



TO: Columbia River Gorge Commission
FROM: Michael Lang, Friends of the Columbia Gorge
RE: Friends' comments on Draft Natural Resource Revisions and Climate
DATE: April 28, 2020

Thank you for the opportunity to comment on the draft revisions for the Natural Resources chapter of the Management Plan, dated April 23, 2020. 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.

The several staff reports and meeting materials were posted after the close of business on Wednesday, April 22. This provided little more than two business days to submit written comments prior to the 12:00 p.m. deadline on Monday, April 27 for your consideration at the meetings scheduled for April 28, and April 29. As a result, these comments are preliminary. Friends asks the Commission to postpone any decisions based on the topics covered in the staff reports until the public has had an adequate time to review them and provide comments.

General Comments

Thousands of public comments have been submitted to the Columbia River Gorge Commission requesting action, not visions and delays, on climate adaptation and mitigation. The Governors of Oregon and Washington have directed state agencies to prioritize climate adaptation and mitigation.

For the past three years staff of the Commission have repeatedly assured the public that climate adaptation would be a major focus of its review of the Management Plan. The Commission staff has assured the public that everything would be viewed through the lens of climate impacts. At several previous meetings, Commissioners have directed staff to develop climate policies for revision of the Management Plan. Yet as plan review approaches its conclusion, the Commission staff has not developed any policy changes to address the effects of climate change.

Climate adaptation and mitigation policies are necessary to fulfill the purposes of the National Scenic Area Act and improve protection of the outstanding resources of the Gorge. The plan was originally adopted in 1991 and many of its policies are out of date and do not represent the best available science.

For example, 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.

Friends' Preliminary Recommendations

GMA Water Resource Buffers: Friends offers two options. Option number 1 is the preferred option because it has already been implemented on nonfederal land in the Special Management Areas (SMA) since 1992.

1. Apply the SMA water resource buffers in the GMA. This includes requiring 200-foot buffers for perennial fish bearing streams. Allow variances to the buffers if they conflict with another natural resource buffer or would result in no beneficial economic use of a property. Variances could be granted if there are no practicable alternatives to the location and scope of the proposed use or development and the variance is the minimum necessary to allow the new use or development.
2. At a minimum, incorporate the WDFW Management Recommendations for Riparian Habitat into the Management Plan. Prohibit uses and development that are likely to adversely affect riparian and stream systems. Allow variances to the buffers if they conflict with another natural resource buffer or would result in no beneficial economic use of a property. Variances could be granted if there are no practicable alternatives to the location and scope of the proposed use or development and the variance is the minimum necessary to allow the new use or development. Recommended stream buffers are found on page 87.
<https://wdfw.wa.gov/sites/default/files/publications/00029/wdfw00029.pdf>

Prohibit conversions of forest land to agricultural use: Intact forests capture and store immense amounts of carbon from the atmosphere. Prohibit the conversion of forest land to agricultural, residential or urban uses.

Reduce risks of forest fires: Reduce the risks of forest fires and their carbon emissions by further limiting residential development within forest zones, especially small woodland zones where new dwellings are currently allowed outright.