September 4, 2020

Columbia River Gorge Commission
P.O. Box 730
White Salmon, WA 98672

Subject: Final Draft of the Management Plan
via email to krystyna.wolniakowski@gorgecommission.org

Dear Commissioners:

Thank you for this final opportunity to comment, and thank you and Commission staff for the hard work that has gone into this process.

Friends of the White Salmon River (FWSR) is a Klickitat County based non-profit that has worked since 1976 to protect the White Salmon River watershed and support the return on native salmonids.

We are writing to encourage you to address some concerns and support the following changes to the Columbia River Gorge National Scenic Area Management Plan.

Protect Salmon Habitat, Wetlands and Wildlife

The protection of cold-water refuge streams for salmon is critical. Buffers are not the only answer, but they are critical to protection of these streams. Please support the 200-foot buffer requirement on all salmon-bearing streams.

FWSR supports new policies that prohibits the destruction of wetlands by adopting a “no loss” of wetlands policy to apply throughout the National Scenic Area. We ask the Commission to improve all wildlife habitat protections based on the best available science, including expanding protective buffers to 350 feet around ponds and lakes for the endangered Western Pond Turtle.

Adopt a Climate Action Plan

Climate change is here and well underway. If left unchecked, it will have disastrous consequences for all life on earth. We urge the Commission to at a minimum adopt a goal of compiling their Climate Change Action Plan within one year of the adoption of the revised Management Plan. The Gorge Commission should continue to include the prohibition of any loss or destruction of wetlands, include buffers for all waterways and waterbodies, and be flexible enough to address other issues as they arise, which they certainly will.

Protect Agricultural Land, Forest Land
Climate change is increasing the frequency and severity of forest fires. Policies limiting new residential development on forest lands are critical for human safety and environmental protection. FWSR also supports new updates to the farm dwelling standards that will ensure protection of farm land for farm uses and prevent conversions to residential development. Residential development needs to be concentrated in urban growth areas.

**Support Equity Policies**
FWSR believes that diversity, equity, and inclusion (DEI) are completely interconnected to responsible environmental stewardship and leadership. We support the development and adoption of a DEI plan within a year of adoption of the revised Management Plan, with the understanding that steps to increase diversity, do not need to wait for the development of a plan. We understand that this is easier to say than to do, but we absolutely believe that groups currently underrepresented will bring valuable insights and intelligence to ongoing policy making.

**Stop Urban Sprawl**
FWSR also supports limiting urban area expansion into the management areas of the National Scenic Area, period, full stop. Urban sprawl contributes to climate impacts, contributes to the destruction of sensitive and vital wildlife habitat, and promotes unsustainable and reckless urban development planning. We know this has been discussed extensively. However, we continue to prefer no decrease to any Scenic Area management lands. If expansion is to be allowed, as under the current draft, this needs to be carefully and scrupulously managed. There is a large surplus of land available within existing urban areas for future growth, so a regional analysis should always be employed and pursued by the commission to limit urban sprawl and promote the sustainable and responsible economic prosperity of the urban areas. This should be considered and analyzed before any urban area boundary expansion proposal is granted.

**Keep Rural lands Rural**
FWSR asked that the Commission oppose efforts to increase the density of development outside of designated urban areas. Accessory Dwelling Units (ADUs), while sensible and appropriate for increasing density within urban areas, should not be allowed on any lands in the Scenic Area that are outside the urban area boundaries. The Commission should always prioritize the protection of scenic, natural, cultural and recreation resources on lands outside of the urban areas as required by the National Scenic Area Act. Do not promote more residential development on rural lands.

Thank you for your work to protect the Columbia River Gorge. Like many others, we cherish the Gorge, and we appreciate your stewardship.

Very truly yours,

Friends of the White Salmon River

Cc:
Governor Jay Inslee via email to jay.inslee@gov.wa.gov
Jon Snyder, Senior Policy Advisor for Gov. Inslee via email to jon.snyder@gov.wa.gov