



September 3, 2020

Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98672

Subject: Revisions to the Management Plan

Dear Columbia River Gorge Commissioners and Staff:

Please consider the following comments on the final draft revised Management Plan for the Columbia River Gorge National Scenic Area. The Oregon Conservation Network (OCN) is a coalition of over 30 organizations throughout the state that works to pass pro-conservation priorities, protect our unique quality of life, and ensure a better Oregon for our children. OCN is coordinated by the Oregon League of Conservation Voters Education Fund and powered by the tens of thousands of Oregonians who belong to OCN's member organizations

OCN supports the Columbia River Gorge National Scenic Area Act (Act) and its purposes, which are to protect and enhance the scenic, natural, cultural, and recreation resources of the gorge and to encourage economic growth to occur within the existing boundaries of the thirteen urban areas established by the Act. OCN is writing to encourage the Columbia River Gorge Commission (Commission) to update resource protection policies in the Columbia River Gorge National Scenic Area Management Plan based on the best available science and policy recommendations. We also support the adoption of equity policies to ensure a more diverse, equitable and inclusive Commission.

Prevent Urban Sprawl

The thirteen designated urban areas in the Gorge comprise 28,500 acres, more than 10% of the land area of the National Scenic Area. Much of the land within the urban area boundaries is currently vacant or underutilized. OCN supports strong limits on urban area boundary expansion, consistent with the requirements of the Act that allow only minor revisions to the urban area boundaries based upon a demonstrable need and consistency with the purposes and standards of the Act. OCN supports the Commission's current compromise proposal to limit minor revisions to 20 acres or 1% of the land area of the urban area, whichever is less; and limit cumulative revisions to an urban area boundary to 50 acres or 2%, whichever is less. OCN supports the new draft policy requiring a regional analysis of buildable lands within urban areas to determine a demonstrable need for a boundary adjustment, as required by the Act.

Adopt the New Climate Change Chapter and Require a Climate Action Plan

OCN applauds the Commission in beginning to address climate change by including a climate change chapter in the Management Plan and by requiring the future development of a climate action plan. Climate adaptation and mitigation are needed as soon as possible to fulfill the purposes of the National Scenic Area Act and protect fish, wildlife, sensitive plants, and human health in the Gorge. OCN supports a goal of adopting a Climate Change Action Plan within one year after the final adoption of the revised Management Plan.



Support New Policies Protecting Salmon Habitat, Wetlands and Wildlife

OCN supports the new policies to better protect “Cold Water Refuge” (CWR) streams for salmon, improve wildlife habitat protection and prohibit the destruction of wetlands. The U.S. Environmental Protection Agency (EPA), Washington Department of Fish and Wildlife (WDFW), and Washington Department of Ecology have expressed support for 200-foot buffers on priority Cold Water Refuge (CWR) streams within the General Management Area of the Gorge. OCN supports the new policies to apply 200-foot protective buffers on the seven CWR streams identified by the EPA. However, all salmon-bearing waterways in the National Scenic Area should receive this increased protection. Please support the 200-foot buffer requirement on all salmon-bearing streams.

OCN supports new policies that prohibit the destruction of wetlands by adopting a “no loss” of wetlands policy to apply throughout the National Scenic Area. The Commission should improve all wildlife habitat protections based on the best available science.

Protection of Forest Land and Agricultural Land

OCN supports the Commission’s draft policies limiting new residential development on forest lands. Climate change is increasing the frequency and severity of forest fires. Additional limits on new residential development on productive forest lands will help preserve forest land, reduce fire risks, and protect public safety and property in the event of a forest fire. OCN also supports the proposed updates to the standards for new farm dwellings requiring a minimum of \$80,000 in gross annual production on the farm or ranch to be eligible. We also support the new policy indexing this figure to inflation. These policy updates will ensure protection of farm land for farm uses and prevent conversions to residential development.

Keep Rural lands Rural

OCN asked that the Commission oppose efforts to increase the density of development outside of designated urban areas by allowing Accessory Dwelling Units (ADUs) in rural areas. The Commission should encourage ADUs in the existing urban areas and 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. Please do not encourage more residential development on rural lands, especially when there is a large surplus of land already set aside for urban development.

Include Equity Policies in the Revised Plan

OCN believes that diversity, equity, and inclusion (DEI) are connected to responsible environmental stewardship. We support the Commission in adopting DEI policies that require the development of a DEI plan soon after the adoption of the revised Management Plan. The DEI plan should ensure a more diverse staff and commission, apply an equity lens to the Commission’s policy decisions, more actively engage under-represented communities in the region, support affordable housing for urban and rural areas, uphold treaty rights for Indigenous tribes and promote policies that support the rights of Indigenous peoples.



In conclusion, OCN supports the Commission in adopting the draft revised Management Plan with the inclusion of the new policies supported above. Thank you for your work in protecting the Columbia River Gorge National Scenic Area for generations to come.

Sincerely,

A handwritten signature in black ink that reads "Julia B. DeGraw". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Julia B. DeGraw
OCN and OLCV Coalition Director
Oregon Conservation Network

Cc: Governor Kate Brown
Jason Miner, Natural Resource Policy Director
Amira Streeeter, Natural Resource Policy Advisor

Members of The Oregon Conservation Network:

1000 Friends of Oregon | Audubon Society of Portland | Beyond Toxics | Cascadia Wildlands | Center for Biological Diversity | Central Oregon Landwatch | Climate Solutions | Engineers for a Sustainable Future | Defenders of Wildlife | Environment Oregon | Friends of the Columbia Gorge | Friends of Mt. Hood | Greater Hells Canyon Council | League of Women Voters of Oregon | Native Fish Society | Neighbors for Clean Air | Oceana | Oregon Coast Alliance | Oregon Environmental Council | Oregon Physicians for Social Responsibility | Oregon League of Conservation Voters | Oregon Natural Desert Association | Oregon Land and Water Alliance | Oregon Wild | Renewable Northwest | Rogue Riverkeeper | Trout Unlimited | Tualatin Riverkeepers | Rogue Valley Audubon Society | Sierra Club Oregon Chapter | Surfrider Foundation | Umpqua Valley Audubon Society | WaterWatch of Oregon | Wild Salmon Center