



TO: Columbia River Gorge Commission
FROM: Friends of the Columbia Gorge
RE: Friends' Comments on the Draft Climate Chapter
DATE: June 30, 2020

Thank you for the opportunity to comment on the new draft Climate Change chapter of the Management Plan. Friends of the Columbia Gorge (Friends) is a nonprofit conservation organization with approximately 6,500 members dedicated to the protection and enhancement of the scenic, natural, cultural and recreation resources of the Columbia River Gorge area. Friends supports livable, well-planned communities within the National Scenic Area.

Friends acknowledges the work of the staff to develop a new Climate Change chapter. However, for the past three years the Commission staff assured Gorge Commissioners and the public that the entire Management Plan review would be conducted through the lens of climate change. Now, more than three years after the initiation of plan review, we are not aware of any part of the Management Plan that has been reviewed through the lens of climate change, nor have we seen any documents or proposed revisions that included substantive policies or guidelines to address climate adaption or mitigation.

GMA Policies

1. GMA Policy 1. Page 380.

Comment 1: The proposed Climate Action Plan has no timeline or deadline included. As written, development and implementation could be delayed for many years. Require a one-year deadline for completion of the Climate Action Plan.

Comment 2: Policy 1 is silent on review and approval of the Climate Action Plan. The plan must be reviewed by the Gorge Commission for consistency with the Management Plan and approved by a vote of the Commission.

Friends Recommendation (Proposed revisions in blue bold):

Within one year of the adoption of this Policy, the Gorge Commission shall develop and adopt a Climate Change Action Plan that is based upon a local climate vulnerability assessment that integrates risk information with regional land use data. The Climate Change Action Plan shall include specific strategies and actions for climate adaptation and

mitigation. The Climate Change Action Plan shall include consultation with the four Columbia River treaty fishing tribes and the Forest Service, and shall involve the public. **The Climate Action Plan shall be reviewed by the Gorge Commission and Forest Service, and approved if determined to be consistent with the National Scenic Area Act and the Management Plan.** The Climate Change Action Plan shall be regularly reviewed and updated as needed, based upon new data and information.

2. Policy 1. Page 380. Stream and riparian areas.

Comment: The Climate Action Plan needs to require a 200 foot buffer for all fish-bearing streams in the National Scenic Area. Stream buffers in the General Management Area were adopted more than 30 years ago and are inadequate for providing protection of critical habitat for endangered salmon. Salmon habitat protection in the Special Management Areas and on federal forest lands is far more protective and is based on the best available science. Management recommendations for stream protection developed by the Washington Department of Fish and Wildlife that apply elsewhere in Washington are far more protective than the minimal stream buffers that apply in large areas of the National Scenic Area.

<https://wdfw.wa.gov/publications/00029>

The USEPA has developed a draft Cold Water Refuge Plan for the Lower Columbia River that includes several tributaries within the National Scenic Area. Cold Water Refuge (CWR) is essential to the survival salmonids, particularly when temperatures reach 20 degrees in the Columbia River, Species most reliant on CWR include ESA federally-listed summer steelhead and fall Chinook, because the timing of their upstream migration coinciding with peak temperatures on the main stem of the Columbia River.

<https://www.epa.gov/columbiariver/draft-columbia-river-cold-water-refuges-plan>

In 2009, the Gorge Commission determined that the habitat quality of 13 watersheds in the National Scenic Area was either moderate or impaired. None of the watersheds had an overall rating of good for stream habitat quality. Eight of the 13 watersheds were rated as having impaired stream habitat quality. The analysis does not include many important tributaries within the National Scenic Area that provide habitat for ESA listed salmonids, such as Gibbons Creek, Lawton Creek, Duncan Creek, Greenleaf Creek and others.

http://gorgevitalsigns.org/Reports/VSI_SOG_Natural2009.pdf

Friends Recommendation (Proposed revisions in blue bold):

Policy 1. Page 381. Streams and riparian areas – protecting and enhancing aquatic and riparian systems. This includes expanding stream buffers, requiring vegetation enhancement, protecting cold water refuge habitats, and other approaches. If the Gorge Commission has not completed its evaluation of appropriate stream buffer protections

by one year after adoption of revisions to the Management Plan, the Gorge Commission will implement the following interim stream buffer protection standard: apply the existing SMA buffer width (200 feet) to ~~cold-water-refuge~~ **fish-bearing** streams within the GMA. ~~Streams affected by this policy change include the Sandy River, Wind River, Little White Salmon River, White Salmon River, Hood River, Klickitat River, Fifteenmile Creek, and Deschutes River.~~

- 3. Policy 1. Page 381. Forest resources** – protecting forested lands for carbon storage. This includes siting and development standards, forest practices policies, land conversion policies, and other approaches. The Gorge Commission shall prohibit conversion of forest lands to any use other than agriculture, recreation, and open space. For conversion to agriculture or recreation, the Management Plan should require full mitigation.

Comment: This policy should explicitly prohibit conversion of forest land to residential uses.

Friends Recommendation (Proposed revisions in blue bold):

Forest resources – protecting forested lands for carbon storage. This includes siting and development standards, forest practices policies, land conversion policies, and other approaches. The Gorge Commission shall prohibit conversion of forest lands to **residential use or** any use other than agriculture, recreation, and open space. For conversion to agriculture or recreation, the Management Plan should require full mitigation.

- 4. Policy 1. Page 381. Wildfire** – protecting scenic, natural, cultural, and recreation resources from wildfire and reducing the risk of human-caused ignitions from new development and other causes. This includes siting and development standards, building design and materials standards, and other approaches.

Comment: With the increased frequency and intensity of fire due to climate change, new dwellings in forest land should be prohibited. Dwellings in forest land increase the risks of human caused fires, endanger public health, safety, emergency responders and property. The Climate Action Plan should examine prohibiting new dwellings in Large Woodland zones and Small Woodland zones on parcels eligible for, or enrolled in the forest tax assessment program.

Friends Recommendation (Proposed revisions in blue bold):

Wildfire – protecting scenic, natural, cultural, and recreation resources from wildfire and reducing the risk of human-caused ignitions from new development and other causes. This includes **prohibiting new residential development in forest land**, siting and development standards, building design and materials standards, and other approaches.

- 5. Policy 1. Page 381.**

Comment: The list of issues needs to include ecosystem change, habitat risks, changes to hydrology and the risks of floods. Link these issues to specific policies in the Management Plan.

Friends Recommendation (Proposed revisions in blue bold):

Assess risks and likely changes to ecosystems, Priority Habitats, wildlife, ground water and surface water in the Climate Action Plan. Develop policies to adapt to these risks and avoid adverse effects where possible.