

Mr. Robert Liberty, Chairman
Columbia River Gorge Commission
57 NE Wauna Avenue
White Salmon, WA 98672

June 30, 2020

Dear Chairman Liberty and Gorge Commissioners,

The Columbia River Gorge is a national treasure for all people, and a unique and vital ecosystem that deserves the strongest and most vigilant protections possible. The entire Pacific Northwest has a vested interest in preserving the National Scenic Area for the health of our communities and environment. We support both purposes of the National Scenic Area Act which, as you know, are:

1. To protect and enhance the scenic, natural, cultural and recreation resources of the Gorge and
2. To support the economy of the gorge by encouraging growth to occur in existing urban areas and encourage economic development to take place in a manner that is consistent with the first purpose.

We submit these comments in support of those purposes, and to ensure that the beauty and environment of the Columbia River Gorge is preserved for future generations through a strengthened Gorge Management Plan. Thank you and your staff for the years of dedicated work it has taken to update the plan. Rather than submit separate comment letters from each organization on each chapter of the Plan we have combined our comments as follows:

Natural Resources - Part I, Chapter 3:

Wetlands, Page 106: Prohibit any loss of wetlands by applying a “no loss” standard to wetlands protections. This standard has been applied for nearly 30 years in the Special Management Areas (SMA) and needs to be applied to the General Management Areas (GMA).

Wetland, Pond and Lake Buffers, Page 116: Western pond turtles are listed as “endangered” in Washington and “sensitive/critical” in Oregon. Western Pond Turtles spend considerable time in terrestrial habitat and usually lay eggs 100 meters (330 feet) or more away from streams, ponds and lakes. The Management Plan only provides a 100-foot buffer for perennial streams and a 75-foot protective buffer for wetlands, ponds, and lakes in forest habitat. Improve wetland, pond, and lake buffers to protect endangered Western Pond Turtle nesting and rearing habitat by increasing buffers around suitable habitat for the only native turtle species in the Gorge. Increase protective buffers to a minimum of 100 meters. Guideline 2.A., Page 116.

Stream Buffers, Page 117: To protect habitat for threatened and endangered trout and salmon populations within the National Scenic Area and to adapt to increased stream temperatures and changes to seasonal flows resulting from climate change, increase protective stream buffers to a minimum of 200 feet in Guideline 2.B., Page 117.

Priority Habitat and Sensitive Wildlife Protection, Page 124: To better protect at risk species in the Gorge, such as the American Pika, prohibit adverse effects to all Priority Habitats. For example, prohibit mining, logging, and development within all suitable habitat for the Pika, especially talus slopes.

Climate Change:

Thank you for taking the first step toward addressing climate change by creating a “Climate Change” chapter in the Management Plan and proposing the future development of a climate action plan. However, climate adaptation and mitigation policies are necessary now to fulfill the purposes of the National Scenic Area Act and protect fish, wildlife, sensitive plants, and human health in the Gorge.

Please make the following changes to the draft Climate Change Chapter:

Policy 1, Page 380: Add a target for completion of the Climate Change Action Plan within one year of the adoption of the revised Management Plan.

Streams and Riparian Areas, Page 380: Require a 200-foot protective buffer on each side of all fish-bearing streams in the National Scenic Area, particularly all streams providing habitat for salmon, pending completion of the Climate Change Action Plan. Link this requirement to the Natural Resources Chapter of the Management Plan, Guideline 2.B., Page 117. This standard has been applied for nearly 30 years in the Special Management Areas (SMAs) and needs to be applied to streams within the General Management Area (GMA) of the Gorge. Upon completion of the Climate Change Action Plan, review the 200-foot buffer requirement based on the best available science and improve the buffer protections if necessary.

Other Water Resources and Wildlife Habitat, Page 381: In addition to stream buffers, add a priority to expand protections for the Columbia River, wetlands, ponds, lakes, and wildlife habitat. Prohibit the loss or destruction of wetlands. Improve pond and lake buffers to protect endangered Western Pond Turtle nesting and rearing habitat. Improved policies to protect unique low elevation habitat for the American Pika from disturbances caused by mining, logging, and development. Link these policies to the Natural Resource Chapter of the Management Plan.

Forest Resources, Page 381: To better provide for the mitigation of climate change through carbon sequestration, prevent the conversion of forest lands to residential and agricultural uses. If agricultural conversions are allowed, require full mitigation for the loss of forest land. Change “should” to “shall” regarding full mitigation for the loss of forest land. Revise Part II, Chapter 2 of the Management Plan to incorporate these changes.

Wildfire and Limiting New Dwellings in Forest Land, Page 381: Climate change is causing increased frequency and severity of forest fires. To protect forest land, reduce the risk of human-caused fires, protect public safety and property, and reduce risks to emergency responders, prioritize policies that limit new dwellings on forest lands. Develop policies to prohibit new forest dwellings on productive forest land. Limit new dwellings to Small Woodland zones on parcels that are not eligible for state forest tax assessment programs. Develop new siting and development standards to reduce the risks of fire. Revise Part II, Chapter 2 of the Management Plan to incorporate these measures.

Wildfire and Recreation, Page 381: Add a section to require coordinated temporary closure of recreation sites and trails when there is an extreme risk of fire, such as the conditions that existed when the Eagle Creek fire was ignited in 2017.

Fossil Fuel Infrastructure, Page 381: Add a new policy to prioritize limits on the development and transportation of fossil fuels. For example, develop policies to prohibit new or the expansion of existing fossil fuel infrastructure development, such as pipelines to transport oil or fracked gas.

Urban Areas - Page 414:

The National Scenic Area Act only allows minor revisions to the existing urban area boundaries in the 13 towns within the Columbia River Gorge. There currently is a large surplus of lands set aside for future urban growth. We strongly support new policies to limit urban sprawl by requiring a regional analysis of the development potential in all existing urban areas and defining “minor revision” to be up to 20 acres or 1% of the land area of the urban area, whichever is less. This policy must be cumulative over time.

Thank you for considering these comments and please make them part of the official record.

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