centered mainly on the specific landscape attributes, such as presence of and type of vegetation, amount of cover, and water. Models have also been developed

by environmental psychologists which examine how arrangements of these attributes elements are important. Kaplan et al. (1972), Kaplan and Kaplan (1978), Ulrich (1983), Altman and Wohlwill (1983), and Knopf (1987) have approached landscape aesthetics from the perspective of perceptions, feelings, behaviors and responses, and making sense of what is being viewed. Attempts to determine what these arrangements are and translate them into management schemes, however, have not been standard agency practice (Brown et al., 1986).

Identification of scenic resources is central to the development of any system devised to manage them. This issue relates not only to what they are, but who in fact defined them. With regard to landscape evaluation, Schauman (1988) states that evaluation indicators should always include a technical component and a public input component. Penning-Rowsell (1981) states that we need to identify what people believe are the facets of landscape variety rather than what the researcher, the planner, historian, and the landscape architect think.

The Policy Development Framework

Statutes exist that require consideration of scenic values. But such consideration is most often part of a larger scheme to plan for and manage lands and resources to serve multiple interests. Analytical tools exist in various land and resource management agencies for development of management frameworks for scenic resources.

Dudley (1990) states that any successful resource management scheme has to be characterized by three key components:

1. Rational planning, which relates to both mission and jurisdiction: Which lands and resources require special management? and: Why should it be done by the public sector?

2. Development of a management framework that provides:
 - a. criteria for identifying lands needing multiple resource management;
 - b. generic principles and standards for such management; and
 - c. a geographic and administrative structure for such management; and
3. Implementation of the management framework.

The first two of these are relevant to this research.

Dudley's notion of rational planning and framework development relate to the question of how to solve problems rationally. Forester (1989) outlines the rational-comprehensive position with regard to planning—that decisions are based on a well-defined problem, a full array of alternatives and information about each, full baseline information, and full information about the values and preferences of citizens.

Consistent with elements of Forester's (1989) model NFMA and FLPMA required the USFS and BLM respectively:

- to engage in land use and other resource planning based on the best available scientific information;
- to inventory resources;
- to balance economic benefits and costs;
- to include measures for environmental protection; and
- to involve the public in the planning process.

These statutes, in conjunction with NEPA, required that planning include other multiple use values besides commodities production.

Planning, however, has long been described as occurring in a bounded rationality atmosphere, where policy-makers have incomplete information about baseline conditions; the range and content of values,

preferences, and interests; and the consequences of alternatives (March²¹ and Simon, 1958). These were major issues in the NSA, as planners examined what resources needed protecting, and why.

It is Dudley's second key component that is the main focus of this research. The management framework and the process of developing it were central concerns of gorge planners. Daniel (1990) identifies three problems in addressing scenic resources and attempting to include their management in multiple use schemes:

1. Environmental planning and management systems were already well established, with the framework largely determined by the more traditional commodity resources; scenic resources management had to be added on and integrated into this established context.
2. Existing policies and procedures emphasized quantification and objectivity, again relating to commodity production. Scenic resource assessments had to be taken from the realm of individual subjective judgment and placed into an objective framework so that their value could likewise be quantified.
3. Whether economic or amenity benefits are the goal, the primary means for implementing resource policies is to manipulate biophysical features of the environment. Scenic resource assessments had to be able to relate these manipulations in the environment to changes in scenic beauty.

Brown et al. (1986) state that bridging the gap between aesthetics and management will occur only if it is possible to translate aesthetic analysis into a form compatible with the systems currently used in making larger landscape decisions, and if such translation merits the confidence of the landscape manager. The use of existing analytical tools and existing land use schemes was an important consideration in developing the management framework for the NSA.

Most of the important lands and resources management statutes mention the need to address scenic resources and scenic values in some

fashion, but scenery, if specifically mentioned, is always included in a shopping list of values along with more tangible historical, ecological, cultural, and recreational values. These values are usually listed after the need for goals and objectives relating to multiple use and sustained yield. Even with these mandates, it is difficult to incorporate a scenic resource management framework into already established environmental planning and management systems, as Daniel (1990) points out. Both the USFS and BLM have developed analytical and planning tools specifically for visual resources, but conclusions about their application relate directly to public attitudes (which are often hard to measure and vary from place to place), differences in values between regional and national constituencies, internal organizational needs, and external political demands and pressures (Cortner and Schweitzer, 1983; Mitchell et al., 1993; Schindler et al., 1993). NPS management is given the same review (Bratton, 1985). This makes the establishment of a new federal reserve type—national scenic area—all the more interesting, from a governance standpoint.

The Role of the Expert

Key issues are the roles experts and the public play in establishing a planning and management framework. Innes (1990) states that experts play many roles. They are involved in professional inquiry. They are creators, organizers, disseminators, and interpreters of information. They are articulators of values, and they are involved in negotiations aimed at resolving policy concerns. They may be policy analysts, but may or may not be separate and apart from the role of policy-maker. They play a critical role in the determination of what needs to be

measured and whether or not all the relevant factors have been included²³ for consideration.

In this case, landscape experts were gorge planners who would also be involved in implementing the management plan. Landscape experts can generate perceived environmental quality indices that establish prevailing landscape quality levels for specific settings (Craik, 1983). Given the difficulties in understanding (let alone managing) scenic resources, this suggests that the influence of experts in defining and interpreting scenic resources is dominant.

Rose (1989) states that no one can be an expert in all things necessary to enjoy a good life, and as such we rely on experts in the delivery of public services. He goes on to state that laws and expertise tend to dominate the allocation of public resources, and that when resources are given to programs that are complex and not well understood by the public, there is little choice but to rely on experts for assistance.

The Role of the Public

Paehlke (1990), in his discussion of environmentalism and democratic practice, states that expertise is relevant to environmental decision-making, but that it is not sufficient. Effective decision-making must involve both the expertise and the views of those who are most affected by the decisions to be made. Innes (1990) states that knowledge is not the exclusive province of experts, that knowledge represents a negotiation between the more "expert" knower and the participants in the world, and that there is a subjective element in all knowledge.

Most resource management legislation requires public participation,²⁴ and an extensive public input process was undertaken in the development of the management plan for the NSA. The question becomes how to elicit responses about scenic resources during a public participation process.

Willard (1980) states that the experience of natural beauty is a relative affair, conditioned on the kind and adequacy of sensory receptors, imagination, emotional temperament, contemplative capacity, age, education, knowledge of the functions of natural objects, and the aesthetic standards and tastes of society. He concludes that the majority of people spend little or no time, effort, or money to appreciate the aesthetic possibilities of nature. It is for these reasons that policy makers often do not address the management of scenic resources or find it extremely difficult to do so. What the NSA stakeholders identified as scenic resources is important, in terms of the intensity of feelings about such resources vis-a-vis other resource values and constraints.

Willard (1980), Porteous (1982), and Brown et al. (1986) place great importance on the need for education about aesthetics, or else informational and functional needs of humans related to aesthetic qualities go unmet, and aesthetics remains a rather elitist pre-occupation.

Iacofano (1990) states that in public involvement programs, the degree to which technical expertise and community values can be integrated into final decision-making may be a factor in determining the success of such programs. However, he also cites technical complexity of

issues as a major problem. The issue of technical complexity was a huge²⁵ issue for gorge planners from the beginning of the planning process.

Differences in Public Values

Developing a management framework not only involves affording the public opportunities to provide input, but also requires that these interests be considered. The gorge was no exception, with the early establishment of stakeholders with multiple interests.

Iacofano (1990) in his literature review also lists several problems in conducting a successful public involvement process. Among these are: multiple constituencies, low public confidence, technical complexity of issues, and decision bias. The presence of multiple constituencies often results in a tendency to adhere closely to established mandates, and may further result in low public confidence.

Francis (1990) discusses a social psychological model in natural resource management theory that looks at who holds what environmental values and what the implications of these values are for the larger political community. In this context it is expected that public input on scenic resources will differ in content among various stakeholders. For example, Stone (1988) states that people respond differently to bads and goods, and are far more likely to respond around a threatened or actual loss than around a potential gain, suggesting there may be differences in values depending on whether those who participated are directly affected by NSA regulations, or perceived themselves to be. Francis (1990) also discusses an elite-hierarchical model of natural resource politics, wherein allocative benefits principally benefit an elite that may or may not be located near the resource. Stone

(1988) characterizes this as a distinction between objective interests, which actually impinge on people, and subjective interests, which people think affect them.

Porteous (1982) provides a useful synthesis of the variety of philosophical and methodological approaches to aesthetics. His model suggests that comments and participation are based on relevance, the immediacy of the need to address current environmental problems, and rigor, which refers to scientific theory-building and testing. The level of each depends on the interests of the “publics” he describes as environmental activists, social researchers, planners, and the public-at-large. The analysis of comments is expected to provide some insight into the balance between relevance and rigor as it relates to protection of the NSA’s scenic resources.

Brewer and deLeon (1983) state that one needs to appreciate the role of ideology and values in politics in understanding how alternatives are developed, presented, and decided upon. Central questions relate to the determination of goals and objectives and the generation of alternatives, and how public input was used in the selection of alternatives that became management plan policies and objectives for scenic resource protection. The research includes an analysis of general management alternatives developed for public review.

Baum (1980a; 1980b) comments on the need for political interaction in developing policy by stating that there is a disjunction between planners’ perception of their own goals and expertise and their power to bring about implementation. A major obstacle in the policy-making context is the fact/value dilemma—successful implementation can be

achieved only through the political process in which shared values are²⁷ created and then logically connected to facts generated by social science research (Rein, 1976). Willard (1980) states that people often can agree on the aesthetic value of natural things, that when there is disagreement people can give reasons for their positions, and that it is possible to establish generally accepted criteria for aesthetic worth. This is important in the ultimate understanding and acceptance of the “value” of scenery in the gorge, because Ridout (1988) states that it is difficult to apply this model to the management of scenic beauty.

A review of the literature suggests a number of concepts that are relevant to a case study on scenic resources:

- a working definition of scenic resources has not been articulated;
- given vague notions about scenery, management plans for areas with a scenic management objective may not include much in the way of policies indicating its importance;
- the public’s understanding of scenic resources may be more implicit than explicit, because aesthetics are not given much thought by the public, and this may be evident in an analysis of public input; and
- even with an adequate public involvement component, scenic resource policy will still be developed by experts.

Chapter III

HYPOTHESES AND METHODS

The previous chapter on the review of the literature highlighted several questions that are the focus of this research. The main thrust in answering these questions is to describe the process of developing scenic resource policy, the substance of the policies themselves, and the interaction between the two. To assist in this regard, policies from other areas with scenic resources also were examined. For the NSA, the focus was on scenic resources, as opposed to the natural, recreational, and cultural resources that were also the subjects of NSA management plan policies. The analysis was specific to development of policies to manage scenic resources, rather than an analysis of the effectiveness of what is contained in the NSA management plan and whether or not implementation has been successful.

This research assumes that because the Columbia River Gorge has been designated a national scenic area, in fact the scenic resources of the gorge are important enough to protect and manage. A discussion of the political events leading up to the passage of the Act can be found in Abbott et al. (in press).

The literature on scenic resources contains few studies on the process of developing policies to protect scenic and visual resources. A prevalent theme is the shortcomings of agency approaches to visual resource documentation and management, due primarily to a lack of public understanding and appreciation about how they should be protected and managed. This in turn stems from the lack of an adequate definition of scenic resources, whose dimensions and value are based on subjective individual experience.

As a result, mandates for management of public lands and natural resources mention scenic values with a host of other required resource considerations. The literature suggests that scenic resources are given short shrift because they are too complex to identify, not to mention that their protection often conflicts with other more tangible resources available on public lands. Multiple use management systems continue to be dominated by economic considerations, which makes sense from a political standpoint, because the public can realize (in immediate economic terms) the values it receives from public lands. The traditional policy response has been one of command-and-control schemes, the hallmark of the technocentric management paradigm, aimed at consumptive resources. As stated earlier, technocentric management is resistant to both the consideration of non-consumptive resources such as scenic amenities, and to lay opinion about how resources should be managed in a multiple use situation.

Conclusions of Ridout's (1988) study of whether scenic beauty was a feasible subject of regulation were that participants complained about

the “subjectivity” of the resource, and that scenic resource management³⁰ was a tough political sell in a climate that favored less regulation and greater local control. The subjectivity issue is central to the process of scenic resource policy development because of what Rein (1976) refers to as the fact/value dilemma, whereby facts obtained through research are logically connected to values that inform the policy process. It is the political process of interaction/participation rather than the power of documentation and isolated technical work that leads to success in subsequent policy implementation (Rein, 1976; Forester, 1989).

The management plan for the NSA contains four sets of policies that address the protection of scenic resources:

- overall scenic protection and enhancement that apply to all new proposed developments;
- landscape settings, which are combinations of land uses, landforms, and vegetation that distinguish an area in appearance and character from other NSA areas;
- key viewing areas (KVAs), which are important public viewpoints that offer opportunities to view gorge scenery; and
- open space, designated in part to provide special protection for sensitive scenic resources.

Policies from any one or a combination of these may apply to activities in the NSA, not to mention other policies for specific lands designated for forestry, agriculture, residential or commercial uses. These latter policies were a combination of best management practice regulations and traditional zoning requirements. The scenic resource protection policies added a new set of considerations with a more visionary purpose, and the debate centered on why they were necessary, how they would be applied, and who was qualified to judge the merits of proposed changes to the landscape.

Hypothesis 1: Scenic resources are managed by way of schemes that focus on management of other resources.

This hypothesis focuses on the “how” of scenic resource management. The protection of a scenic landscape in an unspoiled state would require a purposeful political decision for continued non-alteration of the landscape, such as for a wilderness area. Protection of scenic resources in this scenario is unlikely, given pressure for commodity development and the need to tread lightly with any owners of private property. However, landscapes with varying degrees of development and other resource uses are managed with a visual resource component.

The literature suggests that scenic resource management is difficult at best to understand and implement. Management of scenic landscapes is usually accomplished by focusing on complex interactions between physical elements of the landscape, such as vegetative types, topography, the amount of cover, and the presence of water. By identifying these landscape dimensions, objectivity and predictability may thus be built into a management scheme. These schemes, however, may be driven by other resource values, such as those associated with recreation. In this context, manipulation or alteration of the landscape revolves around its cultural usage, rather than on decisions for non-use.

Opie (1983) states that the visual experience is the number one activity at national parks, and looking is tied directly to recreating. Brown (1983) states that certain specific experiences are linked to specific settings depicted along the recreation opportunity continuum. Landscapes are not preserved for the sake of the landscape, but because viewing it gives us pleasure, which re-creates us. The relationships

between activities, settings, and experiences are deemed the relationships of concern when considering the effects of changes in visually aesthetic resources on visitor experiences.

Scenic resources are non-consumptive resources in the sense that using them does not physically alter the landscape, but they are “consumed,” in economic parlance, when the landscape is viewed, and this consumption is primarily as a recreational resource. Thus, the argument can be made that scenic resources are in essence recreational resources. The question can also be stated as: Are other resources managed as the method for managing scenic resources, or are scenic resources preserved as a result of other resource management efforts? Either way, scenic resources receive consideration in some fashion, but the issue is whether their management mandate is explicit or implicit. It is expected that a review of management plans for other reserve areas that contain a scenic or visual resource management component will show that management is primarily implicit. The NSA management plan will be analyzed to determine if this is also true in the NSA.

Hypothesis 2: Scenic resource policy development for the NSA management plan was primarily an expert-dominated process.

This issue focuses on the “who” in policy development. There are models of landscape dimensions the use of which is required by various laws and regulations, and these models have so far served as the basis for policy decisions about landscape aesthetics. A review of the literature suggests that this is because scenic resources are difficult to identify, they are not well-understood by the public, and in order to manage them, complex relationships among physical landscape dimensions must

be identified and operationalized. Complexity of issues tends to work against a successful public involvement campaign (Iacofano, 1990).

Development and implementation of policy based on such models is the function of assigned management agencies. The “experts” in this context were gorge planners from the two assigned agencies with backgrounds in either physical planning or in landscape architecture. Expertise in this context means the ability to identify physical dimensions of the landscape and to translate them to specific proposals for decisions about landscape alterations.

The Act included a specific public involvement mandate, and gorge planners conducted an extensive public participation process. The policy process began with the development by NSA management agencies of interim management guidelines and visual resource inventory maps, and the public involvement process began with draft management products already in place. An analysis was undertaken of the interaction between the public and NSA management agencies during the development of policies on scenic protection, landscape settings, key viewing areas (KVAs), and open space, to determine to what extent public comment shaped such policies. Given the public need to understand the mechanics of scenic resources management, the important issues are whether the public was able to articulate its values with regard to scenic resources in the NSA, and whether public comment had any affect on the process of developing policies and policy alternatives for such resources. It was expected that public concerns about the NSA would be on resources and issues other than scenic protection, or else comments would either be general in nature or question the value of policies.

Hypothesis 3: Substance and tone of comments on scenic resources will vary among gorge stakeholders.³⁴

Although many NSA residents favored protecting its scenic beauty, the focal point of support for gorge protection was the Portland metropolitan area. The literature suggests that people not living near a natural resource but benefitting from it will show greater favor for its use or protection. From this it is hypothesized that people living in the NSA may differ from those who do not in terms of how they feel about scenic resource protection in the NSA. The literature also suggests that people respond more around a threatened or actual loss than around a potential gain, and this may also be evident in the comments made on the management plan based on location of residence.

Interest groups are important in the policy-making process, and one role of policy-makers is to reconcile the conflicting interests of organized constituencies. Interest groups are often the most articulate and specific when it comes to making comments, especially if there are collective threats to the particular interests around which the groups were formed. Because of the diversity of resource issues in the gorge, and the fact that at least three interest groups were formed around those issues, interest groups were included as a specific "public," and their interests and the way these are stated may be different than those of the general public.

Another set of concerns about scenic resources protection deals with the implementation of a management scheme. Management plan implementation authority for the NSA rests with the NSA counties, and it was expected they would have a great deal to say about scenic resource protection policy from an implementation standpoint. There were also agencies at the state and federal level who would have no direct stake in

implementation but whose missions might be impacted by protection policies. Entities responsible for resources or land management may offer yet another perspective on the merits of scenic resources protection policy.

It was expected there would be differences in comments made among NSA stakeholders based on where the respondents lived, if the issue was paramount to an organized interest, and if there were implementation responsibilities involved.

METHODS

Research into the process of how scenic resources policies were developed for the NSA was conducted using a case study approach. The NSA was chosen for research on scenic resources because its establishment is a contemporary phenomenon, and because it is the only national scenic area in the United States with a specifically legislated emphasis on scenic and other resource protection. This latter point differentiates it from other scenic areas in the country.

Feagin et al. (1991) define a case study as an in-depth multi-faceted investigation, using qualitative research methods, of a single social phenomenon. Yin (1989) describes a case study as an empirical enquiry that:

- investigates a contemporary phenomenon within its real-life context, when
- the boundaries between phenomenon and context are not clearly evident, and in which
- multiple sources of evidence are used.

Yin also states that a case study is the correct mode of investigation if the following conditions are met:

- “How” and “why” questions are asked, as opposed to “who,” “what,” or “where” questions;
- The investigator has no control over actual behavioral events.

The hypotheses outlined above can be easily translated into “how” and “why” questions:

- How are scenic resources managed? How were scenic resource management schemes developed, and what do they contain?
- How was scenic resource policy developed for the NSA, and why did it turn out as it did?
- How did identifiable stakeholders respond to proposals for scenic resources in the NSA?

Data Sources

The primary sources of research material were the administrative record built during the development of the NSA management plan and the management plans for other federal reserve lands with a stated scenic resource management mandate. The administrative record for the development of policies is located in the Columbia River Gorge Commission (CRGC) office and the USFS NSA office.

An analysis of the NSA management plan and management plans for other reserve areas with visual resources (Lake Tahoe Basin; East Mojave National Scenic Area; Mono Basin National Forest Scenic Area; Cascade Head Scenic-Research Area; New Jersey Pinelands Reserve) was done in order to address the first hypothesis. Amenity values such as visual resources have been getting more and more attention and new ways to address them have presented a challenge to policy-makers. Application of traditional models, such as those developed by USFS and

BLM, appears to be the technique used. As stated earlier, these models³⁷ focus on physical characteristics of the landscape as a framework for management.

The administrative record includes the following types of information, the analysis of which is the basis for discussions of the second and third hypotheses outlined above:

- Descriptions of agency development of the public involvement process;
- Draft documents that were used at various public forums;
- Summaries of comments received from key community contact meetings and open houses in response to general policy alternatives;
- Development of numerous drafts of agency policies for scenic resources;
- Comments received in response to drafts of specific policies for scenic (as well natural, cultural, and recreational) resources;
- Summary minutes of all CRGC meetings 1) where development of agency management plan policies were discussed; 2) that were workshops on final draft policies; and 3) that were public hearings; and
- Comments received in response to the release of the draft management plan and the final draft management plan.

In order to address the second hypothesis, a chronological record of the development of policies relating to scenic resource protection was assembled from agency files. The Act classifies NSA lands as general management areas (GMAs) and special management areas (SMAs), with policies to be developed for each. The public record was much more detailed for GMA policy development than for SMA policy development. After a preliminary review of both the NSA management plan and the comments on the plan, it was decided that comments on open space designations, key viewing areas, and landscape settings would also be

analyzed in addition to those relating to scenic resources. Landscape settings, key viewing areas (KVAs), and the use of open space designations are the primary management framework tools used to protect and manage scenic resources in the NSA.

Scenic resource policy was developed in several stages, with both the public and the CRGC commenting on agency policy drafts. The process of determining what influence public comment had on the development of scenic resources policy began with the development of a chronology of how policies for landscape settings, KVAs, and open space came about. A record of CRGC staff reports, CRGC meeting minutes, and public comments was made for each policy strategy. With the interim guidelines as a starting point (by definition, agency-generated), successive policy drafts were compared to previous drafts for evidence of changes made after public and CRGC reviews. Agency documents and responses along with drafts of policy changes indicated what affect public comment had on the various draft plans.

As a starting point for the analysis of what the public had to say about scenic resources, all public responses and the language of scenic resource policy drafts were reviewed. As stated earlier, scenic resource management in the NSA was to be accomplished through policies on landscape settings, KVAs, open space, or scenic resources protection, and any responses mentioning any of these were set aside.

Each of the responses and policy drafts was manually content-analyzed. The content analysis process was patterned after that described by Weber (1985), utilizing a set of coding procedures to make valid inferences from text about the senders' messages. Content analytic

procedures are well-suited for text of transcripts of human communications, and yield unobtrusive measures that affect neither the sender nor the receiver of the message (Weber, 1985).

Content analysis was done using sentences as the recording unit, although words and phrases were looked at carefully as well. Weber (1985) states that the smaller the recording unit, the greater the stability and accuracy and the smaller the chance for coding error. A similar approach was used by both Ridout (1988) and Sabatier and Jenkins-Smith (1993). Ridout, in her study on scenic beauty issues in Wisconsin, gathered information on policy development participants using interviews, recordings of agency meetings, public records, reports, correspondence, and agency responses. Sabatier and Jenkins-Smith focused on subsystem actors, advocacy coalitions and policy brokers, and the belief systems held by policy elites in their longitudinal study of changes in participants' beliefs in the development of environmental policy for the Tahoe Basin. They subjected comments from 11 identified decision points in a 21-year period to a content analysis.

The purpose of the content analysis at this point was to

- develop an idea of the importance of scenic resource management strategies to the public by using counts or frequencies, which Morgan (1993) states can be used as a prelude to location of patterns in the data and their interpretation; and
- determine if public concerns about the details of such strategies resulted in changes to them during the policy development process.

As a measure for the latter, language in drafts of scenic resource policy documents was compared with previous drafts after major public input

milestones. Insight into the reasoning for changes (or lack thereof) came⁴⁰ from CRGC meeting minutes and from CRGC policy memoranda.

To address the third hypothesis stated above, all public responses with references to scenic resource protection, landscape settings, KVAs or open space were categorized by the commenter's place of residence (gorge or non-gorge resident) and/or the commenter's affiliation (e.g. agency official or interest group representative). These differentiations were based on Porteous's (1982) description of views of aesthetics and the NSA office coding system for responding to comments. All categories were mutually exclusive.

Relevant comments were again manually content-analyzed for the purpose of determining both the substance and the tone of comments. From the substance of comments made, a set of four mutually-exclusive comment categories was developed that indicated differing levels of understanding of and involvement with the details of the management plan. These are defined in Chapter VII. The tone of comments was coded as either positive or negative, indicating whether a protection or enhancement strategy was supported or not.

To gain additional insight into the workings of the CRGC, several of its meetings were attended. While not specifically useful for a retrospective analysis of management plan policies, it nevertheless provided insight into the historical context of issues in the development of such policies.

As an additional data source, interviews were conducted with representatives of the NSA and CRGC offices during the course of the review of the administrative record, and with key individuals identified

during the review process. Individuals selected were involved in the entire NSA management plan development process, or else were practitioners of landscape management in various federal reserve areas. There was no effort made to conduct a random sample of participants.

Interviews were always informal, and consisted of asking open-ended questions. Information obtained was for clarification about both the process and substance of policy development. A list of interviewees is included in the Appendix.

Chapter IV

SCENIC RESOURCES MANAGEMENT SCHEMES

In this chapter an analysis is presented of management schemes for scenic resources for several federal reserve lands with stated scenic resource mandates. Information is presented from the management plans for such lands, and their management strategies are compared and contrasted to see how prominent scenic resources are in the management of these areas. This was undertaken to test one of the stated hypotheses for this research—the relationship between scenic resource management and management of other resources.

SCENIC RESOURCE MANAGEMENT IN OTHER RESERVE AREAS

The whole concept of visual resources and their management has been one that has troubled lands managers as they attempt to reconcile mandates and public values. The literature suggests that visual resources mandates are difficult to deal with because scenery and scenic resources are difficult to assess and articulate, meaning that development and implementation of schemes are not given much attention by policy makers or are assigned a low priority.

A review of the management plans for several areas established primarily or partly for the purpose of protecting scenic resources reveals

a number of similarities in the approaches taken, as well as a similarity⁴³ to what was developed in the NSA management plan. Important areas that include a scenic resource mandate include the Cape Cod (Massachusetts) National Seashore (CCNS), the Cascade Head (Oregon) Scenic-Research Area (S-RA), the New Jersey Pinelands Reserve, the Lake Tahoe Basin, the East Mojave (California) National Scenic Area (EMNSA), and the Mono Basin (California) National Forest Scenic Area (NFSA). A comparison of some of the specifics of these areas is presented in Table 1.

Cape Cod National Seashore

The Cape Cod National Seashore (CCNS) in Massachusetts was established by P.L. 87-126 in 1961 to protect outstanding natural, cultural, scientific, scenic and recreational resources, and to assure future generations opportunities to enjoy them. The relevance in the present context is not the area under management nor the scenic values of Cape Cod. Rather, it is the structure of the enabling legislation, which allowed for what was an innovative method of site specific federal land use control. The Secretary of the Interior, through the threat of condemnation, can control the content of local zoning ordinances as well as local enforcement of land use decisions. This has since become known as the “Cape Cod formula,” and its constitutionality has been tested and upheld. The formula suggests dissatisfaction in some quarters with the ability of local governments to preserve natural resources, and the result was a scheme for preserving portions of the

Table 1
COMPARISON OF SELECTED RESERVE AREAS WITH A SCENIC RESOURCES MANAGEMENT COMPONENT

Area	Year Estab.	Legis/ Admin. Desig.	Large or Small Area	Scenic Resources Listed?	Number of States Involved	Develop- ment Pressure	Ratio of Public to Private	Manage- ment Agency	Advi- sory Body?	Land Acquisi- tion?	Imple- ment. Level	Federal Enforce- ment?	Primary Management Tools for Resource Protection
Cape Cod National Seashore	1961	L	S	Yes	One	High	60/40	NPS	No	Yes	Local	Yes	Traditional Zoning
Cascade Head Scenic-Research Area	1974	L	S	Yes	One	Low	47/53	USFS	Yes	Yes	Federal	N/A	VQOs Vegetation Management Access Control
Pinelands National Reserve	1980	L	L	No	One	High	?	Pinelands Commission	No	Yes	Local	No	Traditional Zoning Voluntary Compliance Equivalency Provision Compensation for Lost Revenue
Tahoe Basin	1980	L	L	Yes	Two	High	75/25	TRPA/USFS	Yes	Yes	Local	No	Traditional Zoning VQOs Environmental Threshold Carrying Capacity
East Mojave National Scenic Area	1984	A	L	Yes	One	Low	87/13	BLM	N/A	Yes	Federal	N/A	VRM Classes Wilderness Study Analysis
Mono Basin National Forest Scenic Area	1986	L	S	No	One	Low	99.5/0.5	USFS	Yes	Yes	Federal	N/A	VQOs Vegetation Management
Columbia Gorge National Scenic Area	1986	L	S	Yes	Two	High	30/70	CRGC/USFS	No	Yes	Local	Yes	Trational Zoning Open Space VQOs Minimum Acreages Key Viewing Areas

seashore with local enforcement by a federal agency—essentially federal⁴⁵ zoning in the form of indirect federal control.

Thomas (1985) states that the predominant theme of regulations is preservation of natural and scenic features of the seashore. Preservation was mandated by means of acreage, frontage, and setback requirements, typical of local zoning codes. Undeveloped areas were to be protected in their natural condition, and commercial and industrial districts were prohibited. There were also provisions for fee simple acquisition of lands, although Thomas (1985) states that privately owned land was a desired element of the legislative design of the seashore. The intent was to preserve the status quo of the percentage of improved lands that existed at the time of the seashore's creation.

The CCNS act requires only that preservation and development must be promoted in accordance with the intent of the CCNS act. What is interesting is that neither the legislation nor its legislative history elaborate on what is meant by the phrase “permanently preserved in its present state” as it applies to the CCNS, which is used in section 7(b)(1) of the CCNS act. In fact, the write-up of a 1992 conference on management objectives for the CCNS states that the legislation does not even offer a clear statement of purpose for the seashore (National Park Service, 1993). However, no development is allowed in the CCNS that is incompatible with the preservation of unique flora and fauna or the prevailing physiographic conditions, similar to the mandates of the NSA Act. This has ensured that any changes to the scenic landscape have been small.

In terms of scenic protection, Thomas (1985) states that the application of the Cape Cod formula has been mostly successful. However, for political reasons, the CCNS act does not require mandatory periodic review and updating of local zoning laws nor does it have a mechanism to regulate inconsistent uses adjacent to CCNS boundaries, and these have produced problems. There is no way to adapt to new land use trends in the CCNS which would otherwise be allowable. There has not been a way to control commercial and industrial uses bordering the CCNS; solutions such as the use of easements, transfer of development rights or the acquisition of a less-than-fee interest have not been possible because funds have not been appropriated for such purposes.

Relation to the NSA Act. There are parallels between the provisions in the CCNS legislation and the NSA Act. The Cape Cod formula was not considered when the governance structure for the NSA was developed, but management by the CRGC on non-federal lands in the absence of local ordinance development carries a similar notion of intervention by a higher jurisdiction. The provisions for land acquisition between the CCNS and the NSA are similar as well. Major differences are the amount of private land involved and the absence in the Act of any mention of condemnation of improved lands for failure to comply with established standards.

Cascade Head Scenic-Research Area

Cape Cod is a small area where considerable development pre-dated attempts to preserve natural and scenic features, and where development pressure remains intense. There are other small areas that

have been set aside partly for scenic purposes where development pressure has not been great. The Cascade Head Scenic-Research Area (CHS-RA) on the central Oregon coast is one example.

The CHS-RA was established by P.L. 93-535 in 1974, and it contains 9,670 acres in Oregon's Lincoln and Tillamook counties, of which about 53 percent is privately owned. The rest of the land is in the Siuslaw National Forest, managed by the USFS. About 77 percent of the CHS-RA is commercial forest land.

The general purpose for the legislation was to provide present and future generations with the use and enjoyment of certain ocean headlands, rivers, streams, estuaries, and forested areas, and to promote a more sensible relationship between humans and the existing environment, in addition to protecting the area for research and scientific purposes. All of four identified subareas were to be managed to maintain (in part) scenic values, and scenic values are listed first in three of the four.

The final EIS on the CHS-RA management plan states that it is appropriate to establish the visual landscape as a resource to be treated as an essential part of the land when considering other basic land uses (U.S. Department of Agriculture, 1977), yet it lists and discusses visual resources last in a chapter on ten basic resource types.

Visual quality objectives (VQOs) were developed based on areas seen from travel routes and people's concern for scenic quality. All CHS-RA lands were given a VQO of either partial retention, retention, or preservation, meaning that at a minimum proposed activities had to remain visually subordinate to the characteristic landscape. Most of the

area was given a VQO of retention, which provides for activities that are⁴⁸ not visually evident.

The main sub-area management tools proposed were voluntary limitations on human use, primarily to protect ongoing research efforts; limitations on additional public facilities; and maintenance of vegetative patterns in identified naturally-established landscapes. The plan states that the USFS would work with individual landowners and acquire full or partial interest in lands to protect the public interest in scenic values (U.S. Department of Agriculture, 1977). To accommodate existing development, some facilities that did not meet visual objectives were grandfathered into the management plan guidelines.

The draft EIS on the CHS-RA management plan received 65 comments from 52 respondents, and visual resources were only mentioned twice. One was a concern about the visual impacts of a proposed roadside information stop, and the other was about the future status of the Cascade Head Scenic Area, a USFS administrative designation on 250 acres which existed within the CHS-RA at the time of its designation. There were no stated concerns about management proposals to preserve most of the 9,670 acres.

Relation to the NSA Act. The USFS is involved as a management agency in both areas, and the agency's visual resource management system was used for visual resource assessments. Land acquisition programs are also available in both areas.

Mono Basin National Forest Scenic Area

The Mono Basin National Forest Scenic Area (MBNFSA) was established by Title III of the California Wilderness Act of 1984 (P.L.

98–425). It covers 76,703 acres of land within the Inyo National Forest,⁴⁹ and the 41,600 acres of Mono Lake. Less than one-half of one percent is in private ownership. The primary impetus for designation was the protection of California water rights, but the legislation did require the preparation of a management plan for the area to protect its geologic, ecologic, and cultural resources. Despite its scenic area designation, scenic values are not mentioned in the congressional findings.

Section 303(b)(2) of the legislation states that any development or proposed development on private property that differs significantly from that existing at the time of the legislation shall be deemed detrimental to the NFSA. Similar to the CHS–RA, existing development was grandfathered in.

The management plan includes language on visual resources that is general in nature. For visual resources, established VQOs would be the standard against which any proposed activities would be judged (U.S. Department of Agriculture, 1989). Meeting or exceeding the VQO of partial retention (visual subordination) is the general prescription for all lands, and there are compatibility standards for existing and new developments. The development of viewshed analyses and plans and pursuance of opportunities to relocate, remove, or underground overhead utility lines were listed as action items. There is a land acquisition program, although the amount of non-public land is very small. Visual quality values are the fifth of seven criteria that would be applied to each parcel.

Relation to the NSA Act. The USFS is involved as a management in both areas, and the agency's visual resource management system was

used for visual resource assessments. Land acquisition programs are also available in both areas.

Lake Tahoe Basin

Larger areas have also been established or designated for reasons that include the management of scenic resources. The Lake Tahoe Basin in the Sierra Nevada on the California–Nevada border is an area with outstanding scenic beauty, and because of its scenery in addition to its year-round recreational opportunities, it is also an area with severe development pressures. The Tahoe Basin consists of more than 500 square miles, 191 of which are the surface area of Lake Tahoe. It is more challenging to inventory scenic resources and then to develop and implement a plan to manage them, primarily because of the size of the basin and the large number of scenic vantage points. Today, almost 75 percent of the basin is in public ownership, but this includes only about a third of Lake Tahoe's shoreline, within a 2-mile radius of which has occurred most of the basin's development.

The Tahoe Regional Planning Agency (TRPA) was given the responsibility in 1969 for regulating land use activities. The Tahoe Regional Planning Compact (P.L. 96–551) was enacted by Congress in 1980 in order to maintain "the significant scenic, recreational, educational, scientific, natural, and public health values provided by the Lake Tahoe Basin," upon which the social and economic health of the region depends. The new legislation directed the TRPA to

establish environmental threshold carrying capacities and to adopt a regional plan and implementing ordinances to achieve and maintain such capacities while providing opportunities for orderly growth and development consistent with such capacities.

The general thrust of this legislative policy is strikingly similar to that of⁵¹ the NSA Act, although landscape settings in the gorge were not designed to specifically address the issue of environmental carrying capacity. Oddly enough, it was the threat of a national scenic area proposal for the basin that led the states of Nevada and California to agree on amendments to strengthen protection efforts in the basin.

The management framework for the basin is based on a classification system developed by the USFS and the TRPA for all lands in the basin. Essentially, land was to be developed in accordance with its capacity for development, and more specifically, its sensitivity to disturbance (Fink, 1991). The result has been stringent regulation of land use, and subsequent public support for the acquisition of environmentally sensitive lands within the basin as relief for private property owners most affected by regulations.

Scenic values were first in the list of regional values to be maintained, and they were first again in the list of values for which environmental standards were needed to establish environmental threshold carrying capacities. Thresholds for various resources were developed by a team of experts, and the resulting Threshold Study Report (TSR) finished in 1982 represented broad-scale agreement about minimum levels of environmental quality (Tahoe Regional Planning Agency, 1989a).

The use of thresholds has resulted in a complex and complicated resource management scheme. The required regional plan for the Tahoe Basin consists of three parts (Orsi, 1995). The first is the code of ordinances, which spells out rules of procedure and contains enforceable

standards. Relevant to scenic resources in the code are the Design Standards contained in chapter 30. The second part is the Goals and Policies for specific activities in the basin. A required element was a conservation plan for the preservation, development, utilization, and management of the scenic and other natural resources within the basin. Included in this plan are the goals of meeting or exceeding the scenic thresholds and for improving the accessibility of Lake Tahoe for viewing by the public. There are also standards for community design contained in the land use plan, another element required by the Compact legislation. The third part of the regional plan is made up of Plan Area Statements, TRPA's version of local zoning. There are 175 areas in the basin that have developed their own lists of permissible uses, general policies and planning considerations.

The thresholds for scenic resources were developed using two systems for evaluating and monitoring the effects of development (Iverson et al., 1993). The first system was a travel route rating, where the visual character of 46 roadway units and 33 shoreline units based on views from roadways and from the lake itself was identified. The visual character was evaluated against standard rating values adopted by the TRPA, and a determination was made as to whether or not each of the units attained the threshold. Those that did not were targeted for improvement, much like non-attainment areas for air quality standards.

The second threshold system used a scenic quality rating that focused on the relative scenic quality of individual scenic resources seen from the same travel routes. Scenic quality was based on defined parameters of unity, vividness, variety, and intactness, which blended

the USFS VRM system that considers physical dimensions of the landscape with the human-need dimensions of coherence, legibility, richness, and contrast. In addition, each unit was assigned a rating for sensitivity to change based on its relative degree of vulnerability.

With regard to the efficacy of the evaluation criteria, the TRPA board found favor with the two systems because they appeared to be quantitatively oriented. However, Iverson et al. (1993) state that what were intended to be objective methods for measurement of subjective attributes were actually qualitative measures that assigned numerical values to a variety of perceived levels of scenic quality. Reliability and validity issues have surfaced in conjunction with the acceptability of the assessment methodology used. The TRPA board adopted a Scenic Resources Management Plan in 1989 to implement required scenic resource policies and goals and a Scenic Quality Improvement Program (SQIP) aimed at areas that did not meet scenic threshold criteria.

Scenic resources in the Tahoe Basin are managed from several perspectives. First and foremost are policies backed up by ordinances that contain the traditional land use and zoning tools—regulations that deal with site design and layout, building bulk and scale, materials, colors, lighting, signing, landscaping, and screening. The general standard is attainment and maintenance of scenic thresholds for individual parcels of land (Tahoe Regional Planning Agency, 1989b). At another level are the requirements contained in the Plan Area Statements, which address scenic resource issues on a community level, and which recognize the broader landscape and community characteristics as they change around the basin. Views from the

roadways and the lake represent a third perspective, and the SQIP addressed how to get areas that do not meet scenic thresholds to the point that they do. Of special interest is that views from the lake have been deemed as important as views of the lake. This indicates the importance of views from the featured water body, and is something which has no parallel for the Columbia River in the NSA. A final perspective relates to views of the lake and natural landscape from roadway entry points into the basin, representing the big picture and analogous to the management of the identified KVAs in the NSA.

Iverson et al. (1993) state that the TRPA planning efforts hold promise of systematically maintaining and improving the quality of one of the most scenic areas in the world. They point out two potential problems, which are just as relevant in the case of the NSA. One is that no plan, no matter how well it is crafted, will be effective without monitoring and evaluation. The other is the lack of an adequate methodology to address the cumulative effects of development.

Relation to the NSA Act. There are a number of similarities between the NSA and the Lake Tahoe Basin in terms of resource use, development of a management framework, government agencies involved, a bi-state commission, and regulations aimed at both conservation and preservation. This is no surprise, since the Tahoe model and its strengths and weaknesses were examined during the development of the NSA management plan. The Tahoe Basin is similar to the Columbia River Gorge in that it is a body of water surrounded by mountains, with limited space for development, and with a number of different landowners. The TRPA board is a bi-state group similar to the CRGC,

responsible for overseeing the implementation of the Tahoe regional plan,⁵⁵ as is the CRGC for the NSA management plan. Ordinances, rules, and regulations adopted by the TRPA board apply uniformly throughout the region. There are provisions for acquisition of sensitive lands, when agreements on land use cannot be worked out with property owners.

The basic approach for protection of scenic resources has been the use of traditional zoning requirements. Use of this approach recognizes that both the Tahoe Basin and the Columbia River Gorge had a history of development, but also that additional development would further decrease the scenic qualities for which the two areas were known. For the Tahoe Basin, conditions are imposed through design review and the permitting process guided by the design standard ordinance and the goals and policies of the conservation and land use elements of the regional plan. The overall standard is maintenance of the established threshold of scenic quality. For the NSA, the overall standard is the visual subordination test for development and land use in landscape settings, and how such development affects views from KVAs.

In both cases measurements of scenic quality were made by experts, which Iverson et al. (1993) believe is an implementation issue in the Tahoe Basin, and which was the subject of numerous comments made during the development of the NSA management plan. In combination with the identified environmental threshold carrying capacities, there is at least some objective data that can be used to build some predictability into the regulatory scheme. This has made the effort to preserve overall scenic quality of the Tahoe Basin easier to implement, though there still

is no adequate mechanism to consider cumulative visual impacts, as stated above.

The TRPA has the authority to adopt air quality standards that exceed state and federal standards in order to protect views in the basin, an authority not within the present legislative mandate of the CRGC and the NSA office. Air quality has been discussed by the CRGC because it is an issue in the NSA, and Oregon's Department of Environmental Quality suggested a framework for consideration of air quality in the gorge during development of the management plan.

Strong (1984) states that Tahoe has long been regarded as a scenic asset of national significance, and that it could have been one of the nation's first and finest national parks. He adds that because of the urban boom and the private ownership of prime shoreline, all aspects of environmental quality within the Tahoe Basin have declined. Of significance is that meaningful cooperation efforts between Nevada and California have largely failed, as they found themselves at odds over the necessary levels of protection. Strong mentions direct federal control in the form of a national scenic or recreation area as an untried choice, but states there is widespread suspicion of and hostility toward federal intervention. This contrasts with the situation in the Columbia River Gorge, where pressure from both inside and outside the gorge resulted in federal intervention via the NSA Act, although the states of Washington and Oregon also have different ideas about levels of protection.

The New Jersey Pinelands National Reserve

The Pine Barrens in New Jersey is the largest forested region remaining in the Boston-Washington megalopolis and contains one of

the last unspoiled major aquifers in the Northeast. Pressures for development and recreation were similar to what Cape Cod and Lake Tahoe were experiencing. Recognizing the need to protect and preserve the significant land and water resource values of the Pinelands, Congress established the 935,000-acre Pinelands National Reserve in 1978 as part of the National Parks and Recreation Act (P.L. 95-625).

Section 502(a)(6) of the legislation states that such protection and preservation shall be through a new program which combines the capabilities of local, state, and federal agencies and the private sector rather than through the traditional means of federal management and acquisition. The Pinelands Commission prepared a management plan, dividing the reserve into two zones, each with different kinds and intensities of allowed uses: a relatively pristine core and a surrounding area of graded intensities of land uses. The latter zone includes forestry and agricultural production as well as the periphery of growth centers. Implementation is through county and municipal zoning ordinances.

Lilieholm and Romm (1992) state that in contrast to more traditional protection efforts, the Pinelands Reserve model changed existing patterns of land ownership and governmental jurisdiction as little as possible. The model uses intergovernmental mixes of authority, representative and participatory mechanisms for land use planning, mixes of fiscal and regulatory measures to discourage unwanted uses, and creative compliance incentives for clearly stated public interests. These incentives include tradable⁴ development credits for landowners and payments in lieu of taxes for counties, both for lost revenues due to zoning restrictions and for public land acquisition.

Scenic values in the Pine Barrens have been touted as being of national significance since the late 1960s. The legislation makes no mention of scenic values in the Congressional findings, but did require the Pinelands Commission to assess scenic, aesthetic, cultural, open space, and recreational resources of the region as a prelude to management plan preparation. Requirements for scenic resource protection are included in the New Jersey Administrative Code. Primarily, scenic resources are addressed through the establishment of scenic corridors, the regulation of signs, and the management of vegetation. Local governments and counties must address these in their master plans and land use ordinances.

Relation to the NSA Act. An interesting provision in all the management program sections of the Pinelands comprehensive plan is that municipal programs need not incorporate the literal terms spelled out in each section. Rather, each management program section includes minimum standards that must be met, but more importantly allows alternative and additional techniques to achieve equivalent protection of the Pinelands. This latter point was a major issue at the approval stage of the NSA management plan, as there were no criteria against which to decide whether or not alternatives were at least equivalent in terms of protection of scenic and other resources in the gorge. The Secretary of Agriculture wanted the CRGC to consider this issue before giving his concurrence to the NSA management plan. The problem in the gorge would have been the major differences between Oregon's and Washington's land use planning requirements and their application, if the NSA counties had been allowed to use something equivalent to but

outside the uniformity of NSA standards and policies. This was not an issue for the Pinelands, given other applicable federal, state, and local laws, and its location within a single state.

Collins and Russell (1988) have described the Pinelands management scheme as the most successful regional land-use planning effort in the United States. The model was not used as a basis for NSA management, because of potential implementation problems.

East Mojave National Scenic Area

As a result of FLPMA, the California Desert Conservation Area was created and planning for the area began in 1976. The Desert Plan adopted in 1980 recognized the East Mojave as “a unique area of special significance,” and the result was the administrative designation of the East Mojave as a national scenic area (EMNSA) in 1980. The EMNSA covers 1.5 million acres, of which 1.3 million acres are public lands administered by BLM. Its administrative designation distinguishes it from other reserve areas.

The EMNSA management plan adopted in 1988 states that scenic quality will be managed by “attempting to limit the degree of change in the ‘characteristic landscape’ to standards which are based on scenic quality and sensitivity of an area” (Bureau of Land Management, 1988). As mentioned earlier, BLM uses VRM classes based on changes in color, form, texture, and line brought on by proposed development activities, similar to the technique used by the USFS. The plan specifically states that visual impacts will be assessed in an “objective manner by trained BLM specialists,” which illustrates who will make decisions about visual resources.

The original California Desert Plan “zoned” all multiple use lands (similar to land use zones used by county and city governments) based on resource sensitivity and land uses. Ninety percent of the EMNSA was initially “zoned” for controlled use (Class C, suitable for wilderness designation) or limited use (Class L), but the area is now managed entirely as Class C (Meckfessel, 1994). Twenty-three wilderness study areas covering one-half of the area were also included in the EMNSA management plan. Implementation was to be undertaken jointly with the County of San Bernadino and other state and federal resource management agencies, and county zoning laws apply to the area.

Meckfessel (1994) states that there was little public understanding of what a national scenic area is, partly because there was no legal definition nor any specific criteria that apply to this designation. A number of comments about the usefulness of VRM classes and even the designation and management of travel corridors were made during the public comment period for the draft EMNSA management plan (U.S. Department of the Interior, 1987). Objections to specific scenic resource provisions came predictably from utility interests, who argued that such provisions would unnecessarily preclude future utility corridors, and from mining interests, who pointed out the level of visual impacts that already existed at several mining facilities. There were also concerns about grandfathering existing structures. There were no comments about specific scenic resource protection standards, because none were included in the management proposals.

The EMNSA is a large area with expansive viewsheds and few development pressures, and the latter differentiates it from places like

the Tahoe Basin and the Pinelands Reserve. It is the part of the California desert farthest removed from the population centers of southern California. This is reflected in the almost generic nature of guidelines for protection of scenic quality. Mile-wide scenic corridors have been designated along travel routes, within which terrain and vegetation will be used to screen any development activities. Signs have to meet visual standards, wind energy development is prohibited, and new power lines must be buried if possible. Because most of the area has been considered for wilderness designation, there is little development activity beyond existing mining claims. As de facto wilderness, preserving the quality of scenic resources in the EMNSA has been relatively easy and non-controversial.

The EMNSA differs from the NSA in several respects. The EMNSA is

- a much larger area;
- much more rectangular in shape as opposed to linear, which allows easier protection of broader middlegrounds and backgrounds;
- well-removed from population centers;
- not subject to intense resource development pressures; and
- 86 percent publicly-owned, which lessens conflicts with private property owners.

This has allowed BLM to manage scenic resources within established mandates, rather than having to develop a more complex land use management scheme. The result, as stated above, has been a set of generic guidelines for protection of scenic quality that might also apply to any other BLM lands.

Conclusions

There are a number of similarities in the geographic features and management approaches for these federal land reserve areas.

Geography. With the exception of the East Mojave NSA, all of the areas with a scenic or visual resource component have a water body as either the primary landscape feature or close by. Two are coastal, and two surround lakes. Because views of natural or naturalistic scenes are desirable, there is pressure for development and/or access for recreational pursuits. Lakefront or riverfront property or property with water views is important in this regard.

The areas examined are of various sizes and configurations. Size does not seem to be a factor in establishing a scenic resource management scheme, nor is there a consistent logic to how boundaries were determined. Four are mountainous, or have at least some relief in the terrain as either foreground, middle-ground, background, or some combination of these. Two (Cape Cod and the New Jersey Pinelands) are considered greenline parks, which Belcher and Wellman (1991) describe as recreational areas with mostly private ownership, many adjacent landowners, and numerous governmental jurisdictions. The NSA falls into this category.

Management schemes. All of the management schemes rely primarily on regulation, with oversight by existing federal agencies or by regional authorities created by legislation. Scenic resources protection is most often based on the application of traditional zoning requirements (e.g. setbacks, height limitations, landscaping and screening

requirements), primarily because zoning tools are readily available to county and local governments.

Reliance on strict zoning considerations is most likely when development pressures are high. For reserve areas where development pressures are high, local governments have the ultimate implementation responsibility. For Cape Cod, this responsibility comes with the “threat” of higher level intervention via the Cape Cod formula (Thomas, 1985). Such a provision was not applied to the Tahoe Regional Planning Agency (TRPA) due to a distrust of federal oversight (Iverson, 1993), or to the Pinelands Commission (Lilieholtm and Romm, 1992). The TRPA approach uses the physical limitations of the land to dictate development activities, and the Pinelands Commission uses a cooperation-incentive approach, but both agencies have strong regulatory authority as regional agencies. Generally, the higher the pressure for development, the greater the degree of regulatory oversight, and the drafters of reserve area legislation showed political wisdom by requiring extensive planning processes, and, more importantly, shifting the onus of implementing often unpopular scenic resource protection measures to local government. Only the TRPA retains an advisory commission to assist in implementation.

Other areas have low development pressures, primarily because there is a predominance of publicly-owned or commercial forest land, or they are removed from population centers, or both. This is the case with East Mojave NSA, the Mono Basin NFSA, and the Cascade Head S-RA. In these cases, federal land managers apply visual resource management objectives with an emphasis on retaining the characteristic natural landscapes, and work with inholding property owners to gain compliance

with scenic resource protection goals. Commissions established for the⁶⁴ Mono Basin and Cascade Head reserve areas remain in effect but are advisory in nature.

Included in the legislation for all of the reserve areas is a provision for acquisition of lands deemed necessary to carry out the purposes for which the reserve was established. Acquisition may come in the form of the purchase of development rights, easements, land trades, or through fee simple means, which are standard tools available to all levels of government. In most cases such acquisition requires the consent of the property owner, and only in the case of Cape Cod was the condemnation of lands under strict guidelines authorized.

MANAGEMENT OF OTHER RESOURCES AS A SURROGATE FOR SCENERY

With the theoretical propositions that 1) scenic resources are hard to define; 2) people do not spend time contemplating nature's aesthetic possibilities; and 3) the technocentric management paradigm often ignores environmental amenities, the question becomes whether or not scenic resources management is more myth than reality. This relates to the more important question of just what purpose (or purposes) management of the landscape serves.

Does the management of other resources serve as a surrogate for management of scenic resources? Whyte (1968), for example, concludes that consideration of scenic resources and open space is primarily a tool for recreational resource management purposes. As stated earlier, viewing is the principal activity at parks, forests, and recreation areas.

As a way to help answer this question, the language of both the enabling legislation and required management plans for the areas previously discussed was examined. The legislation was checked to see whether or not scenic values were included in a list of resource considerations, and if they were merely mentioned or there was some elaboration on their importance. In addition to seeing how scenic resources are addressed, the management plans were also examined to determine how much detail and emphasis was given to them. This was determined by the placement of any discussion of scenic resources and the content of what was discussed.

Cascade Head S-RA

The legislation establishing the Cascade Head S-RA does not mention scenic resources in the findings, but rather specific physical features in the landscape such as headlands, streams, and forested areas. The CHS-RA management plan assumed that scenic resources would increase in local, state, and national importance as other portions of the Oregon coast are more intensively used by humans, and that recreational demand would also continue to increase. The primary purpose for the designation of the S-RA was a USFS research area, and, consistent with that, the maintenance of the area in a natural state. In the comparison of three management alternatives, scenic resources were not mentioned. Forest and vegetation management were the primary ways the landscape was to be protected.

Pinelands Reserve

As stated earlier, the Pinelands Reserve legislation makes no mention of scenic values. Scenic guidelines are listed tenth out of fifteen

categories in the comprehensive plan. The Pinelands has a workable management system because it seeks to balance development with preservation of specific features of the landscape, such as wetlands, agriculture and forest lands, and air and water quality, and provides a workable mix of bottom-up and top-down approaches to do so.

Scenic management in the Pinelands Reserve by definition is intended to ensure that development will take advantage of and enhance the visual character of the Pinelands. Minimal guidance is provided, relating only to signs and their placement, a setback requirement for scenic corridors, and undergrounding of new utilities. It is no coincidence that most of the lands in the reserve are private lands.

Tahoe Basin

At various times the national forests surrounding Lake Tahoe have been enlarged, and there have been numerous proposals for national park status, as well as for a forest preserve and a national recreation area. Strong (1984) states that the primary impetus for implementing land use regulations in the Tahoe Basin was the deterioration of water quality in the Lake Tahoe environment, although scenic quality is one of the main reasons for addressing land use in the Tahoe Basin.

The legislative findings for the Tahoe Regional Planning Compact address scenery by touting its importance in maintaining the social and economic health of the region, and in providing the backdrop for the outdoor recreational opportunities of the region. The TRPA has a mandate to protect scenic vistas in the Tahoe Basin, and has a detailed set of scenic protection policies based on traditional zoning requirements

to go along with the carrying capacity regulations. Its job is made easier⁶⁷ because, with USFS lands, two-thirds of the basin is publicly owned.

Because of the increasing demand for recreation in the area, the TRPA in 1993 completed a scenic resource evaluation that looked at the basin's recreation areas. The study resulted in additional criteria to be applied to permit reviews, and had the effect of tying scenic resources management directly in with management of all of the basin's recreational opportunities. Preservation of scenery is a stated objective of the TRPA, but it is the relationship between scenery and the recreational aspects of the Tahoe Basin that is the driving force behind protection of scenic vistas. Strong (1984) concludes that the demand for recreation alone precludes returning the Tahoe Basin to its earlier days of quiet beauty and serenity.

East Mojave NSA

The management philosophy in the 1988 management plan states that the NSA was designated to retain the area's unique natural scenic qualities while allowing continuation of the area's traditional uses. The plan's primary emphasis is on recreation and access. One of the management goals is to manage visitor use to encourage dispersion so as to maintain the region's character and scenic values as well as to protect resources. In spite of the scenic area designation, maintaining the region's character and scenic values was listed as the last of six management goals, and assuring scenic quality maintenance was listed as the last of seven special management provisions.

Meckfessel (1994) stated that very few people understand the concept of a national scenic area. In this context, it has been easy to rely on

existing mandates for scenic resource protection, but also because there⁶⁸ are few competing resource demands.

Mono Basin NFSA

Nowhere in the legislation for the Mono Basin NFSA does it say anything about considering the scenic values of the Mono Basin area. The focus of management activities is on non-point source water quality problems in Mono Lake stemming from water extraction and the loss of riparian vegetation (Schuyler, 1995). Enhancement of fish and wildlife resources through habitat restoration and low level recreation are given the most attention in the management plan.

Scenic resources do not seem to be an overwhelming concern in the MBNFSA, nor is there any indication that they were a major public concern. An Inyo National Forest plan monitoring and evaluation report mentions only that scenic viewpoints have been established along several highways (U.S. Department of Agriculture, 1994), and a recent statement of issues and opportunities for the forest does not mention visual resources (U.S. Department of Agriculture, 1995).

Conclusions

The review of enabling legislation and management plans for federal reserve areas with a stated scenic purpose reveals no consistent pattern in terms of how important scenic or visual resources are. Of interest is that areas identified as "scenic" may not even have as a stated purpose the fact that they are scenic. In the absence of a strong legislative mandate, federal agencies with management responsibilities have adopted standard agency policy for visual resource management, while

focusing on more pressing issues such as recreation, research, and water quality.

In areas with larger amounts of private land, management agencies have pushed varying degrees of scenic resource protection measures, but also have included mechanisms to compensate landowners, because of the difficulties of defending scenic values as a legitimate public purpose. The fact that scenic resources are not featured prominently relates both to the public's limited knowledge and interest in them in the particular area, and the difficulties in assigning a suitable value to them in relation to other resource values. This fits with the difficulty in developing suitable measures for scenic resources and incorporating them into an existing management framework.

What can be stated with certainty is that reserve areas designated as "scenic" are not necessarily managed with an emphasis on their scenic or visual resources. This suggests that the title of "national scenic area" is employed so as not to call attention to other more important resource values and concerns, yet still tout the pleasant aspects of the landscape. Such a title may be politically neutral in its connotation, which has the potential to minimize the controversy over such a designation. But, management schemes still appear to focus on cultural uses of the landscape, and scenic resources are addressed primarily as they relate to these uses.

An area of follow-up research in this regard would be an empirical investigation of the intersection between landscape dimensions, preferences for scenic views, and some demonstrated measure for importance of scenic views, such as willingness-to-pay or existence

value. More information is needed on public concern for scenic preservation, given a choice of resource policy responses in a multiple use context.

The NSA. An examination of the public record for the NSA showed that the largest number of comments on the SNCRs were about recreational resources, from those who argued that development of additional recreational resources would be detrimental to the visual quality of the gorge to those who urged that recreational opportunities be expanded so that the use of such resources would economically benefit the gorge. This comes as no surprise; people come to the gorge to recreate in large part because of the beauty of its landscapes and the inherent recreation potential. Unlike scenic resources, recreational resources are defined in the management plan; they are areas and facilities that provide recreational opportunities and experiences.

By virtue of the mandates in the Act, the management plan includes sections on both scenic and recreation resources. The connection between recreation resources and scenic resources is an important one. In the section on recreation resources, the management plan touts the magnificent panoramas, waterfalls, and rock formations that have awed sightseers in large numbers since the completion of the Historic Columbia River Highway. Some of the same management tools apply to both scenic and recreation resources. For example, open space designations (discussed in the next section as a tool to protect scenic resources) were used to protect potential and existing recreation resources, and also both Federal and state wild, scenic, and recreation waterways. Many of those advocating the use of open space wanted it to

protect both public and private lands. Though a number of people stated⁷¹ that the gorge was a national scenic area, not a national recreation area, recreational resources were clearly on the minds of commenters.

It may not matter what the particular landscape dimensions are in the gorge, or even if it is important to define them. It is clear that public use of the gorge is for recreation purposes. Scenic resources and recreation resources may require a distinction in the management plan, but in the public mind the distinction between them in the gorge is far less apparent.

The CRGC considered recreation goals and objectives early on in the development of the NSA management plan. The primary recreation identity for the gorge was deemed to be scenic appreciation, and the goal was to provide recreational access and usage that harmonized with the natural and scenic qualities of the gorge (Columbia River Gorge Commission, 1989a). Indeed, the designation of the gorge as a national recreational area was considered, but the idea was rejected so as not to over-emphasize recreational resources to the possible detriment or exclusion of the gorge's scenic and natural resources.

The chapters that follow present an analysis of what the public had to say about scenic resources and their management in the NSA. People can relate to recreational resources through the management of specific areas and activities. The question is whether they understand scenic resources and policies for their management, because it is likely that protection of the setting in which recreational opportunities are found is as important as the opportunities themselves, even though this may not be stated.

Chapter V

THE CONTEXT FOR DEVELOPMENT OF NSA SCENIC RESOURCES POLICIES

There has been discussion and debate about how to manage the gorge ever since the Historic Columbia River Highway was completed in 1916. At that point only the states of Washington and Oregon were involved in the gorge, primarily in the development of state parks. The political history of the gorge is described by Blair (1987) and by Abbott et al. (in press), and is herein given only cursory treatment.

A number of studies, reports, and resource inventories relating to the gorge preceded the development process for the NSA management plan. It is important to note not only what was done, but by whom, because much of the information on which the plan was based had already been generated and analyzed by the agencies involved.

The first comprehensive look at the gorge resulted in a report done in 1937, near the time of completion for Bonneville Dam. The Columbia River Gorge Committee of the Northwest Regional Planning Commission (NRPC) issued the report authored by John B. Yeon considering an interstate park for the gorge. The NRPC stated that gorge resources "have no protection comparable in authority or scope to the various forces which endanger them" (Pacific Northwest Regional Planning Commission,

1937). The report states that protection of the gorge under an NPS designation was not warranted because the gorge did not possess the unaltered pristine qualities found in national parks. Rather, a conservation program was needed to bridge jurisdictional boundaries and encourage proper planning to achieve protection of scenic and other values of the area. The report also recommended among other things that industry not be located adjacent to Bonneville Dam as had been envisioned, but well outside the immediate confines of the gorge to protect its scenic beauty.

There was little activity on the gorge during World War II, but Oregon and Washington created Gorge Commissions in 1953 and 1959, respectively. Their effectiveness was limited by meager funding, by the majority of members from local counties who were not receptive to any outside control, and by the fact that the commissions' roles were only advisory (Blair, 1987).

At a 1970 meeting of the Gorge Commissions and the governors of Washington and Oregon, a proposal for a Columbia Gorge National Recreation Area was discussed, and momentum began to build for greater protection of the gorge. In 1976, the gorge was identified as "a major open space and recreation resource" in a study by the NPS that looked at open space and urban parks for the City of Portland. The NPS concluded that "the geology and volatile weather of the gorge lend it a uniqueness and a scenic quality that constitute national significance" (U.S. Department of the Interior, Bureau of Outdoor Recreation/National Park Service, 1976). The fact that the gorge was considered as an urban park for Portland strengthened the notion of the gorge as part of

Portland's recreational hinterland, setting the stage for the debate over ⁷⁴ resources of local versus regional/national significance.

The 1980 Park Service Study

The most significant study done on the gorge was again conducted by the NPS. The study was requested in 1979 by the Columbia Gorge Coalition, and included an inventory of gorge resources and potential threats to those resources (U.S. Department of the Interior, National Park Service, 1980).

The study concluded in part that:

- many of the gorge's natural values are intact, but that human activities are also highly visible, and that these developments must be carefully balanced with the gorge's natural and scenic qualities;
- there are more than 50 agencies and organizations with varying degrees of jurisdictional responsibility over the gorge, and no one agency has comprehensive authority to resolve single issues or to decide the outcome of frequently competing purposes;
- there is a public interest in protecting significant natural, rural, and cultural resources adjacent to metropolitan areas; and
- the very nature of the gorge's diverse landscape requires creative administrative solutions and participation by all levels of government.

The study broke new ground in two ways. First, a landscape assessment was undertaken to determine what aspects of the gorge contribute to its scenic quality and visual appeal. Twelve characteristic landscape units were identified with the idea that specific management strategies and practices would be developed to maintain or enhance them. These were the forerunners to the concept of landscape settings identified in the NSA management plan. Also, the study team looked at administrative models in use in places like the New Jersey Pinelands

Reserve and the Cascade Head (Oregon) Scenic-Research Area, to come⁷⁵
up with four possible management models:

- Continuation of existing policies, with no change in ownership or management of lands, and the continued advisory existence of the Oregon and Washington Gorge Commissions;
- Expanding the role of the gorge commissions to assist in the implementation of their Resource Management Program and to provide technical assistance to local governments;
- Establishment of a multi-governmental commission to prepare a comprehensive plan to preserve and protect the unique values of the gorge; or
- Establishment of central federal management with authority to manage the gorge as a national recreation area, with the assistance of an advisory committee.

This study with its alternatives was clearly the antecedent to the present NSA management plan and its influence on the substance of the management plan cannot be overstated. One significant influence of the 1980 study was in determining the eventual boundaries for the NSA. Each of the four management alternatives was accompanied by a boundary recommendation. The working boundary of the Gorge Commissions was defined as the general configuration of the viewshed as seen from the river bottom. At issue was where to establish the eastern and western boundaries. The NPS study area comprised 322,000 acres, and included more area at the east end of the gorge; the NSA, as previously stated, is 292,615 acres.

What is also salient about the 1980 study in the context of the present research is that it was done by a NPS study team none of whose members lived in or near the study area. This may have been advantageous in maintaining objectivity about the issues and facts

surrounding gorge management, but the study's recommendations and⁷⁶
inventories were nevertheless produced by outside resource experts.

The National Scenic Area Act

A key issue was the level of federal protection that would result, and whether a federal agency or a regional commission would be the lead management agency. Conservationists argued that the Lake Tahoe experience underscored the failure of a regional commission with local appointees to manage a complex, bi-state natural area. Local gorge residents opposed any federal management authority. The issue was seemingly resolved with the introduction of a bill in 1985 that provided management authority to both the USFS and a regional commission, but over separate lands within the NSA. A host of other details on enforcement provisions, implementation procedures, lands acquisition, development standards, and commission voting procedures had to be addressed. These and other details are discussed by Blair (1987).

Section 3 of the Act states its two basic purposes:

1. to establish a national scenic area to protect and provide for the enhancement of scenic, cultural, recreational, and natural resources of the gorge; and
2. to protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with paragraph 1.

These goals appear to be clear and concise, and stated in hierarchical order, one of the pre-conditions for successful implementation described by Mazmanian and Sabatier (1983). However, the emphasis in the policy development process on the first goal became the backdrop for the

debate on the politics of scenery and set the context for the public involvement process.

The three land management classifications created by the Act were based on a recognition of existing land types and jurisdictions. Special management area (SMAs), which cover 115,000 acres, or 39 percent of the NSA, comprise most of the region's sensitive lands and are located mainly in the western half of the gorge. The USFS was designated the lead agency for managing SMAs, and established the NSA office in Hood River, Oregon. The agency already had a presence in the gorge through management of the Mount Hood and Gifford Pinchot National Forests, and already had experience with visual resources management.

General management areas (GMAs), which cover 149,004 acres, or 51 percent of the NSA, are non-federal lands that blanket most of the eastern end of the gorge and are predominantly devoted to traditional resource uses such as timber and agriculture. Most of the GMA is in private ownership. The CRGC, the regional commission created by the Act, has the responsibility for the regulation of activities in the GMA. The CRGC as a new entity had the unenviable task of developing regulations that applied not only to private lands but that meshed with what the NSA office was proposing for SMA lands. The CRGC located its office in White Salmon, Washington, so that each of the two states involved would have an NSA management agency office.

Thirteen urban areas totalling 28,515 acres are the third major element in the NSA. The second purpose of the Act specifies that these areas be the focus of future growth and development. About 80 percent

of gorge residents live in these urban areas, which, as an interesting twist, are exempt from NSA regulation.

Interim Guidelines

Section 10 of the Act required the USFS to develop interim guidelines for NSA management until such time as the NSA counties developed and adopted their own land use ordinances. It was at this point that the process of fleshing out the substance of the Act's two goals began. Section 6(d) of the Act lists nine standards for all land use ordinances and interim guidelines adopted pursuant to the Act.

The initial draft guidelines catered to the local perspective of being detailed and specific. The detailed guidelines were later replaced with non-specific standards, after the USFS in Washington, DC, objected to what it perceived as too much federal control over local land use. As stated earlier, this is not without precedent; a federal "stick" over local land use activity, the so-called Cape Cod formula, has been applied a number of times since it was first developed as part of the management scheme for the Cape Cod National Seashore.

Draft interim guidelines were released on April 13, 1987, and five local workshops were held. The non-specific standards were attacked locally at public hearings precisely for being too vague, and a feeling that it would simply be "business as usual" in the gorge. The NSA office adopted a set of performance standards as interim guidelines on June 30, 1987, and on August 24, 1987, the newly-formed CRGC adopted the USFS interim guidelines. From this time forward, the same set of guidelines applied to all NSA lands.

For scenic resources, the interim guidelines objective was to protect⁷⁹ and enhance scenic resources in SMAs and GMAs pending completion of the management plan. Protection was to be accomplished by:

- minimizing impacts on scenery that is viewed by the greatest number of people, i.e. key viewing areas;
- insuring that development harmonizes with and complements its surroundings, rather than contrasts; and
- avoiding dramatic changes in the landscape character where land or water uses or developments are proposed.

Ten guidelines for proposed uses and developments were included in the interim guidelines, and these are listed in Table 2.

The development of the interim guidelines is detailed by Abbott et al. (in press), who state that the process of drafting the interim guidelines consisted mainly of interactions between experts (agency planners) and implementers (local government planners). Even with the interim guidelines in place, there was much concern that they were not adequately protecting the gorge, because so many projects begun prior to their adoption were continuing to be approved. This concern loomed just below the surface throughout the process of drafting goals and policies; the question remained at what point scenic resources would truly be protected.

Scenic Resources Inventory

After the Act passed, the question of identifying what in the NSA was scenic had to be addressed before a management scheme could be developed that was consistent with the Act's first goal. Sections 6(a)(1) and 8(c) of the Act required that resource inventories be developed by the CRGC and NSA offices, respectively. These inventories were the basis on

which policies and regulations for scenic resource management would be⁸⁰ developed. Basic visual resource information had been collected from the 1980 NPS study, and served as the basis for the new effort.

Section 8(a) of the Act required the NSA office to apply its visual resource management (VRM) guidelines to its activities in the SMAs. However, given the timing and the availability of USFS expertise, the VRM guidelines served as the point of departure for GMA landscape assessments as well. Designing a visual resource inventory for the NSA was not an easy undertaking. Daniel (1990) states that it is difficult to place subjective assessments about scenic resources in an objective framework. This issue would draw much criticism as the policy development process unfolded.

Early on the NSA office recognized the difficulty it was facing in trying to set out a description of scenic resources in the NSA (U.S. Department of Agriculture, NSA office; (undated)). As a starting point, the NSA office established three goals for a scenic resources inventory:

1. The system had to be designed to be legally defensible;
2. The system had to be designed to be inherently flexible; and
3. The system had to be designed to be understood by the public.

Of interest is that public understanding is the last of the three explicit goals of inventory design.

Table 2
INTERIM GUIDELINES FOR PROTECTION AND ENHANCEMENT OF SCENIC
RESOURCES IN THE NSA

1. Proposed uses or developments shall protect or enhance the scenic resources by avoiding changes in the particular landscape setting, and/or by minimizing the impact from site-specific development.
 2. Proposed uses or development shall not change the landscape setting of a site or its immediate surroundings from an undeveloped or a rural or developed setting, or from a rural to a developed setting.
 3. Proposed uses or developments shall not detract from or impair views from key viewing areas.
 4. Size, shape, color, texture, siting, height, building materials, lighting or other features of a proposed development shall not noticeably contrast with the landscape setting.
 5. Proposed structures shall not protrude above the line of a bluff, cliff, or skyline as seen from key viewing areas.
 6. Proposed structures shall be screened from view of key viewing areas. Whenever, possible, screening will make use of topographic or other natural features and/or native vegetation.
 7. Except as necessary for preparation of an actual building site, proposed uses and developments shall not appear to modify the vegetation as seen from key viewing areas.
 8. Proposed improvements seen from key viewing areas shall be aligned, designed and sited to fit the natural topography and to minimize visible grading or other modifications of land forms, vegetation cover, and natural characteristics. Improvements would include, but are not limited to: roads, parking areas, logging landings, rights-of-way, storage areas, fences, and site preparations for structures.
 9. Proposed uses or developments in undeveloped and rural settings shall meet the visual quality objective of Partial Retention, as defined in the Forest Service Visual Quality Management System.
 10. Proposals for enhancement of scenic resources are encouraged as long as they will protect the cultural, recreational or natural resources.
-

The NSA office had a goal of going beyond previous mapping studies⁸² by mapping not only the existing visual conditions and capabilities, but also by creating manageable units for scenic resources. The result was a six-map series for the NSA that included:

- Visual attributes, showing 12 cultural landscape types in the NSA;
- Landscape diversity, showing the variety of representative landscapes in the NSA;
- Seen areas from key viewing areas, showing landscapes seen and not seen from key viewing areas;
- Landscape significance, showing the most inherently beautiful views using USFS VRM criteria;
- Visual absorption capability, showing how much modification NSA landscapes could visually absorb; and
- Landscape sensitivity, showing a spectrum of landscape sensitivity.

Gorge planners were not hindered by a lack of baseline information, a problem March and Simon (1958) identified as often plaguing agency policy-makers. The scenic resource inventories for the NSA were based somewhat on the assessment work that had been done for the 1980 NPS study of alternatives for the gorge, on what the USFS had done for the management plans for the Mount Hood and Gifford Pinchot National Forests, and on work done by other agencies. The complete NSA inventory was done by NSA office staff using the VRM system, in which certain artistic principles were applied to on-the-ground observations.

Because of the NSA office's immediate responsibilities for protection of scenic resources under the interim guidelines, the scenic resources inventory was done by gorge planners and then presented to the public. Using an existing system facilitates implementation, as Brown et al. (1986) state, but it also carries the potential to be resistant to public

comment, since results are drafted by agency experts, and usually prior⁸³ to public review.

Schauman (1988) states that landscape evaluation should always include a public input component as well as a technical component. This implies the two components might not be the same, hinting at a lack of an operational understanding about scenic resources on the part of the lay public. Was this the case with the NSA? With the interim guidelines in place, and armed with its array of inventory maps, NSA and CRGC staff began the process of meeting the public. .

Scenic Resources Identification

Prior to the October–November open houses, a joint information mailer was prepared, and 20,000 were sent to persons living in or near the NSA, NSA property owners, and to those on the mailing list. The primary purpose was to inform those with a vested interest in the NSA, and to invite them to be heard. The mailer included a description of how scenic resource inventory maps were prepared. In the mailer's section on scenic resources, the public was requested to "mark your favorite beautiful or important spots" on a centerfold map of the NSA. Thus began the education process about scenic resources deemed vital by Willard (1980), Porteous (1982), and Brown et al. (1986), and the information exchange process deemed essential by Iacofano (1990).

At the open houses, the public was presented with the inventory maps that organized and differentiated among the scenic aspects of the gorge. Questionnaires were given to participants asking for comments about the planning process and input on management of gorge resources. One hundred seven (107) were returned, and a summary of

responses was prepared. The summary overview contained several interesting statements. The sample size was deemed too small to have any statistical validity, but comments were “acknowledged as a valuable planning tool in presenting many site-specific suggestions and detailed information.” The summary also stressed that the open houses had been geared toward gorge residents, and that the larger regional audience or the national audience was not heard from. This is significant—a statement from an NSA management agency that the wishes of local residents would not be the only determinants of choices about resources that form the backdrop of their backyards.

The literature suggests that scenic resources are difficult to manage and as such have often been ignored. Paramount in this context is the issue of what constitutes a scenic resource. To the question: “What do you most value or appreciate about the Columbia River Gorge?,” the most often-heard response (from 39 percent of attendees) was “the scenic resources and beauty of the gorge” (what is categorized in a later chapter as a generic statement). In response to the question: “What are three comments you hear about the gorge from visitors?,” 40 percent listed the scenic resources and beauty of the gorge, but the same answer was only listed by 13 percent for the question: “What are three comments you hear about the gorge from residents?.” Clearly, the scenic beauty of the gorge was important, but also taken somewhat for granted.

Was the public able to identify scenic resources in the NSA? A review of the public record yields a mixed response. The questionnaire asked about preferences for types of scenery to view (241 responses), and about favorite places for viewing scenery (274 responses). Rivers, waterfalls,

mountains and hills, greenery and wildflowers, and trees and forests made up the majority of the preferred types of scenery for viewing, an interesting mix of specific physical features and general landscape types. One hundred forty-six sites in Oregon and 88 sites in Washington were identified as favorite places for viewing scenery. The majority of these were on SMA lands, many of which were already managed with a scenic management objective. There were 115 suggestions in response to the question "What should be done to improve scenic appreciation?," with the majority being additional and/or improved viewpoints. This is evidence that the open house attendees were able to articulate what scenic resources they most valued in the gorge.

On the other hand, the usefulness of the information was limited because what the public suggested covered most if not all of the NSA. This is not surprising, since open houses were held in NSA counties, and most open house attendees were gorge residents. It is also not surprising since the scenic inventory identified virtually the entire gorge as lands sensitive to landscape changes.

Also, Penning-Rowell (1981) states that it is important to identify what the public believes to be the facets of landscape variety. The open house questionnaire asked for preferences for types of scenery and for locations to view it, but did not address landscape dimensions and variety (as the inventory prepared by the NSA office did) as a way to gauge the public's appreciation of and expectations about scenic resources. It can be argued that asking for such information was unnecessary because the preferences stated at least confirmed those areas gorge planners were proposing to address in terms of scenic

resource protection and enhancement. This highlights the difficulty in addressing intangible elements in the landscape. However, not addressing these issues, due either to their complexity in the gorge, to time constraints, or both, calls into question the NSA office goal of designing an inventory system that would have both public understanding and support.

When asked specifically about preferred types of NSA scenic resources and locations for viewing scenery, the open house attendees responded with fairly specific information. The record also indicates this was the only time site-specific information was specifically requested. The public was not asked to provide information about differentiating among landscapes, since this task had already been completed by agency planners. The open houses were successful in presenting scenic resource information to the public and getting a sense of the public's values in viewing the gorge.

Public Involvement Goals

Section 6(e) of the Act required agency consultation and public involvement in the development of the management plan by both the CRGC and the NSA office. As stated earlier, the USFS already had an established track record in and around the gorge, due to its national forest management responsibilities. The pressure was on the new CRGC and its staff to prepare for and implement an outreach process.

Iacofano (1990) summarizes four goals for successful public involvement: information exchange; public interest group representation; public interest mediation and acceptability; and agency responsiveness. Each of these was important in the development of NSA

policy. The information exchange process was already underway with the completion of workshops on the interim guidelines and a round of open houses held in October and November 1988, at which the public was asked to comment on the scenic resource inventory. The CRGC and NSA offices had already compiled a huge mailing list that included federal and state agencies, local officials, interest groups, and the media, to ensure that any and all interested parties were notified of opportunities to participate and be represented in the planning process.

A major agenda item at the January 24, 1989, meeting of the CRGC was the public's role in the planning process (Columbia River Gorge Commission, 1989b). Much of the discussion centered on the other two of Iacofano's concerns--the acceptability of the process and how well agencies provide feedback to the public. CRGC commissioners expressed concern that it be careful about putting finished products before the public, that lay people should be involved early in the planning process, and that more of the CRGC agenda be opened up to public comment. Noted in the meeting's minutes was a specific concern that the scenic resources inventory presented at the open houses already had a high degree of analysis built into it.

The CRGC subsequently adopted goals for public involvement, which, along with the public involvement activities that had already taken place, suggest a sensitivity consistent with Iacofano's goals as outlined above. These goals were:

- To develop the best management plan possible for the NSA;
- To involve all interested parties in the process of developing the management plan for the NSA;

- To engender a vision of the Columbia River Gorge as a community of⁸⁸ interests that transcends political boundaries;
- To develop a management plan that, within the bounds of the NSA Act, reflects the aspirations of the people of the gorge and others who have an interest in the NSA;
- To enhance public understanding of the resources of the gorge; and
- To encourage a spirit of stewardship among the people of the gorge.

The emphasis of these goals was on creating a vision of the gorge that reflects local concerns, with the use of terms such as “community of interests” and “a spirit of stewardship,” but ultimately the key provision would be “within the bounds of the Act.”

Key Community Contacts

Section 5(d) of the NSA act required the CRGC to establish volunteer technical and citizen advisory committees to assist it in carrying out its functions under the Act. A planning advisory committee was initiated which included the planning directors of the six gorge counties, and another advisory group was formed to look into cultural resource issues. To further meet this requirement and also to get information to and input from the grass-roots level, the CRGC office in January 1989 proposed developing a list of key community contacts (KCCs), local persons willing to provide a link between gorge planners and gorge counties, communities and people (Columbia River Gorge Commission, 1989c). A list of KCCs by county was developed from responses to letters of interest sent to the 650 people who attended the first round of open houses, and more than 600 people initially expressed interest.

The first round of KCC meetings was held from March through June of 1989. Several meetings were held in each NSA county, and at each meeting different topics were discussed. Prior to each meeting, KCCs

received background information on planning issues, summaries of the⁸⁹ Act's direction, proposed criteria, and key questions that needed debate and resolution. In these meetings, information from the public was requested on issues of interest in their particular geographic area. These issues covered forest and agriculture lands, commercial and residential lands, recreation intensity zones, cultural resources, transportation, and resource lands.

A number of salient comments regarding scenic and other resources came out of this first round of KCC meetings, indicating the breadth of issues facing gorge planners. Skamania County KCCs wanted retention of cultural landscapes and planning in ways that were both politically acceptable and quantifiable, and Skamania and Klickitat County KCCs asked in no uncertain terms that KCCs be given feedback on how their comments were being used. This was continually perceived as a problem throughout the policy development process by KCCs as they attended meeting after meeting. Wasco, Clark and Klickitat County KCCs wanted recreation development that would not detract from scenic resources. Wasco County KCCs also wanted preservation of the integrity of the Scenic Highway, and compensation for landowners subject to restrictions for scenic purposes, and air quality monitoring.

Clark County KCCs wanted the protection of scenic resources as a guiding principle, more contact between commissioners and the public, and careful consideration of the NSA boundary. Klickitat and Hood River County KCCs wanted more discussion of and definition to key viewing areas, and the former wanted compatible residential development outside of urban areas.

This sharing of concerns about particular resource types and land uses through the KCC meetings represented the beginning of the process to sell the concept of a scenic area to gorge residents and to involve them in the process of detailing exactly what the NSA would mean to them.

Land Use Designations

As required by section 6(b) of the Act, non-federal lands had to be designated as agricultural, forest, commercial, residential or open space. Land use designations (LUDs) were among the first proposals developed by the NSA and CRGC offices. LUDs were fashioned primarily from existing land uses to (among other things) “protect scenic resources by preserving the existing character of the landscape” (Columbia River Gorge Commission, 1989d). This is another example of the effort to develop new regulation from existing policy, which Brown et al. (1986) state is essential to relating the success of aesthetic policy to systems already in place for making decisions about landscape usage.

The open space designation was also proposed mainly for the SMAs in the western half of the NSA as a zone to “protect lands which have significant natural, cultural or scenic resources.” These lands were mainly in the Mount Hood National Forest and already had been withdrawn from timber harvest. However, the open space designation was also proposed for some private lands as well, and this proposal turned out to be highly controversial. Recognizing this, the LUDs were previewed at an NSA-wide KCC meeting prior to the August 8, 1989 meeting of the CRGC. At both meetings, maps showing proposed land use designations were presented. There was confusion over how LUDs would relate to the protection of scenic quality. CRGC staff stated that

LUDs were not in conflict with scenic qualities, but that scenic resources⁹¹ inventory maps were used in developing the LUDs, and that together they would protect scenic resources.

In October 1989, another series of workshops was held to show, among other things, revised land use designation maps. The workshop mailer stated that "Our challenge is to develop tools which adequately protect both sensitive resources and private property rights." At the workshops, questionnaires were given to participants in which they were asked to comment on the accuracy of the depiction of resources on the land use designation maps. The gist of the comments about scenic resources was that they are priceless, that viewsheds must be protected, and that visual enjoyment should receive the highest priority. However, there were also comments such as "no timber harvesting in viewsheds," "major recreation goes against the scenic area idea of the gorge," and "preserve scenic vistas and natural beauty without further development," which again underscored the task NSA planners were about to begin of developing policies that resolve conflicts among competing uses on resource lands in the gorge.

Conclusions

Through the KCC meetings gorge planners began to acquire an understanding of local sentiment; continued involvement in the process and the details of exactly how lands in the NSA were to be managed emerged as early issues. Protection of scenic resources was listed as a high priority, but the gorge public was also very concerned about what scenic resources management was going to mean to private land and the gorge economy.

There were beginning to be signs of differences in concerns between⁹² urban and rural counties, and between those who lived in the gorge and those who did not. In general, urban counties, at least through their KCCs, were interested in the greatest level of protection of gorge resources, while the more rural counties wanted flexibility in the policies. This was due partly to the variations in vegetation types and landscape settings, but can also be explained by where the interest was in protecting the gorge. There were concerns about the application of open space and about a new concept of KVAs, as the complexity of a management scheme began to emerge.

Up to this point only the scenic resource inventories and the land use designations had been completed, and these were done by gorge planners in the NSA and CRGC offices. In response to scenic resources inventory maps, the public had been asked where it liked to view scenery in the gorge and what it preferred for types of scenery. LUDs provided some idea of what a general overall land use strategy would be for the gorge, but no specifics about management of the NSA yet existed other than the mandates in the Act and the interim guidelines. The concern had been raised about putting finished products before the public, but the record suggests this was already happening.

At this point, the emphasis shifted to involving the public in the development of the specifics of the management scheme that would among other things protect and enhance scenic resources.

Chapter VI

DEVELOPMENT OF NSA SCENIC RESOURCES POLICY AND THE SIGNIFICANCE OF PUBLIC COMMENT

INTRODUCTION

Designating the gorge a national scenic area was controversial in nature, and consequently the USFS NSA office and the CRGC staff had a monumental public relations task to undertake. The very idea of what exactly a national scenic area was to be, let alone what policies, standards, and regulations would apply to scenic area management, had to be developed, packaged and presented to the public both as a way to educate the public and to gain their understanding and participation in development of the management plan.

The development of the management plan for the Columbia River Gorge National Scenic Area was an exercise in learning, both on the part of agency experts as they gathered information and adapted existing management strategies to meet the requirements of the Act, and on the part of the public as they attempted to understand just exactly what scenic (and other) resource protection in the gorge was to be. At issue is the degree to which public input was used to develop scenic resources management policies. The variables in this discussion relate to:

- an understanding by both the public and agency experts of what scenic resources are and the ability to identify them (covered in chapter V);
- the strategies used to manage scenic resources; and
- the significance of the public's role in developing policies to implement such strategies.

This chapter focuses on the last two of these.

The literature suggests that scenic resources are difficult to identify and define, and consequently are not given much thought by the public. In response to mandates for management of scenery, the results are often complex management systems that have the potential to compound the problem of understanding and acceptance by a skeptical public. Creighton (1981) and Iacofano (1990) point out that the complexity of issues often hinders successful public input in addressing them, which often leads policy-makers to fall back on broader mandates in search of an implementation strategy.

Brewer and deLeon (1983) state that the traditional focus of the policy analyst's work has been the generation of policy alternatives and options. This occurs during the estimation phase of the policy process, which is characterized by a systematic investigation of a problem and thoughtful assessment of options and alternatives. Estimation is founded on questions of values—those initially of the policy analyst in the attempt to simplify the complexities of decision-making for the decision-maker, and ultimately the values of the decision-makers as they consider alternatives and options in the context of the political landscape. This is what Rein (1976) identifies as the fact-value dilemma, which in this context relates to identification of both a range of alternatives and their consequences and the stated preferences for

alternatives. Schauman (1988) states that such consideration has to occur or else attempts to implement policies for scenic resource protection will fail. This relates directly to Iacofano's (1990) successful public involvement goals of public interest mediation and agency responsiveness.

In a technocentric management scheme policy makers are thought to be resistant to public input, and the complexities of management schemes combined with lack of consensus among multiple stakeholders and a failure at public interest mediation often results in policy makers relying on given mandates rather than on innovative policy solutions.

The issue is the meaningful participation of the public in a decision-making process that affects them directly. This raises questions about who is entitled to participate, what the purpose of participation is, and what the expectations of willing participants are. Kann (1986) calls this "democracy with a small 'd'," meaning that local residents must have systematic opportunities to express and debate their preferences and to participate in policy-making processes. There is no doubt that systematic opportunities were provided, so the issue is whether or not people offered tangible, relevant input and whether or not this input found its way into the management plan.

As previously stated, the CRGC and the NSA office had the responsibilities to develop management policies for the GMAs and the SMAs, respectively, and they did so along separate but parallel tracks. Given the public involvement goals, and to facilitate the development of policies, a cyclical system was implemented whereby revisions to particular resource goals and objectives were made by staff and given to

KCCs before being discussed at a CRGC meeting, after which the process⁹⁶ would repeat. The process of using KCCs was begun by the CRGC and later joined by the NSA office, and KCCs met almost monthly when policy development began.

The policy development process, which began after the adoption of the interim guidelines in July 1987, lasted for about three-and-a-half years. Primary public involvement points were the KCC meetings, open houses, workshops, a county planner roundtable, and CRGC meetings. By all accounts there was no shortage of opportunities for public input in the gorge.

The Draft Management Plan for Special Management Areas (DMPSMA), prepared by the NSA office, was published in October 1990. The Preliminary Draft Management Plan for General Management Areas (PDMPGMA), prepared by the CRGC office, was published in December 1990. These documents represented the first time the public had seen all SMA and all GMA policies together, and were intermediate steps in the policy development process. Several workshops were held on the DMPSMA, and four public hearings held on the PDMPGMA. Publication of the Final Draft Management Plan (FDMP) was in July 1991. This document was the first time policies for both GMAs and SMAs were presented together. Three public hearings were held on the FDMP in September, and the plan was finalized with the concurrence of the Secretary of Agriculture in February 1992. Table 3 shows the number of responses at each of the formal public participation steps.

Table 3
NUMBERS OF RESPONSES AT VARIOUS STAGES IN THE
DEVELOPMENT OF THE NSA MANAGEMENT PLAN

Management Plan Stage Date	Total Responses ¹	Responses mentioning scenery, open space, day viewing areas, or landscape settings. ²
Draft Management Plan for SMAs 10-90	286	46
Preliminary Draft Management Plan for GMAs 12-90	785	134
Public Hearing on PDMPGMA 1-24-91	47 (testifiers)	19
2-11-91	50	14
2-22-91	74	27
3-12-91	82	22
	(253)	(82)
Final Draft MP 7-91	562	103
Public Hearing on Final Draft MP 9-10-91	19	10
9-12-91	31	7
9-24-91 (gov't. agencies)	37	3
	(87)	(20)
TOTAL	1973	385
Percent	100	19.5

1. Written responses received during the comment period, and the number of testifiers at public hearings. Signed petitions were counted as single responses.

2. The number of responses containing comments on any of these related scenic resource categories.

With the scenic resources inventory and land use designations completed, gorge planners set about the task of developing goals, policies and objectives for management of NSA resources. Even though the Act had twin goals, the emphasis on policy development from the outset was on protection and enhancement of SNCRs, the Act's first goal.

There are four primary components for managing and protecting the scenic resources of the NSA. These are landscape settings, key viewing areas (KVAs), open space designations, and overall scenic provisions (Columbia River Gorge Commission and the U.S. Forest Service, 1992). How these protection strategies were influenced by public comment is the focus of analysis that is presented in this chapter.

GMA Policy Framework

Before individual policies and guidelines could be developed for scenic resources, a management framework had to be developed that established the relationship between proposed development and land use activities and the particular landscape where such activities were proposed. The CRGC office initiated the development of scenic resources policy with a conceptual discussion of a general objective for scenic resource protection. The outcome of this process was crucial, because the level of protection through specific policies to be developed would depend on the outcome, and would ultimately frame the public debate about how the objectives of the Act were being met.

As a first step the CRGC office published a GMA scenic resources objective statement proposing that "all structural development should be visually subordinate to and blend in with its landscape setting"

(Columbia River Gorge Commission, 1989e). As stated, this objective keys off the resource inventory elements of visual absorption capability, landscape diversity and landscape sensitivity in meeting the Act's first goal with regard to scenic resources. Options considered included requiring screening all structural development and/or selectively applying it to structures identified with certain land use types. At the draft stage, however, CRGC staff felt that any structural development had the potential to generate adverse visual impact and should be subject to a consistently applied principle.

Two additional policy directions were presented:

1. that the objective not apply to replacing or modifying historic structures, as long as the structure's historic character was maintained; and
2. scenic impacts of proposed development should be evaluated as seen from all public roads, parks, viewpoints, or other places where public views of the landscape are afforded.

The first of these was clearly in response to the historic importance of the gorge as a cultural landscape. Implementing it hinged on setting up a discretionary design review mechanism, and CRGC staff thought that applying such discretion to the entire "cultural landscape" of the gorge would be overly complex. The second policy direction appears to be an attempt to get reaction to just how extensive regulations would have to be in some areas, although the initial assumption was that protecting "private viewsheds" was not mandated by the Act. This was the prelude to discussions of key viewing areas management.

The policy objective and policy directions were discussed at the December 19, 1989 meeting of the CRGC. The discussion touched on several issues:

- that “landscape settings” are not synonymous with “natural environments,” but include human presence as well;
- whether or not economic development would be discouraged by the “visually subordinate” requirement;
- that the whole notion of KVAs had not been analyzed, and that there was little public involvement on this issue;
- what constitutes an adverse impact; and
- that staff is doing a disservice to the public by not presenting proposals in simple enough terms.

One CRGC commissioner suggested deleting the concept of “visually subordinate,” but ultimately the CRGC voted unanimously to support the concepts outlined by CRGC staff, to develop additional explanation and alternatives, and to present the alternatives at another round of KCC meetings (Columbia River Gorge Commission, 1989f).

The last of these concerns as a process comment relates to the other four, which speaks to the complexity of the approach the CRGC and the NSA office were proposing as scenic resource protection policy. The CRGC was still on a learning curve, and these concepts loomed large not only in terms of CRGC understanding, but in the understanding and acceptance of the interested public. From a process standpoint, the complexity of managing the gorge was starting to become apparent, as commissioners cautioned against proposals that were too complicated for the public (and perhaps themselves) to understand. In a similar vein, the new framework policy contained reference to KVAs (which will be discussed later), something apparently of concern for a number of reasons.

The next policy issue was consideration of levels of stringency to be applied to scenic resource protection. As Brewer and deLeon (1983)

stated, the development of alternatives is an essential part of the policy¹⁰¹ development process. It was very difficult to differentiate between levels of protection, given the inflexibility of the mandates in the Act. Nevertheless, CRGC staff developed four alternatives for public review. These ranged from allowing virtually no change from new development through a visual subordination requirement to allowing development that was compatible with the general character of the landscape (Columbia River Gorge Commission, 1989f). Ultimately, such alternatives only provided the illusion that there was some flexibility in the application of scenic resource mandates.

The alternatives were presented at another round of KCC meetings in January 1990. In general, urban county KCCs (Multnomah and Clark) favored the visually subordinate test for new development, while the more rural counties favored the less-restrictive standard of compatibility with the landscape setting. This is not unexpected, since the primary push for gorge protection came from the Portland metropolitan area, and much of the eastern end of the NSA is open fields where it would be impossible to visually subordinate any new development.

On February 14, 1990, CRGC staff published its policy recommendations regarding structural development and scenic resource protection, noting that there had been “substantial public input on these issues” (Columbia River Gorge Commission, 1990a). The memo goes on to say that a number of people wanted a minimum level of scenic resource protection for all lands in the NSA, and that CRGC staff agreed with this notion. This is not surprising, given the Act’s requirements. Ultimately, the CRGC adopted a staff recommendation that:

All new development on lands seen from key viewing areas shall¹⁰² be visually subordinate to and not noticeably contrast with its landscape setting, except for such lands which are in developed settings and not visually sensitive. For these lands, all new development shall be compatible with its landscape setting. The list of key viewing areas shall be expanded to include important public roads, trails or other vantage points not currently listed as key viewing areas. Modifications to historic structures shall be exempt from a visual subordination objective.

At this point, the policy direction was that the test for new development would be the more restrictive “visually subordinate” test, and that this would be applied to an expanded list of KVAs within the NSA. The concept of KVAs as yet had no management definition.

SMA Policy Framework

The NSA office drafted its SMA scenic resource management framework after considering the results of workshops held in October 1989, and published draft SMA goals and policies for scenic resources on January 1990 (U.S. Department of Agriculture, NSA Office, 1990a). The document listed three primary goals:

1. There will be no reduction in visual quality.
2. All new developments and land uses shall be compatible with the landscape setting.
3. All new developments and land uses as seen within the foreground from a key viewing area shall not be evident to the casual observer (USFS Visual Quality Objective (VQO) of Retention). All new development as seen middleground from a key viewing area shall be visually subordinate (USFS VQO of Partial Retention).

Each goal was accompanied by general guidelines, with the particulars of how the goals and policies were to be implemented to be developed at a later date. Unlike the process used by the CRGC, there were no scenic resources protection alternatives with the draft goals and policies.

Goal 1 on visual quality reduction came straight from the Act and the¹⁰³ interim guidelines, which stated that scenic resources were to be protected and enhanced. The standard was to be the visual subordination test for new uses and developments as viewed from public roads and trails, alluding to the emerging importance of the concept of KVAs.

Goal 2 directly related to the GMA policy that new development will be compatible with and maintain or enhance its landscape setting. At this point, landscape settings were defined as they were in the interim guidelines, i.e., developed, rural, and undeveloped. However, part of the proposed implementation of this goal was to be a better delineation of landscape settings.

Goal 3 incorporated the existing USFS VRM program by tying new developments and land uses to the program's visual quality objectives (VQOs). Section 8(a) of the Act required the use of VRM guidelines on SMA lands. Proposed policies to implement this goal included exempting historical and landmark structures, similar to what was proposed for GMA lands, and expanding the list of KVAs beyond those listed in the interim guidelines, something the CRGC initially approved of.

The majority of KCC comments on the draft SMA scenic resource goals and policies came from Hood River and Skamania Counties, not surprising since their portions of the NSA are mostly SMA lands. The goal of no reduction in visual quality was criticized because: 1) there was no definition of visual quality; 2) no reduction in visual quality was impossible to achieve; and 3) the ordinary person could not live with visual quality restrictions. Only Clark County KCCs were supportive,

stating that there should be minimum standards for visual quality throughout the gorge so there would be one basic set of regulations applicable NSA-wide. Clark County KCCs also wanted more definition to the different existing landscapes.

The third goal was criticized by Hood River County KCCs on the basis that the VQOs were outdated, too vague and not scientific enough in terms of evaluation criteria. There were concerns from the rural counties about what KVAs were and how views from KVAs would be regulated. At this point in the development of the management plan, the concept of KVAs was not well-developed, nor was it understandable by the general public, but it continued to be touted as a management tool. KCC comments on SMA goals also revealed concern over key proposed provisions in terms of both subjectivity and complexity. Comments again highlighted the differences between urban and rural concerns in the approach to protection of scenic resources in the NSA.

At this point the basics of the management plan framework for scenic resources for both the GMAs and the SMAs were in place. The focus became the development of the specific elements of the management plan to protect and enhance the scenic resources of the NSA.

Landscape Settings

Landscape settings are the combination of land uses, landforms, and vegetation patterns that distinguish an area in appearance and character from other portions of the scenic area. Landscape settings as a concept came from the 1980 NPS study of the gorge, in which 12 landscape types were identified in an effort to define the scenic quality of the gorge.

The ability of landscapes to accommodate development that is visually subordinate to their prevailing physical features is the primary focus of landscape settings. The development of scenic resource protection policy was based on the acknowledgment that the diverse NSA landscapes varied in their capacity to “absorb” additional development without changing the character or causing adverse visual impact. This notion of visual subordination is novel among schemes to manage scenic resources and address scenic impacts. Landscape settings were proposed as broad landscape assessment classifications useful for analyzing the regional viewshed. Variables used in the classification included water, vegetation, physiography, and existing and projected land uses.

While not proposed as zones in the traditional sense, design guidelines ensuring that new developments are compatible with and maintain the character of their surroundings were clearly tailored to each setting. These included requirements dealing with height limitations, setbacks, landscaping and screening, the use of colors and building materials, and clustering of structures, all of which are standard zoning tools.

GMA Policy. After the adoption of the visual subordination policy, the next step was to identify and define those areas in which scenic resource protection would apply. In March 1990, CRGC staff issued a set of policies regarding landscape settings and scenic protection in the GMAs (Columbia River Gorge Commission, 1990b). One of the key problems was that there was no way to address cumulative impacts of development proposals, especially in areas not seen from KVAs and in

developed settings. CRGC staff stated that cumulative impacts could be¹⁰⁶ addressed through the recognition that various landscape areas have distinct visual identities, and proposed that new land uses and developments be compatible with and not change their landscape settings. Along with the visually subordinate test for individual developments, CRGC staff believed that such a proposal would provide comprehensive protection for all landscape settings in the NSA, and that together these policies would provide the bulk of the overall scenic resource protection program for the management plan.

CRGC staff identified three things necessary to provide protection for landscape settings:

1. define and identify landscape settings;
2. identify land use patterns characterizing each setting; and
3. identify, where applicable, the characteristics of vegetation patterns distinguishing each setting.

From this information, much of which was already available from the scenic resources inventory, guidelines on development densities, appropriate land use activities, and vegetation management practices would be developed.

As they had done with the overall scenic resources protection objective, CRGC staff identified issues and presented alternatives for discussion at KCC meetings. The first issue was whether there should be a policy that new development and land uses be compatible with and not change its landscape setting. Three options were presented:

1. to rely only on a visual subordination test;
2. to develop a policy to protect the visual qualities of all landscape settings; and

3. to develop a policy only for the most visually sensitive NSA lands.

The second issue was whether to identify “desired” landscape settings and apply protection to them, or to protect existing settings only.

Besides allowing for the enhancement of scenic resources quality in particular settings, this policy provides the potential to establish recreational river access where it is best suited and to enhance the visual integrity of rural centers.

The third issue addressed the definition of landscape settings. The two presented options were:

1. to use the interim guidelines definitions (developed, rural, or undeveloped); and
2. to define landscape settings by their land use patterns, vegetative patterns and landforms.

CRGC staff included nine categories for the second option. The CRGC had previously adopted policy direction that existing landscape settings would be used in determining minimum lot sizes (which addressed density issues) in residential, agriculture, and forest land use designations.

KCC meetings were held on landscape settings policies in April and May 1990. On the issue of including a policy about landscape compatibility for new development and land uses, public comments were far-ranging. Summaries of the KCC meetings showed that there was support for all three options, and no clear consensus about which option to adopt. There was considerable confusion about terminology, and about the concepts and how they would be applied. CRGC staff recommended that “new development shall be compatible with and not change its landscape setting,” stating that such a policy would help

determine densities and allowable uses for each landscape setting, and¹⁰⁸ that design guidelines for implementation would be established. CRGC staff also recommended that “desired” landscape settings be established, that they be based on existing settings, and that changes to the desired setting be allowed if consistent with the Act. The majority of KCCs preferred expanding the number of settings beyond those in the interim guidelines, and the CRGC staff agreed. Protection of landscape diversity in the NSA by recognizing different vegetative patterns and landforms was given as the main reason to support this option.

The CRGC staff gave its recommendations on landscape settings to the CRGC in June 1990. Included was a statement that new development shall be compatible with and not change its landscape setting, and that desired settings would be established, based largely on existing settings (Columbia River Gorge Commission, 1990c). There was considerable confusion over the difference between visual subordination and landscape compatibility, to the point that CRGC staff presented a slide show to illustrate the difference between visual subordination (which would apply to lands seen from KVAs) and landscape compatibility, the minimum standard for all new development anywhere in the NSA. Another key issue was that of establishing minimum lot sizes as a way to control densities in the various land use designations. This was but one more way to maintain the visual character of landscape settings as a way to protect the scenic resources of the gorge.

The CRGC voted unanimously to adopt a policy that “new development shall be compatible with and maintain or enhance its landscape setting,” but excluded from the policy were agricultural and

forest practices. This was done to avoid the potential for precluding established resource uses.

The CRGC debated the notion of “desired” landscape settings, and decided unanimously to amend the CRGC staff recommendation to include “a range of landscape settings” rather than “desired settings.” This eliminated concerns of both KCCs and the CRGC about who would define what a desired setting was, and how (Columbia River Gorge Commission, 1990d).

An expanded list of eleven landscape settings for GMAs was presented by CRGC staff at an October 1990 CRGC meeting. The CRGC voted unanimously to adopt the recommendation to expand the list of landscape settings as proposed by CRGC staff. Two of the settings were combined, and with minor changes the landscape settings were incorporated into the Preliminary Draft Management Plan for General Management Areas (PDMPGMA) (Columbia River Gorge Commission, 1990e).

Critical features of landscape setting goals and policies were 1) the establishment of minimum parcel sizes within GMA land use designations to maintain the landscape setting, and 2) design guidelines for new development tailored to each setting. The design guidelines were to ensure that new developments were compatible with and maintain the character of the setting, and to facilitate compliance with visual subordination standards for lands seen from KVAs, even though the guidelines were drafted with “should be compatible” language (Columbia River Gorge Commission, 1990f).

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SMA Policy. In April 1990, the NSA office issued a draft policy paper¹¹⁰ on SMA landscape settings, a month after CRGC staff made its recommendation for GMA landscape settings. There was consistency with GMA policy in that landform, vegetation, and land use were the primary attributes for delineating the settings (U.S. Department of Agriculture, 1990b). Each was mapped as a management area with a specific boundary.

The draft SMA paper, however, discussed a management approach based on “preferred landscape settings,” which were similar to the notion of “desired” landscape settings. Individual ordinance provisions would be written for each landscape setting, and a three-level approach was proposed using VRM criteria:

1. Land uses not compatible with the preferred landscape setting should not be evident to the casual observer, which would meet the VQO of retention.
2. Land uses compatible with the preferred landscape should be visually subordinate, which would meet the VQO of partial retention.
3. Land uses which exemplify the preferred landscape setting should be compatible with the preferred setting, which would meet the VQO of modification.

The draft policy paper stated that within a single landscape setting, the amount and degree of regulation to meet scenic resource goals would vary for individual uses, meaning that all land uses would not be treated the same. The three-level system, was touted as a way not only to protect scenic resources from the adverse effects of incompatible development, but as a way to encourage enhancement of the scenic landscape. Given the potential for inconsistent application of goals and objectives, even within the same setting, and the difficulties of administering such a system, the NSA office abandoned this complicated

approach in favor of a test of visual compatibility with the landscape setting, similar to what GMA policy was (Columbia River Gorge Commission, 1990d).

Public Comment. Public comment was received on landscape settings policies from workshops held on the DMPSMA and from public hearings held on the PDMPGMA. Salient comments and how many times each was made are shown in Tables 4 and 5. More settings were requested and there was some confusion over the need to distinguish between settings in the GMAs and SMAs, primarily because there were different definitions for the same settings.

Changes made by the CRGC at the PDMPGMA stage were minor (Columbia River Gorge Commission, 1991a). With regard to landscape settings, CRGC staff again proposed adding one area to the list of developed settings which are not visually sensitive, and changing the limitation on commercial buildings in the village landscape setting from 10,000 to 5,000 square feet. The CRGC approved these changes, as well as changing the "woodland" setting to "coniferous woodland."

The NSA office added an oak/pine woodland setting within the SMAs, in response to public comment.

The only comment made on landscape settings at the FDMP stage was again a request to combine the landscape settings between the GMAs and the SMAs. The SMA landscape settings descriptions were changed to be identical to those described for GMAs prior to adoption of

Table 4
SALIENT COMMENTS ON GMA LANDSCAPE SETTINGS POLICIES

- Any new development must be compatible with its surroundings; consideration should be given to mitigation measures to allow such development (2)
 - More landscape settings are needed (1)
 - Landscape setting definitions are too vague and broad (1)
-

Table 5
SALIENT COMMENTS ON SMA LANDSCAPE SETTINGS POLICIES

- More landscape settings are needed (3)
 - Any new development must be compatible with its surroundings; consideration should be given to mitigation measures to allow such development (2)
 - Combine the landscape settings between the GMAs and the SMAs (1)
 - An "oak woodland" landscape setting is needed (1)
 - Landscape settings standards have a lot of discretionary language (1)
-

the management plan. Also, SMA policy was changed in the management plan to require protection of landscape settings; the FDMP only required that they be identified. CRGC staff proposed only minor changes to landscape settings policies (Columbia River Gorge Commission, 1990c).

Given that landscape settings were touted as a principal management tool for addressing new development, there were surprisingly few comments on the settings. Despite not being considered as land use zones, they nonetheless were identifiable areas based on the readily understandable criteria of vegetation and landform, which may explain why they were non-controversial. Ten settings were listed in the management plan, and policies for them touted as a long-term vision of scenic protection as expressed in the landscape. Examples of landscape settings include grasslands, coniferous woodlands, rural residential areas, gorge walls and canyons, and river bottomlands. Each has its own objectives and policies for protection of scenic resources.

Key Viewing Areas

The concept of key viewing areas (KVAs) does not appear in the Act, but emerged during the development of the interim guidelines. The application of the visual resource management guidelines by gorge planners resulted in the entire gorge having high quality scenic resources that would be sensitive to and therefore at risk from landscape alterations. KVAs were identified by gorge planners as important public viewpoints, travelways, parks, and other areas open to the public that offer opportunities to view gorge scenery. Given that all lands contained scenic resources, the idea was to differentiate those most visible from public viewing areas. These were identified from the scenic resources inventory “seen areas” analysis as lands that were the most visually significant and the most vulnerable to visual change. Thus, KVAs were to be the focus of greater levels of scenic resource protection as compared to lands not seen from KVAs.

The list in the interim guidelines included not only the entire segments of Washington State Route 14, Interstate 84, and the Historic Columbia River Highway that were in the NSA, but a number of other roads, trails, and lookouts as well. An offshoot effort of KVAs was a review of major scenic travel corridors (Interstate 84, Washington State Route 14, and the Historic Columbia River Highway), with two of the goals being to improve the scenic quality of the corridors, and to establish or re-establish vistas from the corridors.

GMA Policy. KVAs were emphasized as primary viewsheds, and thus would receive the highest level of scenic resource protection in the NSA (Columbia River Gorge Commission, 1990g). A general discussion of KVAs took place at the August 28, 1990, CRGC meeting, focusing on the expanded list of KVAs, which had been part of the visual subordination policy adopted by the CRGC earlier in the year.

Evident from the discussion was that the concept of KVAs was not well understood, that they appeared to be overbroad and over-regulating, that there had not been enough public input, and that it would be difficult to explain to the public what KVAs were to accomplish (Columbia River Gorge Commission, 1990h). As stated earlier, KCCs raised concerns over what KVAs were and how they would be regulated. The expanded list was not adopted by the CRGC, and CRGC staff was asked to work on a shortened list before publication of the PDMPGMA.

The section on KVAs in the PDMPGMA emphasized protection and enhancement of landscapes seen from them. The basic policy was restated: that new development on lands seen from KVAs be visually subordinate to and not noticeably contrast with its landscape setting.

Specific guidelines required a site plan for all proposed structures visible¹¹⁵ from KVAs that addressed size, height, shape, color, reflectivity, lighting, siting, and landscaping, as well as the use of topography and vegetation for screening, and specific utility and access alignments. Also covered were limitations on the protrusion of structures above ridgetops, bluffs, or skylines. A key provision addressed the extraction of mineral resources, with the proposed objective that of terminating existing quarries at sites visible from KVAs and developing plans for reclamation of such sites. Of all the resource uses in the NSA, mineral extraction was the only one specifically singled out in KVA guidelines.

SMA Policy. The NSA office used the same definition and list of KVAs for the DMPSMA as the CRGC did for the PDMPGMA. However, policies applicable to KVAs were presented in management guidelines relating to standards for design and standards for visual compatibility with landscape settings, again keying off the landscape assessments that had been done in-house using existing VRM guidelines (Columbia River Gorge Commission, and the U.S. Forest Service, 1992).

Public Comment. Prior to the public hearings on the PDMPGMA, the CRGC held workshops, and there were several comments on KVAs. The concept was described as flawed by one commenter, and as an absurd qualification by another. One commenter questioned what it meant to be “visually subordinate.” Several commenters on KVAs reiterated the theme of beauty being in the mind of the observer. The signed petitions also included a statement that the definition of key viewing area was too broad, allowing for unreasonable restrictions. However, KVAs were

deemed important by one commenter who likened gorge visitors to those¹¹⁶ who visit the Grand Canyon—those who “drive through and take a look.”

Considerable public comment was received on KVA policies from workshops held on the DMPSMA and public hearings held on the PDMPGMA. Salient comments and how many times each was made are shown in Tables 6 and 7. The inclusiveness of KVAs to the point of being meaningless and the need for specific standards to protect land visible from KVAs were the two most recurrent comments. The former applied primarily to the GMAs; the latter, to the SMAs. Apparently the public believed there was inadequate specificity in the guidance that would be used by the counties in implementing the management plan. The other controversy was over the provision to terminate quarries in the NSA.

Table 6
SALIENT COMMENTS ON GMA KEY VIEWING AREAS POLICIES

- There are too many KVAs; KVAs are too inclusive so as to be meaningless (6)
 - Terminating quarries flies in the face of the Act's second goal; may not be able to meet the demand for aggregate if quarries have to shut down (4)
 - Need a list of scenic drives (3)
 - Add the Pacific Crest Trail (2) and Gorge Trail #400 as KVAs (1)
 - Delete all KVAs except I-84, SR-14 and the Columbia River (1)
 - Mitigating measures for quarries are needed (1)
 - Need new viewpoints to see the gorge (1)
-

Table 7
SALIENT COMMENTS ON SMA KEY VIEWING AREAS POLICIES

- Specific standards are needed for lands visible from KVAs for the counties to use (6)
 - Need a list of scenic drives (1)
 - KVAs are too inclusive so as to be meaningless (1)
 - Add the Pacific Crest Trail (1) and Gorge Trail #400 to KVAs (1)
-

After the hearings, most of the CRGC staff's recommendations for changes addressed KVAs, and more specifically the question of quarry operations in the NSA. Instead of a proposal to terminate all existing quarries visible from KVAs, the new recommendation was to phase out only those visible from KVAs that had been determined to adversely affect scenic resources, and to allow new or expanded quarries more than three miles from a KVA if visually subordinate to their landscape setting (Columbia River Gorge Commission, 1991a). This issue had received a lot of public comment, especially from quarry operators, and the revision responded to the "economic need to provide additional rock and aggregate resources near gorge communities and transportation sources." A guideline was added to establish an interim period for quarries as well as other new development to comply with screening or visual subordination requirements. CRGC staff also recommended dropping five KVAs from the list (due mainly to county comments and in some cases redundancies), and folding guidelines for "special areas and sensitive lands" into the KVA section. They also proposed a guideline tying requirements for visual subordination of a new development directly

to its potential visual impacts. This latter proposal “emphasized the need to recognize different degrees of potential visibility in the guidelines.”

The CRGC discussed quarries at length, and there were sharp philosophical differences among Commissioners on this issue, centering on the balance between the Act’s twin goals of protecting scenic resources and encouraging economic development. The CRGC adopted the staff recommendation allowing a phasing-out period (of five years) and allowing new or expanded quarries more than three miles from a KVA (Columbia River Gorge Commission, 1991b). A June 1991 CRGC office update stated that the CRGC tried to address concerns about KVAs by changing policy so that KVA provisions could not be used to deny residential, commercial, or recreational developments otherwise consistent with the plan. Also, that the policy on quarries was relaxed to allow additional quarrying where such uses would not significantly affect scenic values, including fully screened quarries within three miles of a KVA and expansion of existing quarries if visually subordinate to their landscape setting. This represented a significant change in policy from that proposed in the PDMPGMA, and drew a great deal of criticism. Salient comments on KVAs from the FDMP and how many times each was made are shown in Table 8.

Table 8
SALIENT COMMENTS ON FDMP KEY VIEWING AREAS POLICIES

- New quarries should not be seen from KVAs (11)
 - No mining or development within three miles of KVAs (4)
 - KVAs are too inclusive so as to be meaningless (2)
 - Add Corbett Hill Rd. to KVAs (2)
 - Terminating quarries flies in the face of the Act's second goal; may not be able to meet the demand for aggregate if quarries have to shut down (1)
 - Need mitigating measures (screening) for quarries visible from KVAs (1)
-

As expected, the majority of comments at this stage related to the changes in provisions relating to quarries. Most of the commenters were adamant that new quarries not be seen from KVAs and that under no circumstances should mineral development be allowed within three miles of a KVA. There still was no detailed explanation of what management from KVAs would entail, except that new developments and land uses occurring in the foreground of KVAs shall protect scenic values, and that a revised list of KVAs was included in the glossary of the plan.

CRGC staff released its proposed revisions to policies on scenic resources protection in October 1991 (Columbia River Gorge Commission, 1991c). Staff proposed amending the policy on not using KVA guidelines to deny proposed developments otherwise consistent with the plan by stating that compliance with such guidelines was mandatory and might affect the siting, size, and other design features of the proposed development. With regard to KVAs, staff:

- proposed that KVA guidelines not apply to the Columbia River adjacent to urban areas;
- proposed the requirement of a written report on a determination of visual subordination as part of the approval process for new production or development of mineral resources; and
- proposed allowing variances from the requirement of no new buildings above the skyline of a bluff, cliff or ridgetop.

In a move to appease economic interests, all were included in the adopted management plan, and had the affect of further weakening the KVA guidelines.

Open Space

Open space is defined in section 2(l) of the Act as unimproved lands not otherwise designated as agricultural or forest lands. Among the nine areas identified as open space are:

- scenic areas
- outstanding scenic views and sites; and
- Federal and state wild, scenic, and recreational waterways.

It is not directly a scenic resource protection strategy, but can be applied to protect such resources.

Several portions of GMAs were designated open space in the preliminary land use designations, partly due to concerns about protecting scenic resources. Open space lands were highly significant and sensitive from a visual standpoint and were also predominantly highly visible from KVAs, and giving them other designations would be inadequate to protect scenic values. Most lands consisted of steep, wooded bluffs and cliffs directly facing the gorge. Also included were the banks of the Sandy River and the canyon of the lower Klickitat River (designated a Wild and Scenic River by the Act). Some lands were given

dual designations with forest lands, because of their timber as well as their outstanding scenic values. ¹²¹

GMA Policy. The legality of the open space designation on private land in the GMAs was an issue that had been discussed by the CRGC with the Attorneys General of Oregon and Washington. While there was no specific policy as yet, the CRGC was very sensitive to the issue, directing staff to apply open space sparingly and in a conservative manner, and to consider using it only after considering other protection options and designations; also, that the percentage of land for open space should be considered relative to the total private holding (Columbia River Gorge Commission, 1990i). A recommendation to systematically analyze all lands considered for open space was approved at the August 28, 1990 meeting of the CRGC, although several Commissioners expressed concern over the use of the open space designation (Columbia River Gorge Commission, 1990h).

Draft policies for GMA open space protection focused on prohibitions in usage rather than on regulation; forest practices, commercial, residential or industrial uses, and mining would not be allowed on land designated open space. The draft policies were to apply only in areas with the most sensitive scenic resources threatened with conflicting uses and where other means of protection were deemed inadequate. As part of the criteria for protection, two options were proposed. One related to general application of open space designation versus designation on public lands only; this issue would be the focus of a great deal of public comment. The other proposed two different definitions of improved lands, as open space in general was to apply only to unimproved lands.

Eleven specific areas were proposed as open space, as they met the criteria specified in the Act.

SMA Policy. The policy approach for SMA open space paralleled that for the GMAs, although most proposed open space in the SMAs was in public ownership. Proposed SMA guidelines required site-specific management plans to be developed for each open space area, and partnerships with interested groups, individuals, and agencies was suggested as an implementation means. Scenic area open space was proposed to protect the undeveloped character of certain lands within which development is likely to adversely affect scenic values, including areas of outstanding natural beauty, such as cliff faces, steep bluffs, tributary river corridors, and other lands adjacent to open space designations for other values (United States Department of Agriculture, 1990). All uses within an open space designation were proposed to be conditional uses.

In February 1990, the NSA office published draft goals and objectives for SMA open space and for natural resources (U.S. Department of Agriculture, NSA Office, 1990c). Goal 1 was a restatement of the interim guidelines on open space, i.e., to protect the natural, scenic, cultural and recreational resources of open space lands with SMAs. In the second goal measures to enhance open space resources were proposed, with by far the most important policy being that open space would be managed under site-specific direction developed (at a later date) for each area.

Open space and natural resource goals were discussed at KCC meetings in March 1990, and the summary of these meetings indicates that open space did not receive much discussion due to time constraints.

Most KCC comments, however, related to one of the criteria for open space designation: the protection of habitat for wildlife and unique plants. As previously mentioned, many of the comments foreshadowed a major controversy over the use of open space: when and how would it be applied to private lands in the NSA. This issue was the subject of numerous discussions at CRGC meetings during the latter half of 1990.

Public Comment. Prior to the public hearings on the PDMPGMA, the CRGC held workshops on it, and a large number of comments were made about the designation of open space. Most who commented stated that the open space designation was too restrictive and were appalled that it was proposed to apply to private land. Along with several comments about open space were statements about the lack of balance between the Act's twin goals and that the residents of the gorge need consideration equal if not greater than the resources of the gorge. Nineteen signed petitions that stated in part that far too much land was designated as open space were received in response to the workshops.

Open space policies drew the most comments at PDMPGMA public hearings held in the gorge, but received few comments at the Portland hearing. Salient comments and how many times each was made are shown in Tables 9 and 10. CRGC staff wasted no time in analyzing public comment to determine what revisions to scenic resource policies were necessary. On March 27, 1991, staff sent their revisions to open space policies and designations to the CRGC. The memo stated that staff had met with major landowners and resource agency biologists, and that from suggestions for boundary adjustments and alternative techniques

Table 9
SALIENT COMMENTS ON GMA OPEN SPACE POLICIES

- Not enough open space/protect open space (16)
 - Open space for: Hood River to Mosier (16); Chenoweth Table (9); Greenleaf Basin (4); Underwood Mountain (3); Columbia Hills (3); Table Mountain (3); Red Bluffs (3); Hood River Mountain (2); Larch Mountain (2); Columbia River (2); The Dalles Mountain Road (2); Gorge walls and canyonlands (2); Burdoin Mountain (1); Hamilton Mountain (1); Dog Mountain (1); Catherine Creek (1); Major Creek (1); Mitchell Point (1); Aldrich Butte (1); Rowena Plateau (1)
 - Too much open space; remove all open space designations; open space is outside the Commission's authority (5)
 - No open space for Chenoweth Table (3); the Columbia River (2); Hood River Mountain (2); or the Columbia Hills (1)
 - Open space designation for public lands only (2)
 - Open space designation only with a willing property owner (1)
 - Open space is not understood by the public (1)
-

Table 10
SALIENT COMMENTS ON SMA OPEN SPACE POLICIES

- Not enough open space/protect open space (2)
 - Open space for: Table Mountain (3); Aldrich Butte (2); Greenleaf Basin (2); Underwood Mountain (2); Dog Mountain (2); Red Bluffs (1); Catherine Creek (1); Major Creek (1); Mitchell Point (1); Hamilton Mountain (1)
-

for accomplishing the required protection appropriate changes were made (Columbia River Gorge Commission, 1991d).

It is evident that comments about open space were heard loud and clear by CRGC staff. While there was virtually no change in the language of the goals and policies for open space management, their recommendation reduced the amount of open space from 11,649 acres in the PDMPGMA to a proposal of 4,210 acres, a 64 percent reduction. About 63 percent of the proposed 4,210 acres would be private land. The Columbia River was dropped as open space in response to comments from cities and port districts in the NSA who feared that transportation activities would be hampered and urban boundary revisions would be more difficult.

Of 17 candidate open space areas proposed on the Washington side, nine were dropped, seven were reduced in size, and one was left as originally proposed. Of the five areas proposed because of high scenic values, three were proposed for open space designation with reduced areas (all with a mix of public and private lands), and the other two were dropped from further consideration. Only one of the five (Underwood Mountain) received any public comment. Through one of the areas reduced in size, the Lower Klickitat River Corridor, ran the Klickitat River, which in this area was designated outright as a federal Wild and Scenic River by section 13(c) of the Act.

Of 16 candidate open space areas proposed on the Oregon side, six were dropped, two were reduced, and eight were left as originally proposed. Of the eight areas proposed because of their scenic values, six were recommended as proposed, and one was dropped. The other

proposed area was the Hood River to Mosier Bluff, which received strong¹²⁶ public support for its scenic value, and CRGC staff recommended its designation with a reduced area (public and private lands).

The CRGC discussed recommendations by its staff on for revisions to open space policies at its April 1, 1991 meeting. There was approval for removing the open space designation for the Columbia River, but not for the Mosely Lakes area (Columbia River Gorge Commission, 1991c).

The major policy issue was the potential for a “taking” when private property was designated open space over the objections of the property owner. The CRGC’s discussion was more about the process of designation than about the proposed designations themselves. The language added by the CRGC to the general policy of “designating only the most significant and sensitive scenic.... resources” considerably tightened the requirements for open space designation. The resources not only had to be threatened, but protection of the resource had to be “demonstrably in the public interest over the long term,” all negotiated mitigation had to be found to be inadequate to provide protection, the land had to be totally unimproved, and the landowner had to retain reasonable economic use of the property. “Improved lands” were redefined to include “structures and activities” subject to county ad valorem property taxes, rather than just “subject buildings,” and there was lingering concern about how this would be applied to forest and agriculture lands.

The CRGC was clearly concerned about the application of these criteria where there was an unwilling landowner, and even discussed requiring a two-thirds majority vote for open space designation. The

issues of landowner incentives, landowner compensation, and sunsetting¹²⁷ open space designations after a period of time were all debated. The CRGC agreed that an open space designation would require a simple majority vote, and that such designations would terminate after five years, corresponding to the time after which the entire plan would have to be evaluated. The remaining policies that elaborated on the definitions in the Act were approved as proposed.

The CRGC took up individual open space designations at its April 16 meeting. They unanimously recommended that all federal and state lands (eight sites), the White Salmon and Hood River Corridors, and the Underwood Bluff area be designated open space (Columbia River Gorge Commission, 1991f). Also to be proposed for open space were Mosely Lakes, the mouth of the Wind River, Balch Lake, the Lower Klickitat River Corridor, the Hood River to Mosier area, the Rowena Table Natural Area, and the Chenoweth Table. The CRGC agreed with CRGC staff recommendations on dropping the remaining sites. In all, open space designations were proposed for 5,710 acres of the GMA's proposed 149,499 acres, a reduction of about 5,939 acres (51 percent) as proposed in the PDMPGMA. A June 1991 CRGC update states that because comments were divided, the CRGC reduced the open space acreage by half, that all private lands designations would be reviewed in five years, and that efforts would be made to acquire or exchange lands where conflicts could not be resolved.

Open space designation proposals in SMAs were increased from 65,389 acres to 70,857 acres, and the same four designations were kept (open space for scenic areas, natural areas, wildlife areas, and cultural

128
areas). Added to SMA open space policies were statements that open space areas would be examined for their potential as research natural areas, and that national forest lands would be subject to laws and regulations of the national forest system, including NEPA and relevant forest management plans. Dropped from the open space guidelines were references to the application of an open space zone and to the expansion or reconstruction of non-conforming uses or developments. New language required a management plan for open spaces that looks at all uses, and instead of a list of conditional uses, the revised SMA guidelines included a list of uses allowable without review. Management plans could also be prepared by the landowner with agency review, as opposed to just preparation by the reviewing agency. The intent of changes seemed to be to both tighten and loosen open space requirements to make them more palatable—by requiring review of uses but with consultation with the public and by exempting some activities.

Salient comments on open space policies in the FDMP and how many times each was made are shown in Table 11.

At the FDMP public hearings stage, most public comments related to their continued displeasure over the reduction in open space from that originally proposed for GMAs in the PDMPSMA. The amount of open space was little changed from the FDMP to the management plan.

Table 11
SALIENT COMMENTS ON FDMP OPEN SPACE POLICIES

- Not enough open space/protect open space (47)
 - Open space for: Hood River Mountain (1); Columbia Hills (1); Hood River to Mosier (1); Greenleaf Basin (1); Burdoin Mountain (1); Dog Mountain (1); Catherine Creek (1); Major Creek (1); Columbia River (1)
 - Open space designation only with a willing property owner (2)
 - No open space for Chenoweth Table (1) or the Columbia River (1)
 - Sunset all open space designations after five years (1)
 - More consistency needed between GMA and SMA open space designations (1)
-

Overall Scenic Provisions

GMA Policy. The overall scenic provisions apply to all new proposed developments in the GMA regardless of whether specific provisions related to the other components apply. They were included as a framework to guide actions of federal, state and local agencies and private entities which may affect the scenic resources of the NSA.

The primary requirement is that the proposed development be compatible with its landscape setting and retain the existing landform (Columbia River Gorge Commission, 1990a). The mechanism for review is a site plan prepared by an applicant that includes the specifics of the proposal and any proposed mitigation measures. On lands visible from a KVA, the site plan was to include an evaluation of the visibility of any roads, buildings, or mining activities. New mineral resources production and quarry expansion require a reclamation plan as well.

SMA Policy. Unlike their GMA counterparts, major development actions and new industrial development on SMA lands were prohibited by section 6(d) of the Act, as was commercial development outside urban areas that would adversely affect scenic (and other NSA) resources. The main issue the NSA office had to address with regard to scenic resources was blending forest practices and the application of its visual resource management guidelines in with the requirements of the Act and the interim guidelines.

The NSA office published draft goals, policies, and management direction for resource protection and land uses for SMAs in July 1990 (U.S. Department of Agriculture, NSA Office, 1990d). The draft contained three goals and several policies for scenic resources protection. The first was the maintenance of the overall appearance and integrity of the identified landscape settings in the NSA, and five such landscapes for SMAs were included. Policies for this goal again were based on the VQOs, in that new developments and uses would be compatible with the landscape setting, and incompatible uses would not be evident to the casual observer. However, the wording of the policy on compatibility in this draft included “to the extent practicable,” a phrase that carried the potential to weaken the use of the proposed “shall be compatible” language.

The second goal stated that individual structures and other development activities blend in with the natural and cultural patterns of their immediate surroundings. Policies under this goal stated that KVAs would be the focal viewing points from which scenic effects would be evaluated, and regulations would be developed on “size, scale, shape,

color, texture, siting, height, building materials, lighting and other features” to protect scenic resources. Additionally, that development occurring in the foreground of the four major travel corridors (Washington SR-14, I-84, Historic Columbia River Highway, and Larch Mountain Road, all of which were listed as KVAs) must protect the scenic values of the corridors. The approach of using specific regulations for individual developments was in keeping with the Act’s requirements that the six counties with NSA lands would develop their own ordinances to implement goals and policies developed in the management plan. However, there was still no adequate explanation in the draft of what a KVA was nor how they were to be managed, even though this had been requested at several KCC meetings.

The third goal was the protection and enhancement of historic and landmark structures and cultural landscapes, and included language similar to that adopted by the CRGC that modifications to historic structures be consistent with the character of the original structure.

Like its counterpart for the GMAs, the goals and objectives draft for SMAs contained management guidelines that included design standards for all land uses and developments. These standards included language on size, scale, shape, color, reflectivity, texture, siting, height, building materials, lighting, and landscaping, as well as the use of topography and vegetation for screening, and on utility and access alignments. Also covered were limitations on the protrusion of structures above ridgetops, bluffs, or skylines.

Public Comment. Salient comments about on the overall scenic provisions and how many times each was made are shown in Tables 12

and 13. Because these provisions were general in nature, comments about them were directed primarily at the whole concept of scenic resources protection, from “who is going to define visually subordinate?” and “the gorge is being micro-managed to the detriment of landowners” to “protection of scenic resources should be the first priority.” Several commenters were confused about what scenic resources were, since they were not actually defined in the Act. Closely related to this were comments about the qualifications of those deciding what was scenic, since scenic interpretation is value-laden and in the “eye of the beholder.” There were a range of comments analogous to the “half-full or half-empty” idea: some said scenic values should be protected by allowing only low-impact development, while others stressed that scenic does not have to mean non-use. One commenter stated that “scenic zoning” is silly and absurd; another stated that the gorge is not a scenic resource, but is a home whose inhabitants should be respected; yet another stated that the costs of preserving the beauty of the gorge would be paid by people in the gorge for the benefit of those who pay nothing.

Between the PDMPGMA and FDMP, agriculture and forest practices and any equipment or structures (except buildings) were exempted from the new development provisions. This was not in done in direct response to public comment.

In the section on provisions for all new development, CRGC staff recommended changing the word “structure” to “new buildings” or “new buildings and roads,” and revising the exemption for small building review from 50 square feet and six feet in height to 60 square feet and no height limit (Columbia River Gorge Commission, 1991a). The former

Table 12
SALIENT COMMENTS ON GMA SCENIC RESOURCES PROTECTION POLICIES

- Gorge is being micro-managed; regulations show a lack of balance at landowners' expense; too much scenic resource emphasis (15)
 - Protection of scenic resources should be the first priority (8)
 - Standards must be established, with objective criteria; guidelines and design standards need specificity; how is "visually subordinate" defined, and by whom? (3)
 - Too much recreation at the expense of scenic resources (3)
 - Scenic easements as a management tool should be used (2)
 - The process has been frustrating; the plan dismisses the input and support of local planners (2)
 - Selectively thin/remove trees to open up views; more viewpoints needed (2)
 - Recreation resources and scenic resources can co-exist (2)
 - Local governments are already adequately protecting scenic resources (1)
 - Protect scenic resources by protecting the air quality (1)
 - The state forest practices acts are inadequate to protect the scenic values of the gorge (1)
 - No development on ridgetops or bluffs (1)
 - The management plan needs to be less prescriptive and more performance-based (1)
 - Implementation costs are too high for counties (1)
 - Gorge isn't pristine; what to do with "scenic" power lines and the Burlington Northern RR to make the gorge more scenic? (1)
-

recommendation was proposed to be more consistent with county planning reviews, and arose out of meetings with county planners. The latter reflected research into the typical size and shape of metal sheds.

Table 13
SALIENT COMMENTS ON SMA SCENIC RESOURCES PROTECTION POLI-
CIES

- Standards must be established, with objective criteria; guidelines and design standards need specificity; how is “visually subordinate” defined, and by whom? (8)
 - Not enough recognition of the VRM guidelines implemented by the USFS as required by the Act (3)
 - Scenic easements as a management tool should be used (2)
 - Bring in the National Park Service to manage; use the Cape Cod formula (2)
 - No clearcutting (2)
 - Lighting requirements are impossible to meet (2); color requirements are unenforceable (1)
 - GMA and SMA goals and objectives are too dissimilar, requiring too many separate zones (1)
 - Protect scenic resources the same as other resources (1)
 - Too much recreation at the expense of scenic resources (1)
 - A valid public involvement process is needed (1)
 - Alternatives are needed (1)
 - Protect scenic resources by protecting the air quality (1)
 - Save the viewshed around Larch Mountain (1)
 - USFS forest lands should be managed for a VQO of retention (1)
 - Reimburse for losses due to scenic regulations (1)
-

Neither recommendation was a significant policy change from the language of the PDMPGMA. The CRGC, however, allowed the larger square footage, but added back the six-foot height restriction for small

buildings. The only other change relating to scenic resources was in the¹³⁵ order of presentation of policies related to their protection.

To make the plan easier to understand, the NSA office re-arranged the design guidelines, tailoring them where appropriate to fit under each of the six landscape settings, and added language about the VQO objective for each setting. Two new policies were added stating that the VQO system would be used for evaluating all new developments and land uses, and that the VQOs identified in the Mount Hood and Gifford Pinchot National Forest plans would be used for national forest lands in the NSA. This was suggested during the public comment period. A suggestion by local planners resulted in changing the height limitation of structures for new land uses and developments from up to 75 percent of the average canopy height to remaining below the average canopy height while also considering the function of the structure. Overall, the basic thrust of SMA policies remained unchanged, in terms of what was to be regulated to protect and enhance SMA scenic resources.

Salient comments on scenic resource protection policies at the FDMP stage and how many times each was made are shown in Table 14. There were few comments on GMA policies and no subsequent changes. Three public hearings on the FDMP were held by the CRGC in September 1991. There were not near the numbers at these hearings as compared with the earlier hearings on the PDMPGMA (see Table 3, p. 97), and the comments on scenic resources protection were general with regard to the need to protect the gorge as a national treasure. A few testifiers were concerned about the relaxing of policies for development visible from KVAs, and there were a few comments on both sides of the open space

Table 14
SALIENT COMMENTS ON FDMP SCENIC RESOURCES PROTECTION
POLICIES

- Protection of scenic resources should be the first priority (20)
 - Protect scenic resources the same as other resources (19)
 - Too much recreation at the expense of scenic resources (4)
 - Protect scenic resources from quarries (4)
 - No clearcutting (4)
 - Standards must be established, with objective criteria; guidelines and design standards need specificity; how is “visually subordinate” defined, and by whom? (2)
 - The management plan lacks vision and is regulatory overkill (2)
 - Scenic easements as a management tool should be used (1)
 - Plan has no emphasis on mitigating present “scenic ills”; remove or put underground power lines (1)
 - The perspective of boaters as viewers of scenic resources is not present (1)
 - Need regulations allowing wind energy development, which can be done compatibly with scenic resources protection (1)
 - Don’t let the gorge go the way of Lake Tahoe (1)
-

designation issue. Even though all three hearings were held in gorge communities, interest seemed to be waning, which undoubtedly signified some weariness and frustration on the part of those who would be most affected by the plan.

On October 14 and 15, the CRGC held workshops on elements of the FDMP, and no public testimony was taken. The CRGC spent very little time discussing the proposed changes to scenic resources protection policies, adopting unanimously all of the recommendations for revisions

made by CRGC staff (Columbia River Gorge Commission, 1991g). The¹³⁷ deliberations on open space did not cover policy issues but centered on recommendations to include or delete particular parcels of land from open space designation. The CRGC voted in all cases to accept staff recommendations, and the only one that did not pass unanimously was for the Historic Columbia River Highway between Hood River and Mosier, an area that had drawn several public comments.

THE SIGNIFICANCE OF PUBLIC COMMENT

The purpose for the analysis of this information was to show the complexity of the management scheme for scenic resources in the NSA, to determine the level of public understanding of the elements of the scheme, and to look for evidence that public comment was incorporated into policies developed for implementing these elements.

Twice in the public involvement process, 20,000 mailers were sent out describing what the mandates were for the NSA and how the policy development process would proceed. It cannot be stated for certain why only 650 people took part in the workshops/open houses after the first mailing was sent. There was a fairly steady level of participation in the KCC process. Even so, Table 3 (p. 97) shows that out of more than 1970 comments on the drafts of the management plan, less than 20 percent contained any reference to the scenic resources of the gorge. Was the idea of a national scenic area too complex to explain? Was there an early air of resignation among gorge residents that they could not influence the development of goals and policies? Was the notion of protecting

scenic resources such an outlandish or foreign concept that it defied understanding and comment? A number of explanations are possible.

The scenic resource inventory for the NSA was based on assessment work that had been done for the 1980 study of alternatives for the gorge, and was completed by NSA office staff using the VRM system. Using an existing system facilitates implementation, as Brown et al. (1986) point out, but it also carries the potential to be resistant to public comment, since results are drafted by agency experts prior to public review. Scenic resources were summarized on a series of maps that showed landscape significance, visual absorption capacity, and landscape sensitivity. As part of the education and information exchange process, these maps were shown to the CRGC and open house attenders early in the planning process.

The record indicates the public was not specifically asked to identify patterns in the landscape they considered scenic, something which had already been done by gorge planners. The public was asked what they most liked to view and from where, and in response a fairly lengthy list of scenic vistas and prospects in the gorge was developed. However, most of these were either already under management with a scenic resource objective (on federal SMA lands) or had been identified in the inventory process as "seen" areas, or resources with special significance and sensitivity. This exercise at best confirmed which scenic resources were proposed for protection by gorge planners. An important point is that there is no definition given for scenic resources anywhere in the management plan drafts as there is for cultural, natural and recreational resources.

Scenic resources are not thought of explicitly. The concept of scenery as a resource is not well understood (because people have not given it much thought, or perhaps it is the other way around), let alone the tools developed to manage scenery. Consideration of scenic resources is by landscape design experts working in land management agencies and who have the understanding of the dimensions of the landscape. The expectation is that they would be the most influential in prescribing how the landscape would be managed. Clearly, the development of tools to address visual resources and the application of those tools were done by gorge planners,

What is interesting is that fewer than one in five gorge residents at the open houses stated they ever heard comments about the scenic beauty of the gorge from other gorge residents, when scenic beauty topped the list of comments gorge residents heard from visitors. This suggests that perhaps the scenery is taken for granted (i.e., it is related to implicitly) when one lives in a place many deem to be a national scenic treasure, or else, as Willard (1980) asserts, few people take the time or make the effort to appreciate nature's aesthetic possibilities.

Two other issues outlined by Iacofano (1990) relate to the public involvement process: low public confidence and decision bias on the part of the decision-makers. The low level of participation in the process and/or the lack of specific comments about scenic resources was perhaps indicative of public confidence in the Commission to develop a plan that balanced the Act's two stated goals. The public is seldom able to analyze the consequences of alternatives, and in this context it did not matter, because it is clear from the public record that all scenic resource

policies and alternatives had an emphasis on protection, indicating a bias in this direction. The combination of a minimal understanding of scenic resources, schemes for their management, and a sense that they were to be protected no matter what may help explain why so few comments were generated about scenic resources.

This relates to another issue raised by Iacofano (1990), concerning the technical complexity of an issue. Creighton (1981) states that issue complexity often hinders the public input process such that policy makers rely strictly on mandates in search of implementation solutions. The technical complexity of the issue revolves around the subjective nature of scenic resources, the difficulty in their identification, and the lack of a meaningful process to arrive at a consensus about scenic values, and, consequently, the management elements needed to ensure their protection as mandated by the Act. Throughout the process, the CRGC expressed the concern both about putting finished products before the public and about the needed level of understanding by the public for the elements gorge planners were proposing.

The record indicates that CRGC staff developed scenic resource protection options based on the requirements of both the Act and the interim guidelines. These options represented a few different levels of stringency for scenic resources protection within a narrow range, and the emphasis was clearly on protection. KCCs were generally supportive of using a visual subordination test except in developed settings, and this information was presented to the CRGC as staff agreeing with the public who wanted some minimum level of protection for all scenic resources in the NSA. CRGC staff also recommended expanding the list of KVAs,

although the record shows KCCs were not in favor of this. The CRGC¹⁴¹ adopted staff recommendations on both the concept of visual subordination and on expanding the list of KVAs. It is interesting to note that the CRGC failed to adopt an expanded KVA list at a later meeting because it felt that KVAs were not well understood and because there had not been enough public input.

In a similar fashion, CRGC staff developed options for how to address new development in landscape settings. There was no clear choice from KCCs on which of three options to support—only that the list of settings should be expanded beyond that in the interim guidelines. The CRGC adopted staff recommendations that new development shall be compatible with and maintain or enhance its landscape setting, and on expanding the list of landscape settings.

CRGC staff also proposed designations for open space. While initially taking no position on specific lands, the CRGC was savvy enough to provide the direction that open space was to be applied sparingly and only in instances where other scenic resource protection options were deemed to be inadequate. The record indicates that open space was not listed as a specific item discussed at KCC meetings, even though it was a highly controversial concept.

Public input received through workshops and KCC meetings had dealt with individual resource use issues—the public had been given drafts of policies relating to among other things scenic resources, landscape settings, and open space, and asked to comment on them. It was gorge planners who prepared the scenic resources inventory, defined the land use designations and landscape settings, and developed the

options for scenic resource management, and laid out the specific patchwork of management elements, all for consideration by the CRGC. And with regard to scenic resources protection objectives, the framework on which management goals and objectives hinged, the CRGC adopted virtually all of the recommendations put before it.

The CRGC in its early deliberations had to rely on its staff to provide information and explanations, because there was no specific expertise in the area of scenic resources protection. In the summary minutes of CRGC meetings it was often unclear whether CRGC rubber-stamped staff proposals or if the CRGC was instrumental in developing appropriate policy direction for staff to follow. The only sure guidance with regard to scenic resources was the sensitivity to the issue of open space designations, and this was more a function of political concerns than of consistency with the mandates of the Act. Functionally, at least initially, the CRGC was part of the lay public when it came to expertise on scenic resources, with one important difference: they were charged with the responsibility of ultimately deciding on policy for protecting and enhancing scenic and other resources of the gorge.

Abbott et al. (in press) state that NSA planners were able to document how the management plan standards reflected input received during the public review period. Beyond public input into the level of protection for scenic resources, the issue is to what extent management policies relating to scenic resources were shaped by public comment once the PDMPGMA was released.

The CRGC continued its commitment to public education by holding workshops on the PDMPGMA prior to public hearings. With regard to

scenic resources policy, the most common themes at both the workshops and the hearings were that:

- there was too much emphasis on protection, the Act's first goal, at the expense of economic development, the Act's second goal (although protection of scenic resources was the highest priority for some);
- open space should be protected (although this position, too, had several detractors); and
- the management concept of KVAs was meaningless, given how they were defined.

By way of response, the revisions to scenic resource protection policies CRGC staff recommended in most cases were cosmetic in nature. The order of presentation was changed to provide for an easier understanding of how and where the policies would apply. A much-expanded section was added addressing economic development concerns in the gorge, but the emphasis on scenic resources protection and landscape settings remained. In a move to placate property owners, the amount of proposed open space was cut by almost two-thirds, but there was little change in policy as it would apply to open space.

The single major policy change related to quarries visible from KVAs; the new policy required phasing out only those quarries visible from KVAs determined to adversely affect scenic resources, and allowed new or expanded quarries within three miles of a KVA if they passed the visual subordination test. The impetus for the change came not so much from public comment, however, but from the counties and state agency officials who worried about future sources of aggregate material, and from quarry operators who complained about excessive restriction and the possibility of having to shut down their operations.

The CRGC again held a series of public meetings on the FDMP prior¹⁴⁴ to public hearings. With regard to scenic resources policy, the most common themes at both the meetings and the hearings were that:

- protection of scenic resources should be the highest priority, and they should be protected the same as other resources;
- open space should be protected, and the original open space acreage should be restored; and
- that new quarries should not be seen from KVAs, nor should mineral development be allowed within three miles of KVAs.

In response to criticism that management plan policies would not adequately protect scenery, CRGC staff recommended that wording be added to KVA and landscape setting policy stating that new development compliance with the respective guidelines was mandatory, and this recommendation was adopted by the CRGC. There were no changes to the reduced amount of open space, in spite of the large number of comments to restore the original open space acreage. The policy of allowing new or expanded quarries was also left unchanged, except for defining what was meant by “expanded.” The CRGC also exempted the Columbia River shoreline adjacent to urban areas from the list of items to which the KVA visual subordination policy would apply. This was not expressed as a public concern, but was done at the request of port districts.

One of the complexities of the Act was the partnership created for land management. The purpose of the CRGC as a regional commission was to instill a sense of local control over land use decisions, while federal lands would continue to be managed by an existing agency, the USFS. What makes this important are the practical distinctions that were drawn during the policy development process. It is evident from

both the Act and USFS documents that a joint federal–state partnership¹⁴⁵ was to exist, but there were clear distinctions drawn between who had what authority to plan and implement on which lands. An NSA office document stressed NSA office commitment to a joint planning process, but also highlighted the mandated differences in land use decision responsibilities. The memo stated that the NSA office was completing an analysis of issues for SMAs similar to the approach being used by the CRGC for GMAs, where issues were similar in scope or focus, but that it was neither necessary nor appropriate to follow GMA procedures for issues that were unique to SMAs. This is interesting language, given the “joint process” emphasis.

This had further implications for the public involvement process. The NSA office was not required to use the public involvement process set up by the Commission, as it could have relied solely on the Federal Administrative Procedures Act process for its proposed rule-making. However, section 6(e) of the Act requires the solicitation of public comment by both the Secretary (of Agriculture) and the CRGC prior to the final adoption of the management plan. Given the level of concern about the management plan’s contents and how the plan would be implemented, as well as its experiences in preparing the interim guidelines, the NSA office availed itself of the CRGC-initiated KCC meeting process.

The NSA and CRGC offices used the same public involvement strategy, but received comments on draft management plan policy primarily through workshops and public hearings, respectively. There was no requirement for public hearings to be held on draft SMA policy.

In addition, sections 6(c)(4) and 6(c)(5)(A) of the Act required the CRGC¹⁴⁶ ultimately to incorporate into the management plan without change the management direction for land uses and development of SMA lands developed by the NSA office. This occurred twice during the process—prior to the release of the FDMP and the management plan. Legally, as long as SMA management policies were consistent with the Act, the CRGC had no say as to the contents of policies for protection of SMA scenic resources. The importance of this relates not so much to the opportunities to comment but to the receptiveness of policy makers to accommodate public concerns.

In contrast to the process of GMA policy development, the record indicates that SMA scenic resource policy development was primarily done by the NSA office. There are a couple of reasons as to why this was the case. As earlier indicated, many of the identified scenic resources were already under federal management through the national forest plans, which had already been through a public involvement process. Also, section 6(d)(5) of the Act prohibited major development in SMAs, section 6(d)(6) prohibited industrial development outside designated urban areas, and section 6(d)(7) allowed commercial development outside urban areas only if it does not adversely affect scenic and other resources in the NSA. So policy development by the NSA office for scenic resources, in comparison to the similar task faced by the Commission, was essentially an extension of mandates it already had. The Act required an explicit emphasis of protecting scenery through added regulation on designated forest, residential, and open space lands. As such, the NSA office had a smaller public involvement component for

SMA policy development. It used the periodic newsletter update to get¹⁴⁷ information out, and joined the KCC process after it was initiated by the CRGC staff.

Change in policy as a result of public comment was similar to that for the GMA policy development. Policy categories were reorganized and more detail was added. The major change was an expanded list of landscape settings, added between the July 1990 draft of scenic resources goals and what was published in the DMPSMA in October 1990. The record shows there was public support for such a list, at least from KCCs. A section was also created which listed management guidelines that would apply to all new land uses and developments, again similar to what the PDMPGMA contained. KVAs were again listed as points from which scenic effects would be evaluated, in spite of continued public questions about what the point of KVAs was and how they would be managed. Also in response to comments about the Act's requirement of using the USFS's visual resource management system, the DMPSMA contained a new statement that the system would be used to evaluate all new developments and land uses, although this was merely a restatement of existing procedure. There was virtually no change in scenic resources policy for SMAs between the FDMP and the management plan.

The amount of SMA open space lands was increased by about 6,500 acres (to 70,857 acres) for the FDMP and another 1,000 acres of open space designations were added in the management plan. There were no changes in open space policy made between the FDMP and the management plan. It is important to note that there were not near the

comments on any of the related scenic resources policies for SMAs as there were for GMAs, as Table 3 (p. 97) indicates, even though there was confusion about which policies applied to what areas. Benner (1996) stated that people believed GMA policies would be less restrictive than SMA policies, and were surprised to see how restrictive GMA policies were.

The public record indicates that the majority of those who commented at all about scenic resources did so simply by pleading for their protection, either in generic statements or by stating their concern for a particular area, which again suggests an implicit understanding of a sense of the gorge landscape. Of the three principle scenic resource protection tools, open space was most often suggested as the best method. There was not much concern over the specific criteria proposed through protection of landscape settings. Key viewing areas throughout the process were a source of confusion, and only received comment as they related to allowances for expanded or new quarries. Again, a number of explanations are possible. Gorge residents were most articulate in their concern over limitations on residential and commercial development and on proposed restrictions on timber and agricultural practices, reflecting the traditional views of property rights and land use for commodity production, as opposed to non-traditional non-consumptive land and resource uses. These higher priorities, along with the complexity of and an aversion to the proposed management scheme and lack of familiarity with the specifics of the gorge (by non-residents), may explain why so few respondents commented on scenic resources.

Beyond just comments on gorge resources, the public record contained a large number of comments about feasibility of managing an area for scenery, let alone the constitutionality of the proposed management scheme. This lends support to Stone's (1988) contention that a dichotomy often exists between objective interests and concerns, which actually affect people, and subjective interests and concerns, which people only believe will affect them. The proposed regulations were perceived as unfair by many gorge residents who argued the regulations would benefit those who would not be subject to such regulations while the costs in terms of economic opportunity and personal freedom would be borne by gorge residents. The debate over the costs and benefits of the NSA overshadowed discussions of particular resources. As possible follow-up research it would be interesting to compare how people thought they would be affected with what has actually happened to them. This may be part of the effort to meet the requirement of management plan evaluation which will occur in 1996-97.

Because of the complicated nature of the management scheme, the CRGC was clearly concerned that the public be fully involved at every step of the policy development process. KCCs as well as the CRGC were given scenic resource protection options prepared by CRGC staff to respond to. These were presented as a way to demonstrate some flexibility in the Act, but were nevertheless oriented to the Act's first goal of protection and enhancement. In many cases there was no clear choice among KCCs regarding the available options. In most cases the CRGC with minor changes endorsed the recommendations made by its staff.

Not everyone was pleased with the process. Near the end of the policy development process, one commenter stated he was disappointed that "the consensus of KCC meetings" was not incorporated into the plan, and another flatly stated "the CRGC has had a disappointing public involvement process" to which was added "the CRGC had not adequately judged public attitudes." Another commenter stated that in her opinion few planning processes have had so much public involvement, so it was not for lack of opportunities to participate.

The CRGC discussed public involvement right up to the adoption of the management plan. There was considerable debate about a lengthy public review of the FDMP, including whether or not to hold more KCC meetings. The concern was over raising the public's expectations that management direction for the gorge could be changed by those who were opposed to it. The sense of the CRGC seemed to be that the public input process had worked well. One commissioner estimated that generally the CRGC had accommodated 70–80 percent of public comments.

Conclusions

It cannot be stated with certainty whether or not public input was influential in defining and shaping scenic resource management policies. Part of this relates to the limitations of relying on secondary data sources to reconstruct actual events. There were also a few instances where there were gaps in the public record, which meant relying on the recollections of those who were part of the process.

The public record indicates that at most policy development steps, the public and the CRGC reacted and responded to information generated by gorge planners. An analysis of changes in scenic resource

policy in the various drafts of the management plan has shown that little¹⁵¹ of substance was changed, once the basic protection framework was adopted. The direction of management plan policies was dictated by the Act, and there was little fine-tuning of scenic resource protection goals once the primary management framework had been established.

Of the three major policy changes at the FDMP stage—the reduction in GMA open space, the allowance of quarries within three miles of a KVA, and the deletion of visual subordination guidelines for urban waterfronts—the first two were generally disapproved of by the public, and the latter one was not a general public request. What is also of note in this context is that policies were often fine-tuned based on the CRGC's first-hand experience with the application of the interim guidelines. The CRGC usually adopted what its staff recommended, but policy language remained untested. Benner (1996) stated that the CRGC would often make changes to policies after they were forced to hear appeals of permit denials. This appears to be as much or more of a tool for overcoming the CRGC's difficult learning curve than the input of either staff or the public.

An analysis of both the quantity and the quality of public input into the NSA management plan was significant in a couple of different ways. Contrary to Willard's (1980) notion that people do not give landscape aesthetics much thought, there was every indication that people who commented, whether they lived in the gorge or not, had given the gorge some thought, by virtue of the opinions expressed or the way they were expressed. This was a self-selected group, however, and generalizations cannot be made to the population at large. It can also be confirmed that

scenic resources as a concept are difficult to identify and define, which¹⁵² helps explain the complexity of the scenic resources inventory process and the patchwork of regulation developed to protect scenic resources. It is most significant that the management plan for a scenic area contains no definition of scenic resources.

In this context, the issue still remains as to what exactly is being managed in the landscape. There are two important points here. One relates to the purposes for which lands are managed. The gorge by definition is a working landscape, a cultural landscape, a work in progress. This begs the question of what is the public interest in scenery, and for what public purposes landscapes are maintained. People visit the gorge primarily to recreate, and the fact that people who commented on gorge resources spoke most often about recreational resources reinforces the connection between the purposes for recreation and surroundings in which it takes place. This in turn has implications for resource management agencies for the development and implementation of appropriate governance structures that address not only the economics of recreation but the aesthetics of recreation. As was stated earlier, agencies traditionally have not done much with the psychological and behavioral aspects of responses to aesthetics, but have concentrated on on-the-ground manipulations of the landscape to implement agency-generated visual quality objectives. The link to recreation could serve as a focal point, as it did in the Tahoe Basin, for new thinking about the function of landscape quality in relation to landscape use.

The more important issue relating to the public interest relates to who sets the agenda and who influences the outcome. Clearly there were forces at work in the development of the management plan that were not part of the public record. The CRGC was very concerned that policy drafts not appear as finished products, yet they adopted most of what CRGC staff presented them, and in spite of public outcry in some cases, policy drafts changed very little throughout the process. The direction of the process, i.e., an emphasis on the Act's first goal, was set early on. The push to preserve the gorge came in large measure from outside the gorge. With the creation of the NSA, all those who were opposed to more regulation in the gorge could do was hope for some balance between the Act's goals, knowing that they were faced with the imposition of a new comprehensive landscape protection policy.

The significance comes in the purpose, meaning, and effectiveness of a public involvement process when the outcomes are pre-established, and what this means for participation in a democratic society. Newell (1996) stated that many people chose not to participate, believing that the planning effort would "go away" if they did not involve themselves with it. In spite of a large number of public input points, the CRGC stuck fairly close to the protection mandate of the Act. The lack of an explicit public understanding of scenic resources and the absence of an explainable definition of them resulted in the complex management scheme for scenic resources that could not have been developed to meet the mandates of the Act except by expert gorge planners.

Chapter VII

DIFFERENCES IN COMMENTS OF VARIOUS “PUBLICS”

INTRODUCTION

In the last chapter it was concluded that public input into the scenic resources protection strategies was not a major determinant in the outcomes of the particulars of such strategies, based on documentation in the public record. Less than one in five people commented about any of the four strategies for scenic resources protection. This is because scenery is neither well-defined nor understood in an explicit sense. Given this lack of understanding, and in the context of an area that already had considerable development, the result was a complex patchwork of overlapping policies that purport to protect subjective scenic values with objective regulation. Where development pressure is not high, neither is the complexity of regulation.

Looking at all public comment together, however, is too broad an approach to understanding how it was used. An understanding of natural resource decision-making requires some level of understanding of who the stakeholders are and what views they hold. The third element in this research was to examine stakeholder views in the policy

development process, and to analyze the comments for differences in perspectives on scenic resources.

Francis (1990) states that the most commonly employed theoretical construct in natural resources studies is group theory, which focuses on relationships among interest groups and policy-makers, but he also suggests the use of social psychological models that look at who holds what environmental values and elite/hierarchical models that look at who benefits and who pays as a result of natural resources prescriptions. With specific regard to scenic resource policy, Daniel (1990) states that public perceptions are important in the development of scenic resource management schemes.

Walker's (1991) work on interest groups stresses the importance of why groups form around issues, and states that business groups and governmental agencies play important roles in the lobbying system. Interest groups were formed around the idea of a national scenic area. A key question is whether their policy concerns were addressed any more than the more diffuse public-at-large.

The overall management strategy of protection was dictated by the Act and embraced early on by the CRGC. Policy development proceeded to emphasize the Act's first goal. The PDMPGMA contained one page (out of 260) on economic development in the gorge. Those opposed to gorge regulation were doubly distressed by the lack of attention paid to gorge residents. This issue helped define the comments of the various stakeholders.

Definitions of Publics

The public record for the management plan contained responses from a diverse group of agencies, local officials, groups, and individuals. Both the public record maintained for SMA policy development by the NSA office and that maintained for GMA policy development by CRGC staff were examined. The NSA office catalogued responses as coming from agencies, interest groups, and the public-at-large. CRGC staff did not catalog the responses they received. All responses containing comments about scenic resources (protection, landscape settings, KVAs, or open space) were reviewed for this study before any attempt was made to categorize them by source. The categories defined below are mutually exclusive.

In the last chapter the issue was raised of defining the relevant community, relating to the question of who is entitled to participate in a democratic process of decision-making. Evident in the public record was a sense of much greater interest in preserving the gorge by those who did not live there, but who only came to visit. In theory, those who bear the costs of pro-resource or anti-resource decisions because of proximity to the resource will differ in views from those who benefit but incur no direct costs (Francis, 1990). To examine if this was relevant to the development of the management plan, responses without any affiliation were categorized as "gorge resident" or "non-gorge resident," for comparison.

As stated above, interest groups are important in any policy-making process, and one role of policy-makers is to reconcile the conflicting interests of organized groups. Interest groups are often articulate and

specific when it comes to making comments, especially if there are collective threats to the particular interests around which they are formed.

At least three important gorge advocacy groups were formed. In 1979, a group of mainly gorge residents formed the Columbia Gorge Coalition (CGC), headquartered in White Salmon. The CGC advocated strong protection of gorge scenery and the creation of a national scenic area. They were also unabashed in their support for the NPS as the lead management agency, believing it was the only agency which could adequately protect the gorge. The CGC believed local governments in the gorge were the problem rather than the solution to gorge problems.

In 1981, the Friends of the Columbia Gorge (FOCG) was formed. It was a group of mostly non-gorge residents whose mission is "vigorous protection of SNCRs in the NSA" (Friends of the Columbia Gorge, 1994). FOCG played a major role in lobbying for gorge legislation, and drew most of its political strength from the Portland area. It would be a major player in the application of the interim guidelines and in the development of management plan policies.

Columbia Gorge United (CGU) was formed in 1981 in Stevenson, Washington, the Skamania County seat, to oppose any special designation for the gorge, let alone any additional regulation. Unemployment was high in Skamania County with an increasing loss of timber jobs, and CGU believed scenic resource regulation was the last thing that was needed. A good deal of CGU's influence was co-opted with the building of Skamania Lodge in Stevenson, which sharply improved the employment situation in Skamania County.

Because of the diversity of resource issues in the gorge, and the fact¹⁵⁸ that at least three interest groups were formed specifically around gorge issues, responses from interest groups and coalitions of any sort comprised a third “public.” Interest groups that commented were located primarily outside the NSA.

Finally, responses from all government agencies were examined, and split into two categories. NSA counties, which had the ultimate management plan implementation responsibility, comprised one category. It was expected they would have a great deal to say about implementation problems from the local perspective. Responses from other government agencies made up the other category. These were primarily federal and state agencies, and were split out because these agencies would have no direct involvement in implementation. Comments from other agencies can be thought of as a cross between those of NSA counties and those of interest groups, in that other agencies were concerned about implementation issues, but only from their narrow mission perspectives.

Table 3 (p. 97) showed there were 385 responses containing comments on scenic resource protection strategies. Table 15 shows how the 385 responses received on scenic resources break down according to these five categories of stakeholders. It is evident that there was much greater interest for all identified publics in GMA scenic resources policy than in SMA scenic resources policy at the preliminary management plan stage. This was to be expected because most of the GMA lands were in private ownership. The newly-created CRGC had no track record for land management, but responded to strong protection and

enhancement mandates of the Act as a guide for developing scenic and¹⁵⁹ other resource policies that would apply to private land. By contrast, the USFS had a major presence in gorge management. Its national forest lands in the gorge already had a scenic component at the time such lands were designated as SMAs, and it would use its existing VRM guidelines as a basis for assessments and subsequent policy development.

Table 15
BREAKDOWN OF THE 385¹ RESPONSES THAT MENTIONED SCENERY, OPEN SPACE, KEY VIEWING AREAS, OR LANDSCAPE SETTINGS

GROUPING	(PRELIMINARY DRAFTS)		
	DMPSMA	PDMPGMA ²	FDMP ³
Public/Gorge Resident	10	79	34
Public/Non-Gorge Resident	16	49	65
Interest Group	11	33	11
NSA Counties	6	19	5
Other Agencies	3	16	6
Residence Unknown	—	20	2
TOTALS (385)	46	216	123

1. From table 3 (p. 97), the number of responses containing comments about scenic resources, open space, KVAs, and/or landscape settings.
2. Subject responses to the PDMPGMA received at the CRGC office and at public hearings. There were no public hearings on the DMPSMA.
3. Subject responses to the FDMP received at the CRGC and NSA offices, and at public hearings.

Table 15 depicts only the number of responses containing one or more comments about scenic resources and the policies proposed to manage them. The question is what differences exist, if any, in the

content of comments made about scenic resources by identified group,¹⁶⁰ and what potential explanations there are for these differences.

Definitions of Comment Categories

With the relevant publics identified, the next step was an analysis of all comments about scenic resources to determine if different values, attitudes, or perspectives were evident. The review of the record revealed a wide variety in the level of detail about scenic resources. Four identifiable categories of comments emerged from this review, ranging from the generic—passionate pleas to protect the scenic beauty of the gorge as a national resource—to the specific—comments about scenic resource regulations, criteria, and standards. These four categories are summarized below. Comments in each category included those both in support of and critical of the relevant issue.

The most general comments about scenic resources were included in a generic category. Commenters generally were adamant that the scenic beauty of the gorge be protected because the gorge is a national treasure, that the scenic splendor of “this unique landscape” be protected for enjoyment for future generations. Comments in this category contained no particulars about how scenic resources should be protected, and no mention of landscape settings, open space or KVAs.

The second identifiable category included comments with any mention of general scenic resource protection, including the concepts of landscape settings, open space, and KVAs. This category was chosen to separate the generic statements asking for protection from those that addressed specific items proposed in the plan, demonstrating that commenters 1) had reviewed the various drafts and/or had participated

in the planning process, and/or 2) had perhaps some idea how scenic resources were proposed to be managed. Comments in this category generally favored the concept of landscape settings, requested a better explanation of and fewer KVAs, and included arguments both for and against the designation of open space. This category also included comments on resource use conflicts—several commenters stated that there was too much emphasis on recreation resources they believed at the expense of scenic resource protection.

The third category also included comments with any mention of general scenic resource protection, but only if they included specific locations in the NSA. This would indicate some familiarity with the scenic resources of the gorge. There were a large number of comments in this category, related mostly to the designation of particular areas and features as open space, but there were a few comments on scenic travel corridors and the addition of specific KVAs.

The last identifiable category included comments about specific goals, policies, and standards. This category indicates some level of specific knowledge about scenic resource management practices on the part of commenters, and goes beyond just the mention of scenic resource protection tools and locations. Comments in this category ranged from the general—define visually subordinate; objective design standards are needed; reference is needed to VRM guidelines of the USFS—to the specific—color requirements for structures and some signage regulations are unenforceable; building height restrictions in some landscape setting make no sense.

THE PDMPGMA AND DMPSMA STAGES

The two draft management plans, one for the GMAs and one for the SMAs, for the first time contained all policies for their respective lands in a single document. To this point, comments had been made mainly through KCC meetings, and then only on one or two issues at a time. The various stakeholders in the gorge now saw the entire array of policies to address scenic and other resources in the gorge.

Table 16 shows the comments that were made by those who responded to both the PDMPGMA and the DMPSMA; comments were combined for content analysis purposes, but the data are presented here to show differences in response rates for both documents. Comments on the draft management plans were split from those on the FDMP because of some major policy changes at the FDMP stage. As a start toward making comparisons among publics, individual comments were further categorized as either supportive of (positive) or critical of (negative) a particular policy type. This information is included in subsequent tables that break down information in Table 16 by scenic resource protection strategy.

Table 16 reveals a number of things. As with the number of respondents on scenic resource policies, the number of comments was also much higher for GMAs—312 (77%) of the 405 total comments. Thirty-two percent of comments (130 of 405) mentioned a general scenic resource protection concept; 24 percent (98 of 405) were generic statements for or against gorge preservation.

Table 16
NUMBER OF COMMENTS BY COMMENT CATEGORY, FOR IDENTIFIED PUBLICS:
PDMPGMA AND DMPSMA STAGES

Group	Generic Statements		Mention of Scenic Resource Concepts		Mention of Specific Places		Mention of Specific Standards		Totals ¹	
	SMA	GMA	SMA	GMA	SMA	GMA	SMA	GMA	SMA	GMA
Public-Gorge (89) ²	7	37	3	28	1	26	2	15	13	106
Public-Non-Gorge (64)	3	27	9	19	4	17	11	2	27	65
Interest Groups (44)	4	13	10	26	6	7	9	8	29	54
NSA Counties (25)	1	4	3	20	0	11	15	18	19	53
Other Agencies (19)	0	2	0	12	0	4	5	16	5	34
Total Comments	15	83	25	105	11	65	42	59	93	312

1. There were 405 comments from 242 respondents; 20 respondents whose place of residence could not be identified are not included.

2. The numbers in parentheses are the number of responses by identified public; from Table 15, page 159.

The gorge public had the most to say about GMA scenic resources policy, but, with the exception of non-NSA county agencies, the least to say about SMA scenic resources policy. The gorge public was commenting on GMA proposals that would directly impact them, but they understood that SMA policy applied primarily to federal land and would not have such direct impacts. For GMA policy, the numbers of positive and negative comments for the gorge public were fairly evenly split, whereas most of the non-gorge public comment was supportive of proposed policies. The gorge public also had the largest share of comments (106 out of 312), which is logical since they would be the most affected by whatever was ultimately adopted by the CRGC. Most of the comments on GMA policy by the two agency groupings were negative.

For SMA policy, most comments by the gorge and non-gorge publics were favorable, and, as stated previously, this may be explained by the management of the USFS that already existed in the gorge. Interest groups, however, had the most comments about SMA scenic resources, because of the importance of the availability of natural resources in the gorge. Just as with GMA policy, only the two agency groupings had more negative than positive comments overall. This was fairly consistent throughout, as NSA counties looked ahead to issues of implementation and other agencies sought to avoid impacts to their programs (e.g. forest practices regulation, the availability of aggregate for highways, etc.) from scenic resource regulation.

Table 16 does not indicate what specifically the various publics commented on, as it combines the individual scenic resource protection policy strategies. What is more revealing than whether a particular

public favored or opposed a particular set of policies is what the particular public favored or opposed.

The Gorge Public

Table 17 shows the breakdown of the 119 comments made by the gorge public by scenic resource management strategy. The majority of the comments the gorge public made on scenic resources protection fell into two areas. The most comments (44 of 119; 37 percent) were generic statements. These were about evenly split between the desire for protection of scenic resources and the need to develop a plan much more in tune with local desires. Those in favor of protection generally touted the gorge as a place to enjoy exquisite beauty, stating that the scenic resources of the gorge should be the first priority. Those critical of the draft management plans stated they were heavy-handed, elitist, burdensome, unconstitutional, insulting to gorge residents, and favoring scenic resources at the expense of recreational opportunities, and otherwise ignoring the wishes of gorge residents (see Table 12, p. 133). There still was a significant amount of support for keeping the gorge as it is from the people who lived there. However, most of those on whichever side of the issue lived in urban areas exempt from NSA regulation. Follow-up research on actual residence location, employment, and job location would shed additional light on this issue.

Table 17
GORGE PUBLIC COMMENTS¹ BY SCENIC RESOURCES
MANAGEMENT STRATEGY: PDMPGMA AND DMPSMA STAGES

	General SR Protection	Open Space	Landscape Settings	KVAs
Generic Statements²	44; 21+ 23–	N/A	N/A	N/A
Mention of SR Concepts	3; 2+ 1–	20; 9+ 11–	0	8; 1+ 7–
Mention of Specific Places	2; 1+ 1–	25; 18+ 7–	0	0
Mention of Specific Standards	13; 5+ 8–	1; 1+ 0–	0	3; 1+ 2–
Totals (119)	62	46	0	11

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

The other category that drew a lot of comment was the use of open space designations as a protection measure (45 of 119; 38 percent); there were 20 comments that mentioned the use of open space, and 25 comments for or against the designation of specific locations as open space. Curiously, the use of open space as a concept drew about equal numbers of supporters and opponents, but those who suggested specific locations for open space well out-numbered those who were opposed to specific locations. Open space was seen as both a way to protect the scenic beauty of the gorge and as potentially burdensome to landowners, but gorge residents did favor open space designations for specific locations.

There were not many comments from the gorge public on the subject¹⁶⁷ of key viewing areas, but most comments were in opposition to KVAs. This is consistent with repeated requests during the KCC meetings and CRGC workshops to better define KVAs and explain how they would be managed. The perception that the entire gorge could be seen from KVAs coupled with policy language stating they would be the focus of the most restrictive standards were the reasons for opposition to KVAs as a management concept.

There were no comments from the gorge public on proposed landscape settings and policies to ensure visual subordination of new development and land use activities. This is noteworthy, since landscape setting policy was repeatedly touted by CRGC staff and was described in the draft management plans as the basis for protecting scenic resources in the NSA. However, landscape settings were based on tangible resources and looked very much like zones in the traditional sense. It is likely that this fact, along with the more controversial nature of KVAs and the specter of open space designations were more important and immediate issues.

Only 14 percent of the comments (17 of 119) mentioned specific scenic resource protection standards. This is also due to a focus by gorge residents on other more important issues. Overall, for the gorge public, positive comments and negative comments were evenly split.

The Non-Gorge Public

Table 18 shows the breakdown of the 92 comments made by the non-gorge public by scenic resource management strategy. Similar to the gorge public, comments by the non-gorge public were mostly in two

areas. The most comments (30 of 92; 33 percent) again fell into the general resource protection category, and were generic statements. However, Table 18 indicates that the non-gorge public overwhelmingly favored general protection of the scenic resources of the gorge. The main positive theme was that the natural beauty of the gorge is enough by itself to warrant protection, and that first priority should be given to scenic resources consistent with the Act. Opponents argued that recreational opportunities were being limited and a few stated that scenic beauty in the gorge had long been degraded because of the development in the gorge. Interestingly, this latter point was not raised at all in so many words by the gorge public, perhaps because their concept of scenic beauty in the gorge included the development already there. This relates specifically to people's experiences with scenery and Whyte's (1968) concept of the need to see the beauty in more ordinary landscapes. Based on the 1988 workshop results reported earlier, it may also mean gorge residents take scenery for granted.

Interest groups made proportionately fewer generic statements about the need to protect the gorge, instead focusing on specific provisions of the scenic resource protection strategies. As expected, most of the negative comments came from those whose access to or use of natural resources in the gorge was to be limited by the proposals to protect scenic resources. For example, the Columbia Gorge Boardsailors Association found the draft plans to be overly biased in favor of scenic resources to the detriment of the use of recreational resources, and the Mid-Columbia Small Woodlands Association found fault with the proposed restrictions on the uses of forest lands because of the lack of

Table 18
NON-GORGE PUBLIC COMMENTS¹ BY SCENIC RESOURCES
MANAGEMENT STRATEGY: PDMPGMA AND DMPSMA STAGES

	General SR Protection		Open Space		Landscape Settings		KVAs	
Generic Statements²	30;	23+ 7–	N/A		N/A		N/A	
Mention of SR Concepts	4;	4+ 0–	14;	8+ 6–	5;	5+ 0–	5;	4+ 1–
Mention of Specific Places	1;	1+ 0–	13;	11+ 2–	0		7;	6+ 1–
Mention of Specific Standards	3;	2+ 1–	0		3;	3+ 0–	7;	7+ 0–
Totals (92)	38		27		8		19	

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

specific review guidelines and documentation of impacts to scenic resources from forest operations.

Similar to the gorge public, the other category that drew a lot of comment was the use of open space designations as a protection measure (27 of 92; 29 percent). The non-gorge public, however, was supportive both of open space as a concept and of specific open space designations. Again, the difference can be explained in who would bear the burden of open space designation.

Unlike the gorge public, the non-gorge public commented on landscape settings, and in support of them. The most common comment was that more landscape settings were needed to prevent the loss or

degradation of the landscape, and the comments were aimed primarily at¹⁷⁰ SMAs. This showed that the non-gorge public recognized the value and level of sensitivity of SMA resources, which is exactly why these lands were so designated.

Proportionately, the non-gorge public had more comments about KVAs (19 of 92; 21 percent) than the gorge public (11 of 119; 9 percent), and by comparison the comments for the non-gorge public were much more supportive of KVAs as a management concept. As Table 18 indicates, the comments were about split between general support for KVAs and for inclusion of specific places on the list of KVAs. The concept of KVAs as a discriminating management tool was still not well understood, yet it sounded like an excellent idea to keep any more development from occurring in the NSA.

Fourteen percent of the comments (13 of 92) mentioned specific scenic resource protection standards, compared to 11 percent for the gorge public. A major difference, however, is that 80 percent of non-gorge public comments were positive, compared to 50 percent of gorge public comments.

Interest Groups

Table 19 shows the breakdown of the 83 comments made by the interest group public by scenic resource management strategy. There were a third fewer responses for interest groups than for the non-gorge public (44:65), but about the same number of comments (83:92).

Table 19
INTEREST GROUP COMMENTS¹ BY SCENIC RESOURCES
MANAGEMENT STRATEGY: PDMPGMA AND DMPSMA STAGES

	General SR Protection		Open Space		Landscape Settings		KVAs	
Generic Statements²	17;	7+ 10–	N/A		N/A		N/A	
Mention of SR Concepts	7;	3+ 4–	18;	13+ 5–	4;	4+ 0–	7;	1+ 6–
Mention of Specific Places	1;	1+ 0–	9;	8+ 1–	0		3;	3+ 0–
Mention of Specific Standards	13;	8+ 5–	0		1;	1+ 0–	3;	1+ 2–
Totals (83)	38		27		5		13	

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

Like both the gorge and non-gorge publics, interest groups also commented on the use of open space designations, generally favoring it as a concept, and very much supporting the inclusion of specific locations as open space. This is not surprising, since most of the interest groups who commented were oriented toward the use of natural or recreational resources. Little was said about landscape settings, the basic management units for the protection of scenic resources; the only comments favored additional landscape definitions.

Along with the gorge public, interest groups were generally not supportive of KVAs, believing them to be too inclusive in terms of area

and too broad and vague as far as specific management strategies.

Again, it was those respondents who had negative perceptions of the scenic resource protection provisions (and for that matter the entire draft management plan) who were critical of the concept of KVAs. The public record is unclear as to whether or not this was a call to develop a more site-specific flexible set of regulations to replace the concept of KVAs.

Interest groups focused more on specific standards than either the gorge or non-gorge publics, and most comments pertained to the SMAs. The comments, both positive and negative, were related primarily to forest practices and the relationship between proposed standards and the non-likelihood of continued protection of scenic resources. Some doubted the USFS VRM system would protect scenic resources in the gorge; others wanted bans on clearcutting on SMA lands. These issues pre-dated the passage of the Act and several interest groups were hoping the provisions of the Act would assist in the effort to reduce the level of timber-harvesting.

NSA Counties

Table 20 shows the breakdown of the 72 comments made by either the NSA county commissions or their planning departments. In spite of the there being only six NSA counties, the input regarding scenic resources (and the draft management plans) was substantial.

Table 20
NSA COUNTIES COMMENTS¹ BY SCENIC RESOURCES
MANAGEMENT STRATEGY: PDMPGMA AND DMPSMA STAGES

	General SR Protection		Open Space		Landscape Settings		KVAs	
Generic Statements²	5;	1+ 4–	N/A		N/A		N/A	
Mention of SR Concepts	4;	1+ 3–	12;	0+ 12–	4;	4+ 0–	3;	1+ 2–
Mention of Specific Places	1;	1+ 0–	6;	0+ 6–	1;	0– 1+	3;	1+ 2–
Mention of Specific Standards	13;	7+ 6–	0		11;	6+ 5–	9;	1+ 8–
Totals (72)	23		18		16		15	

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

Almost half of the NSA county comments dealt with the specific policies; no other group came close to this proportion of comments. This was expected, since the counties were required to develop ordinances based on the final management plan in order to implement it. There were few general statements of the need to protect the gorge, in contrast to the gorge, non-gorge, and interest group publics. Two-thirds of the comments (49 of 74) were negative.

NSA counties were critical of open space designations. Essentially, the NSA counties wanted only public lands designated as open space, or else designation of private lands only with the landowner's consent. It was requested that several areas proposed for open space not be

designated as such. The nature of these comments indicates the NSA¹⁷⁴ counties were clearly worried about takings and other legal issues.

Many comments mentioned the unenforceability of standards, such as those for lighting and structure color. The lack of objective standards, the lack of specificity for guidelines and design standards, and no implementable definition of "visually subordinate" were the most salient comments. These comments applied to scenic resource protection measures as well as to landscape settings and KVAs. These comments recall Rein's (1976) fact/value dilemma, a critical problem in trying to create and then legislate a system of values. Without adequate definitions and enforceable standards, the use of local police powers is fraught with uncertainties.

There were positive suggestions made by the NSA counties, including the use of mitigating measures, support for scenic travel corridors, and consideration of scenic easements. These indicated the necessity of having flexibility built into the protection policies the NSA counties believed was essential for any change at successful implementation.

Other Agencies

Table 21 shows the breakdown of the 39 comments made by other governmental agencies and officials. For the most part, other agency comments mirror those made by the NSA counties. Sixty-four (64) percent of the comments on scenic resources were negative.

The use of open space on private lands was taken to task at the public hearings but there was some support for designating the Hood River to Mosier bluffs as open space. As with the NSA counties, other agencies commented on specific proposals. For example, the Oregon

Table 21
OTHER AGENCIES' COMMENTS¹ BY SCENIC RESOURCES
MANAGEMENT STRATEGY: PDMPGMA AND DMPSMA STAGES

	General SR Protection		Open Space		Landscape Settings	KVAs	
Generic Statements²	2;	1+ 1-	N/A		N/A	N/A	
Mention of SR Concepts	4;	2+ 2-	5;	0 5-	0	3;	1+ 2-
Mention of Specific Places	0		4;	3+ 1-	0	0	
Mention of Specific Standards	6;	1+ 5-	0		5; 3+ 2-	10;	3+ 7-
Totals (39)	12		9		5	13	

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

Departments of Transportation (ODOT) and Geology and Mineral Industries (DOGAMI) and the City of The Dalles, in their comments on proposed screening requirements, all expressed concern about future sources of mineral aggregate resources, especially from areas visible from KVAs. The Oregon State Forester also stated that his department did not have the expertise on many of the standards relating to cultural and scenic values, and could not regulate outside the constraints of the Oregon Forest Practices Act. The issue of regulation of forest practices was one that was discussed at many meetings between the CRGC and the Oregon Department of Forestry and the Washington Department of Natural Resources. The Washington Departments of Transportation and

Agriculture commented on the need for flexibility in the river bottomlands, pastoral, and rural landscape setting policies because of ongoing agency activities and resource lands uses.

In addition, other agencies provided input on issues not mentioned in the draft management plans. For example, the Oregon Department of Environmental Quality brought up the need to protect the air quality within the gorge so that scenic resources would continue to be visible. The Historic Columbia River Highway Citizens Advisory Committee requested a scenic and historic easement program to ensure the compatibility of any design changes with the style of the highway.

The significance of comments made was that they were primarily restatements of agency mission, as opposed to contributing further suggestions for policy modification.

THE FDMP STAGE

A content analysis of the comments made at the preliminary draft management plan stages for GMA lands and SMA lands revealed some identifiable differences between commenting “publics” in terms of the subjects of comments made and whether or not they were supportive of proposed scenic resources protection policies. These comments relate to the perceptions of threats to gorge resources and their uses and further to a general understanding or lack thereof of policy responses provided by gorge planners.

In this section the comments made on the final draft management plan (FDMP) are analyzed to determine if any discernible differences exist among identified stakeholders at this stage.

Table 15 (p. 159) shows the breakdown of responses mentioning one¹⁷⁷ or more of the proposed scenic resource protection concepts in the FDMP, which contained policies for both SMAs and GMAs. Table 22 shows the number of comments that were made by those who responded to the FDMP. There was almost no distinction among the publics at this point between GMA and SMA policies, so no breakdown between policies for the two land areas was possible.

Coding of comments as positive or negative at this point presented a problem, because there were virtually no comments made directly supporting the scenic resource policies of the FDMP, even though there was widespread support for protection of scenic resources in the gorge. For example, a comment on not allowing clearcutting and a comment critical of weakened scenic resource protection policy language in the FDMP were coded as negative, while a comment on giving scenic resources protection equal to that of other resources is positive, yet also critical. The problem was solved by analyzing the comments in relation to the language of the FDMP, in effect assuring that most comments were critical of FDMP scenic resources protection proposals. Most respondents were not opposed to scenic resources protection, but there were those who believed the FDMP either contained a distinct lack of protection or overly favored protection strategies, and both were critical of FDMP policies.

Table 22
NUMBER OF COMMENTS BY COMMENT CATEGORY, FOR IDENTIFIED PUBLICS:
FDMP STAGE

Group	Generic Statments	Mention of Scenic Resource Concepts	Mention of Specific Places	Mention of Specific Standards	Totals ¹
Public- Gorge (34)²²	26	30	7	8	71
Public- Non-Gorge (65)	46	68	4	8	126
Interest Groups (11)	2	11	4	3	20
NSA Counties (5)	1	7	0	5	13
Other Agencies (19)	0	4	1	3	8
Total Comments	75	120	16	27	238

1. There were 238 comments from 121 respondents; 2 respondents whose place of residence could not be identified are not included.

2. The numbers in parentheses are the number of responses by identified public; from Table 15, page 159.

Table 23 shows the breakdown of the 71 comments made by the gorge public by scenic resource management strategy. Thirty-seven percent of the comments were generic, with a much higher percentage favoring protection of scenic resources and criticizing the policies. Those who were not supportive either believed the FDMP did not afford scenic resources adequate protection, or were hostile to the entire concept of the scenic area and any attempt to further “manage” it.

Table 23
GORGE PUBLIC COMMENTS¹ BY SCENIC
RESOURCESMANAGEMENT STRATEGY: FDMP STAGE

	General SR Protection		Open Space		Landscape Settings	KVAs	
Generic Statements²	26;	6+ 20–	N/A		N/A	N/A	
Mention of SR Concepts	1;	0+ 1–	20;	1+ 19–	0	9;	1+ 8–
Mention of Specific Places	1;	1+ 0–	3;	2+ 1–	0	3;	1+ 2–
Mention of Specific Standards	3;	0+ 3–	0		1; 0+ 1–	4;	0+ 4–
Totals (71)	31		23		1	16	

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

Oddly enough, the gorge public was critical of open space (23 percent of comments made), with 14 of the 16 comments made on open space (87 percent) critical of the reduction in proposed open space

designations. This contrasts sharply with comments on open space made¹⁸⁰ on the preliminary drafts, which questioned the use of open space at all. Also, unlike earlier comments, there was little mention of designating specific places as open space. Of the 23 comments made on KVAs, 20 (88 percent) criticized the allowance of quarries within three miles of KVAs. There were also few negative comments about specific standards, and only one mention of landscape settings.

The Non-Gorge Public

Table 24 shows the breakdown of the 126 comments made by the non-gorge public by scenic resource management strategy. At this point the non-gorge public was the most outspoken about protecting scenic resources.

Like the gorge public, thirty-seven percent of the comments were generic. The non-gorge public also was explicit in their comments that gorge scenery should be protected for future generations, and that it did not like the weakened language of the FDMP. The non-gorge positive comments touted the need to protect the gorge for its scenic beauty; the negative responses were critical of the FDMP for not emphasizing protection of scenic resources.

Like the gorge public, the non-gorge public was openly critical of open space and KVA policies. Of the 35 comments on open space, 32 (94 percent) were critical of the reduction in proposed open space designations from the preliminary drafts. Of the 36 comments on KVAs,³⁴ (91 percent) criticized the allowance of quarries within three miles of KVAs. In contrast to the non-gorge public, those who lived in

the gorge and favored protection were not pleased about how they perceived the FDMP had been weakened.

Table 24
NON-GORGE PUBLIC COMMENTS¹ BY SCENIC
RESOURCES MANAGEMENT STRATEGY: FDMP STAGE

	General SR Protection		Open Space		Landscape Settings	KVAs	
Generic Statements²	46;	25+ 21–	N/A		N/A	N/A	
Mention of SR Concepts	4;	1+ 3–	31;	1+ 30–	0	33;	1+ 32–
Mention of Specific Places	0		3;	2+ 1–	0	1;	1+ 0–
Mention of Specific Standards	5;	0+ 5–	1;	0+ 1–	0	2;	0+ 2–
Totals (126)	55		35		0	36	

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

Interest Groups

Table 25 shows the breakdown of the 20 comments made by the interest group public by scenic resource management strategy. Far fewer comments were made on the scenic resources policies in the FDMP. Like both the gorge and non-gorge publics, interest groups were critical of the reductions in open space and of allowing quarries to operate within three miles of KVAs. Interest groups had little else to say about scenic resources protection at this stage.

Table 25
INTEREST GROUP COMMENTS¹ BY SCENIC
RESOURCES MANAGEMENT STRATEGY: FDMP STAGE

	General SR Protection		Open Space		Landscape Settings	KVAs	
Generic Statements²	2;	2+ 0–	N/A		N/A	N/A	
Mention of SR Concepts	1;	0+ 1–	5;	0+ 5–	0	5;	0+ 5–
Mention of Specific Places	1;	1+ 0–	1;	1 0–	0	2;	2+ 0–
Mention of Specific Standards	2;	1+ 1–	0		0	1;	0+ 1–
Totals (20)	6		6		0	8	

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

NSA Counties

Table 26 shows the breakdown of the 13 comments made either by the NSA county commissions or their planning departments. Like the other publics at this stage, comments were primarily negative.

The NSA counties continued to worry about implementation issues. The application of scenic resource protection ordinances through open space designations continued to be an issue, and it was requested that open space designations sunset after five years. The NSA counties also requested that the guidelines for SMA and GMA landscape settings be combined, to simplify ordinance development and administration.

Table 26
NSA COUNTIES COMMENTS¹ BY SCENIC
RESOURCES MANAGEMENT STRATEGY: FDMP STAGE

	General SR Protection	Open Space	Landscape Settings	KVAs
Generic Statements²	1; 0+ 1–	N/A	N/A	N/A
Mention of SR Concepts	1; 1+ 0–	6; 2+ 4–	0	0
Mention of Specific Places	0	0	0	0
Mention of Specific Standards	0	0	5; 0+ 5–	0
Totals (13)	2	6	5	0

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

There were no comments about KVAs and the provision allowing the continued operation of quarries within three miles of a KVA. The requests of NSA counties for the use of mitigating measures to allow land uses and activities to occur if consistent with their landscape settings had been met, at least with regard to the economically vital minerals production industry. This would also help the counties avoid potential takings issues related to quarry lands.

Other Agencies

Table 27 shows the breakdown of the eight comments made by other governmental agencies. Comments were similar to those made on the preliminary drafts. There was continued support from ODOT for open space from Hood River to Mosier; the Bureau of Indian Affairs requested

open space designations as proposed in the preliminary drafts. DOGAMI¹⁸⁴ was still critical of the lack of flexibility in screening requirements for quarries visible from KVAs.

Table 27
OTHER AGENCIES' COMMENTS¹ BY SCENIC
RESOURCES MANAGEMENT STRATEGY: FDMP STAGE

	General SR Protection	Open Space	Landscape Settings	KVAs
Generic Statements²	0	N/A	N/A	N/A
Mention of SR Concepts	2; 2+ 0-	1; 0+ 1-	0	1; 0+ 1-
Mention of Specific Places	0	1; 1+ 0-	0	0
Mention of Specific Standards	0	0	3; 3+ 0-	0
Totals (8)	2	2	3	1

1. Includes both SMA and GMA comments.

2. Comments in this category favor or oppose scenic protection, and do not mention any concepts, places, or standards.

Additional issues for consideration were mentioned by two agencies. The Oregon State Marine Board asked that scenery from the perspective of the boater be considered in addressing both scenic and recreational resources. The Oregon Department of Energy asked that provisions be made for inclusion of wind energy facilities, and suggested specific standards that would allow wind energy facilities to blend with their landscapes. However, the determination had previously been made by CRGC staff that wind energy facilities were industrial in nature and were

thus prohibited outside of urban areas in the NSA under the Act. This¹⁸⁵ has been an ongoing issue in the NSA, as interest remains in at least small-scale wind-farming (Newell, 1996). It is important in that gorge utilities are in need of additional energy resources.

THE MIX OF GENERIC AND SPECIFIC STATEMENTS

As another means of distinguishing interests and understanding among interest groups, responses from those who made generic statements were examined to see if they also contained specific references to scenic resource protection strategies. This information is summarized in Table 28.

Table 28 shows that the gorge and non-gorge publics provided the generic comments. This is consistent with the theory that the public-at-large has a more emotional pull toward the gorge and this was manifest in value statements that contain little of substance.

There are certainly differences between the early and later drafts of the management plans. For the earlier drafts, the gorge and non-gorge publics tended not to include specific statements. But at the FDMP stage, more often than not, emotional appeals were accompanied by specific comments. This is likely due to longer exposure to and hence a better understanding of the purposes for the protection strategies, whether they were supported or not. Policy makers could certainly benefit from a documentation of changes in attitudes, opinions, and values through a longitudinal analysis of people's beliefs about the gorge. This would be very helpful in developing future public participation efforts policy-makers fine-tune the management plan in the years ahead.

Table 28
RESPONSES WITH BOTH GENERIC AND SPECIFIC COMMENTS:
PDMPGMA/DMP SMA AND FDMP STAGES

Group	PDMPGMA/DMP SMA		FDMP	
	Generic Only	Both	Generic Only	Both
Gorge Public	32	8	6	13
Non-Gorge Public	20	8	15	21
Interest Groups	4	7	1	1
NSA Counties	1	4	1	0
Other Agencies	0	0	0	0

CONCLUSIONS

A true statistical comparison of response rates among the various publics is not possible, because the population was self-selecting. However, some valid inferences can be drawn from the types and tone of comments made by the various publics. It was expected that there would be differences in the types of comments made by stakeholders in the development of the management plan. However, given the fact that less than one in five commenting on the plan specifically addressed scenic resources, the question of interest was the perspectives and attitudes of stakeholders with regard to scenic resources. There were identifiable differences between identified "publics," both at the draft plans stages and the FDMP stage.

The PDMPGMA and DMPSMA Stages

The gorge public provided the most comments about the proposed scenic resources management strategies contained in the PDMPGMA and the DMPSMA, and their comments focused principally on GMA lands. This is not surprising, because GMAs comprise the bulk of private property in the gorge, and gorge residents were not happy about proposed restrictions. However, gorge residents did show support for scenic resources protection. The non-gorge public provided comments in similar categories to the gorge public, but comments were overwhelmingly in favor of generally protecting the gorge, and of using open space as a scenic resource protection strategy.

The concept of KVAs was supported only by the non-gorge public, again showing that people will most often support protection measures when they do not directly bear any costs of doing so (Francis, 1990).

Interest groups provided a smaller proportion of general protection comments but a much greater proportion of comments on scenic resource concepts, primarily on open space designations, than either the gorge or non-gorge publics. In contrast to the non-gorge public, interest group comments on KVAs were mostly negative. Both interest group supporters and critics of gorge policies were critical of KVAs, the former believing them to be too ambiguous and the latter believing them to be too encompassing. Interest groups also provided a larger share of comments on specific standards than either the gorge or non-gorge publics. This was expected, since the coalitions that formed around single resources were already very familiar with management issues

surrounding them, and were therefore able to comment specifically on¹⁸⁸ the effects of proposed protection measures.

In contrast to the other groups, most of the comments from the NSA counties focused on specific scenic resource protection standards. Positive and negative comments were about evenly split for general protection and landscape settings standards, but were almost entirely critical of KVAs. NSA counties had no positive comments (of 18 provided) regarding the open space designations. These comments reflect the frustration of local officials who are required to implement intergovernmental relations schemes.

Like the NSA counties, other agencies mostly focused on specific standards. Comments were mostly critical of general protection proposals and KVAs, and about evenly split for landscape settings. Unlike the NSA counties, however, there was some support for open space policies. Other agencies' comments can be categorized as a cross between those of the NSA counties and those of the interest groups, in that these other agencies were concerned about implementation issues, but as they would specifically affect their missions.

The differences in comments at this point revolve around support for protecting the scenic beauty of the gorge, but that support was much higher from outside the NSA. The public record supports Stone's (1988) contention that those most adversely affected by proposed changes in resource policy will be the most vocal. In general, the public-at-large provided generic comments, while those with specifically stated interests defended them, and most often by talking about policy specifics. Generic concerns were consistent with the protection mandate in the Act, and

the CRGC was left addressing the local politically hot issues of open space and KVAs. The significance of comments at this point was alluded to in Chapter VI—that scenic resources are hard to understand and define, which results in a similar situation with regard to governance mechanisms to manage them.

The FDMP Stage

At this point, the plan had been four years in the making, and the Commission's deliberations and final adoption vote were looming. Scenic resource protection issues narrowed considerably, focusing on adding back as open space the 5900+ acres deleted from the preliminary drafts, and not allowing new or continuing quarry operations within three miles of a KVA. As was evident throughout the development of the management plan, open space continued to be an issue of concern, both to those who were fearful of added restrictions to their property and to those who believed open space as defined in the Act would be an effective way to protect scenic beauty in the gorge.

At the FDMP stage it was the non-gorge public, not the gorge public, that had the most to say about scenic resources. Changes made to the scenic resources policies of the FDMP that appeared to weaken it considerably were viewed with much greater alarm by the non-gorge public, but brought fewer comments from the gorge public. This phenomenon is explainable by what Abbott et al. (in press) and others have referred to as “the proprietorship of the gorge” by residents of the Portland metropolitan area, because the impetus for NSA creation came from outside the gorge. This is the flip side of Francis' (1990) notion about benefits going to those who do not live adjacent to the resources in

question; that is, the non-gorge public understood the scenic resources¹⁹⁰ protection language of the preliminary drafts, but realized much of it had been weakened at the FDMP stage, eliminating much of the protection benefit it had hoped to enjoy. Similarly, the gorge public, in many respects outraged by the restrictiveness of the preliminary drafts' language, believed at least some of their concerns about scenic resources policies had been heard. This latter group viewed the Commission's efforts on the FDMP as attempting to strike more of a balance between the Act's two goals, or at least making it less restrictive in some policy areas. The FDMP at least contained a section on an action plan for the gorge economy, but, as an ironic twist, states that the plan by itself can't accomplish the second purpose of the Act!

Landscape settings and the concept of visual subordination were virtually unnoticed at this point, even though these were proposed as the units of and standards for management of new land uses and activities. As previously stated, the concept of landscape settings was based on definable physical features in the landscape. From a planning standpoint, these were easily recognized and understandable by the public because they were definable. That the entire protection strategy of visual subordination did not raise more questions is indeed a mystery. There were a few comments from NSA counties about design standards and from the gorge public about who was qualified to judge visual subordination, especially for areas with little development and perhaps little vegetation. But the particulars of landscape setting requirements relating to colors of building materials, height limitations, and landscaping and screening drew very little response. These, however, are

standard planning and zoning requirements, and at least one county (Hood River) had been reviewing permit applications with scenic impact criteria since 1980 (Nagler, 1996). On the other hand, a Klickitat county commissioner lamented that if his county had been paying attention to visual impacts, the creation of the NSA might have been avoided.

As the policy development process unfolded, CRGC staff touted KVAs as the focus of protection in the gorge, which also may explain the lack of specific comments on landscape settings. KVAs represented the large-scale approach in scenic resource protection, and all groups excepting the non-gorge public were critical of them. The fear was that the extent of KVAs would result in strict regulation of the entire NSA. KVAs were a new and unproven planning tool and opposition is easily explainable by their big-picture focus coupled with the lack of a definition for the very resources they were supposed to protect.

The criticism of KVAs also relates to concerns about the restrictiveness of GMA policies in relation to SMA policies. As stated previously, there was a general expectation from the language in the Act that GMA policy was to be less restrictive than SMA policy. Many comments from KCC and CRGC meetings about this lack of differentiation were aimed at KVAs and how they would be used as a management tool.

Interest was clearly down at the time the FDMP was published. The number of comments received on scenic resource protection strategies was lower for all groups except the non-gorge public. There are a couple of reasons for this. The public record contained comments from many who were involved in the development of the management plan who were

tired of or frustrated with the process after four years. Many of these were former KCCs who had invested considerable time, only to see the primary management direction be almost entirely protection-oriented. The reality of the fact that the public agenda for the gorge had been defined not by local residents but by outsiders had begun to set in. There was also the unspoken realization that the NSA counties would develop the actual implementation ordinances for the management plan, giving those dissatisfied another chance to argue their particular circumstances before the county commissioners.

The differences in concerns among various stakeholders at the FDMP stage both narrowed and widened, because of the relaxation of some of the earlier scenic resources protection provisions. The number of topics commented on narrowed to a few key issues. But, there was greater polarization around perceptions of both restrictiveness of policies and about the effectiveness of policies. There was almost universal criticism around these two issues, and few commenters were pleased with the scenic resource provisions of the final plan. The CRGC stayed with the visual subordination requirement for all new land uses and developments, while reducing the amount of open space land and relaxing restrictions on quarry operations. At this point, the CRGC was poised to leave its mark on the gorge by weighing in heavily on the side of protection of gorge resources and resource lands.

Chapter VIII

CONCLUSIONS

The prospect of attempting to preserve or conserve the landscape is a fascinating one. As a society we have made a distinction between the spectacular and the ordinary, and separated out the spectacular into “museum pieces” for preservation in one form of reserve area type—the national park. But what of more ordinary landscapes?, as Leopold, Whyte and others have asked. What role, if any, do we assign to landscapes that are not as spectacular as the Grand Canyon or Yosemite, or have qualities and dimensions appealing to humankind but are partially or heavily developed already?

In our technocentric societal view of nature, the landscape is comprised of a number of seemingly unconnected, randomly distributed but economically attractive resource components. There are trees that have economic value to the timber industry. There are waterways that serve as arteries of commerce and as sources of water for a variety of uses. There are open meadows and rangelands which serve as a food source for livestock. There is hidden wealth in energy and non-energy minerals to be found beneath the landscape. The management schemes that have been developed and implemented have focused on these

separate and specific resources, and it is this view of the potential economic value to be gained from the landscape that has stood in the way of our understanding and appreciating the amenity values it offers.

Management of Scenic Resources

Federal lands reserves have been designated with a scenic orientation, but a closer look at their management reveals that a scenic area is not necessarily managed expressly to protect scenic resources. Based on a review of management plans, there still isn't a clear policy orientation toward protection of landscapes, even for those with the word "scenic" in their titles. Scenic resources either receive minimal attention or, if defined at all, are managed in the context of other environmental values such as air quality, water quality, open space, and recreation.

A better articulation of the public interest in scenic resources management by whatever means will be necessary to establish scenic beauty in the landscape as a public issue needing attention. This relates to Anderson's discussion of public sector involvement and how it is determined which strong national interests justify federal programs. His questions are directed primarily at aid and entitlement programs, but the question of where scenic resources fall in the hierarchy of national interests is one that so far has remained unanswered. Perhaps the title of "scenic area" appeals to our expectations of a pleasant-looking landscape, and in fact may be a deliberately neutral choice so as not to emphasize any particular resources or resource management strategy.

The Columbia River Gorge NSA could have followed this same model, but the fact that it was created with the mandate that protection of scenic and other resources has higher priority than most development

activities signifies that scenic resources have a place on the national agenda. This represents a step toward a new way of thinking about less-than-pristine landscapes with high quality scenic attributes, in spite of the fact that consideration of amenity resources such as scenery does not appear to be a high priority resource management concern.

In the NSA, no land use decision will be made without expressly focusing on its impacts on the scenery in the gorge, and such decisions will be made by "experts" based on objective rules and regulations developed to protect subjectively defined resources. The question is no longer whether or not it is worth doing in the Columbia River Gorge, although many in the gorge are still asking why. The question is how to do it in an area that already was home to substantial development (just as in places like the Tahoe Basin) with an audience who is skeptical at best.

Important in this scenario is that NSA regulations do not affect those living in the urban areas. In fact, urban areas may continue to develop as they choose. The efficacy of planning at the local level then becomes the issue. Gorge planners included the viewpoints of the states of Oregon and Washington, each of whom have different planning requirements. Provisions of Oregon's 1973 statewide land use planning goals serve as the basis for activities at the local level, and Goal 5 includes inventorying and planning for scenic resources. In fact, those portions of Oregon counties in the NSA were exempted from the statewide planning goals because it was believed management plan policies would be more restrictive. Washington's growth management legislation was enacted in 1990, and only applies to counties of greater

than 50,000 population. Clark County is the only one of the three Washington NSA counties with planning requirements. In the absence of a uniform set of rules for both sides of the gorge, changes would be made based on local attitudes about planning and zoning, and these are decidedly different between the two states involved.

Perhaps the most troubling aspect is an adequate definition of what constitutes a scenic resource. Given our patterns of development, many of the landscapes with scenic resources are already dotted with development, which puts the issue of what is deserving of protection back to developing an adequate definition of what is considered scenic. This definition varies from landscape to landscape, relating to the degree of ruralness, the sense of community, a sense of place, how acceptable development is in the landscape, and how well it blends in with the landscape. It will not be possible to completely preserve or protect landscapes for aesthetic purposes, nor may it even be necessary or efficacious to do so, but it is possible to control activities and land uses. Given the lack of an adequate definition, this is one issue where an education process and an exchange of meaningful information is critical.

The Role of Public Comment

How do the effects of the technocentric paradigm as outlined by O'Riordan (1976)—that amenities in the environment do not receive much attention because of the orientation toward commodity production, and resistance to public opinion by professional policy elites—relate to the decision-making process? Kann (1986) states that in the absence of countermanding orders, scientific managers will be unresponsive to

public needs and demands for environmental protection, as they remain¹⁹⁷ more aligned with corporate elites.

The Act, however, provided just such a countermanding order, and left scientific managers with the problem not only of identifying resources not typically given much attention, but of developing a system that could be defended to, and understood and accessed by the public. The challenge was how to do this with a limited understanding by the public of the resources at hand—in this case, scenery.

The issue in essence is the role of environmental democracy.

Environmental democracy as described by Kann (1986) means that interactions between nature and society should be primarily influenced by people who are able to define and achieve the public interest.

Theoretically, this definition should have come from the CRGC. Early on, however, the CRGC was heavily weighted by the politics of the appointments process toward gorge preservation, and it can easily be argued that by relying on a strict reading of the Act's protection and enhancement mandates, the local public interest, which in large part was anti-protectionist, was subverted. What is missing from the definition of environmental democracy that relates to the present context is reference to the political or even the geographic extent of the public interest.

Against this backdrop, gorge planners used a vigorous public information and involvement campaign to try to explain to a skeptical and often hostile gorge community what scenic resource protection would mean in the context of the mandates of the NSA Act. The public record indicates that:

- Management direction was adopted as recommended by CRGC staff¹⁹⁸ and was fairly well established prior to the public involvement process;
- Scenic resources were not prevalent in the minds of those who commented during the development of the management plan. More interest was paid to recreational resources in the NSA than to the other resources requiring protection and enhancement by the Act;
- People were more concerned about the perceived restrictiveness of policies and the lack of attention to property rights and economic development; and
- Goals and policies were generated almost exclusively by gorge planners based on the application of “objective” criteria that identified what was most scenic about the gorge.

Complicating the problem is that scenic resources are hard to define, and in fact they are not defined at all in the management plan. This fact, coupled with people’s unformulated thinking about scenic resources in the gorge explains why so few comments were received on scenic resources.

The primary concern was over regulation of land and natural resource uses, through the perceived restrictiveness of zoning schemes devised to protect resources that are not traditionally accounted for. This anti-regulation sentiment along with the complexity of the proposed management regime, with sections on landscape settings, open space, and KVAs (that address just one gorge resource) resulted in a large number of generic statements, as opposed to comments on specific management techniques and regulations. Commenters wanted specific recreational or natural resources protected, but only addressed scenic resources in general language. This is further evidence that scenic resources, because of their subjectivity and the difficulties and

complexities of dealing with them, appear to be addressed through the¹⁹⁹ management of other resource values.

Then there are the scenic resources themselves. While there were explicit concerns about economic development, property rights, and who gains and loses from NSA regulation, scenic resources were discussed implicitly and in generic fashion. Even gorge planners, the scenic resource experts, used subjective terms like visual subordination and landscape compatibility in describing their vision for the gorge landscape. Unless and until there is a better articulation of what comprises scenic resources, and these can be correlated with the biological, cultural, and personal modes of aesthetic experience as outlined by Bourassa (1990), then scenic resources management is likely to remain outside the realm of scientific management, and be more myth than reality.

The CRGC proceeded with a public involvement process that in the end was mainly an education and public relations campaign—and ultimately a way to have the local public interest be heard. The CRGC exhibited greater sensitivity and balance as the policy development process proceeded, but, as stated earlier, the direction for the management plan was set before decisions about the scenic resources management framework and related policies were ever subjected to local public scrutiny.

Why there isn't greater attention to landscape aesthetics is a fair question. Where do scenic resources fit in Maslow's hierarchy of needs? An unemployed timber worker is not likely to spend much time considering the amenity values of forests, when such contemplation does

not put money in the bank nor food on the table. There are no college²⁰⁰ courses of study for scenic resources, as there are for recreation resources, fisheries and wildlife resources, agriculture, forestry, and mining; the closest one would get is through a landscape architecture program, where the emphasis is generally on naturalistic landscapes. There are few if any interest groups specifically formulated around the objective of protecting scenic resources.

Another clue about the future of amenities such as scenic resources can be found in a review of recent public land and natural resource management literature. Much of the recent literature on environmental policy virtually ignores even the recreational value of the landscape in discussions of natural resource and environmental issues, let alone the value (or lack thereof) of the landscape from an aesthetic point of view. In discussing public environmental policies, Portney (1990) does not mention visual resources or wilderness, and discusses recreation only in the context of how it is affected by water quality. Rosenbaum (1985) does not mention visual resources, but does state that most of the unspoiled areas left in this country are found in wilderness areas, as he laments over Leopold's unheeded call for a land ethic. In their discussion of environmental policy for the 1990s, Paehlke (1994) and Vig and Kraft (1994) make no mention of recreation or visual resources, but do discuss competing environmental values and the need for an environmental ethic, and conclude that more "governance" will be necessary. Gore (1992) calls for a paradigm shift in our thinking about the environment, but primarily focuses on our resource consumption habits, making no mention of visual resources, wilderness, or recreation.

Clawson (1975) mentions non-monetary forest values of recreation,²⁰¹ wildlife, wilderness, and aesthetic values in the context of the troublesome controversy over how to put a value on them, and states in a later work that if society truly valued these non-market outputs, they would pay directly for them and not be so inclined to discuss them in terms of their pricelessness (Clawson, 1983). The conclusion is that these issues are still treated as add-ons to commodity-based management regimes.

However, concerns for amenity values such as landscape aesthetics are being discussed in a growing literature dealing with spiritual, moral, religious and ethical concerns. Hargrove (1989) examines how our attitudes toward nature have developed, from the European tradition of formal gardens, to the challenges presented by wilderness to early settlers, to the role of the arts and sciences, and finally to utilitarian arguments about the role of nature and resources. As an example, he spends considerable time responding to Passmore's contention (1974) that preservationist-oriented environmentalists "are anti-scientific nature mystics who have abandoned the 'analytical, critical approach'" in favor of irrational positions espoused by "strange Oriental religions". This relates to the "relevance" axis on Porteous's (1982) model, which looks at actions based more on emotionalism and values than on sound science. Wenz (1988) looks at the problems of a "one-size-fits-all" approach to environmental regulation by examining problems with application of the scientific method, the use (or misuse) of cost-benefit analyses, and the limits to utilitarianism because of the affects on the poor. Paehlke (1994) discusses ecology, environmental health, and sustainability as core

values, and the role ethics play in the link between environmental and²⁰² social justice. Hessel (1992) and Bradley (1990) take a theological approach to mending our relationship with nature, stressing the bounty and beauty of "The Creation" and the need for better stewardship.

Legal issues are also critical to the future of scenic resources. Aesthetic jurisprudence has evolved from aesthetics as subjective and arbitrary through a period where aesthetics was allowed as a secondary purpose of regulation to aesthetics as a primary basis for government action (Mandelker and Cunningham, 1990; Karp, 1990; Bourassa, 1992). Smardon et al. (1986) characterize major legal trends concerning aesthetic values as a shift in emphasis from private action affecting private property (nuisance) to local public action regulating private property (zoning and design review), to public action taking private property (eminent domain), to public action regulating public agency actions and public property (federal and state legislation). The NSA is an example of the latter; however, the idea of aesthetics as a foundation for police-power regulation is deemed to be fraught with uncertainties (Pearlman, 1988; Bourassa, 1992).

It has been shown that scenic resources are not a major public policy issue in and of themselves, but that they are important in the context of the quality of human interaction with the landscape. The larger issue is whether or not scenic resources and the aesthetics of landscape should be institutionalized considerations. Costonis (1982) provides a distinctively pessimistic view:

Aesthetics policy, as currently formulated and implemented at the federal, state, and local levels, often partakes more of high farce than of the rule of law. Its purposes are seldom accurately

or candidly portrayed, let alone understood, by its most vehement champions. Its diversion to dubious or flatly deplorable social ends undermines the credit that it may merit when soundly conceived and executed. Its indiscriminate, often quixotic demands have overwhelmed the integrity of the legislative, administrative, and judicial processes in the name of "beauty."

There may be no alternative to using up some of nature's aesthetic resources if the rest of nature's bounty is to maintain the well-being of humankind. But, as Willard (1980) points out:

Unless and until it can be shown that those areas of nature which the minority want preserved for aesthetic purposes are necessary for the satisfaction of other more important interests or needs, the minority are surely justified in claiming their right to preservation.

There are a number of follow-up research questions that would further clarify our thinking about scenic resources. Gathering socio-economic, employment, and affiliation information on those providing comments would be useful as a step toward answering questions relating generally to the value of environmental democracy, and specifically to values and beliefs and how these related to levels of participation in development of the NSA management plan. Perception of scenic resources and the understandability of schemes to manage and protect them in the gorge represent another line of possible follow-up research. A third question relates to seeing if those who believed they would be harmed by the management plan actually were, and how. Yet another question is the extent to which the NSA has affected the interest in scenic resources in other areas. A tangential issue is how change in land status (e.g., national forest to national scenic area, or national forest to wilderness area) affects perceptions of visitors, as well as their desire to visit an area that has been assigned special status. Related to

this are the effects, if any, the NSA has had on lands adjacent to but outside NSA boundaries. And, of course, the most important question, one which will be addressed soon, is whether the policies implemented to protect and enhance scenic resources are in fact doing so.

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APPENDIX

LIST OF INTERVIEWEES

Art Carroll, National Scenic Area Office Manager
Michael Ferris, National Scenic Area Office Public Affairs
Jonathan Doherty, Executive Director, CRGC
Kathy Gilbert, Cultural Resource Specialist, National Park Service
George Meckfessel, Planner, East Mojave National Scenic Area
Linda Greene, Cultural Resource Specialist, National Park Service
Vivica Orsi, Associate Planner, Tahoe Regional Planning Agency
Lauri Aunan, Executive Director, Friends of the Columbia Gorge
John Schuyler, Planner, Mono Basin National Forest Scenic Area
Mike Nagler, Hood River County Planner
Brian Litt, CRGC Planner
Jurgen Hess, National Scenic Area Office Planner
Sally Newell, CRGC Commissioner
Ken Maddox, Columbia River Boardsailors Association
Dick Benner, Director, Oregon Department of Land Conservation and Development
Nancy Russell, Friends of the Columbia Gorge
Gary Kahn, Reeves, Kahn and Eder (law firm)