



TO: Columbia River Gorge Commission
FROM: Michael Lang, Friends of the Columbia Gorge
RE: Friends Preliminary Comments on Draft Climate Chapter
DATE: May 11, 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 acknowledged 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.

Instead, the draft Climate Change chapter is a hastily prepared document requiring the development of a climate action plan at some undetermined time in the future. It contains no substantive policies or guidelines for climate adaption or mitigation. Friends and thousands of citizens have made specific recommendations to the Gorge Commission on how to incorporate climate adaption into the Management Plan. None of these recommendations have been addressed.

Friends will not repeat these recommendations in this comment letter. We will focus on the draft plan revisions and offer recommendations to make it a more meaningful addition to the Management Plan.

GMA Policies

1. Policy 1. (Page 3 of the pdf.) Climate Action Plan.

Comment 1: The proposed Climate Action Plan has no timeline or deadline included. As written, development and implementation could be delayed for many years.

Recommendation 1: Require a one-year deadline for completion of the Climate Action Plan.

Comment 2: Policy 1 is silent on tribal, agency and public involvement. It needs to include opportunities for tribal governments, the U.S. Forest Service, agencies, stakeholders and the public to participate in the development of the Climate Action Plan.

Recommendation 2: Add language including tribal consultation and Forest Service consultation and public involvement.

Comment 3: 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.

Recommendation 3: Add language requiring review and approval by the Gorge Commission to determine consistency with the Management Plan.

Comment 4: Policy 1 is silent on what the Climate Action Plan would include. As drafted, it only lists six issues that would be “explored” in the development of the plan.

Recommendation 4: Require the plan to include actions to address a list of climate-related impacts.

Comment 5: The list of issues needs to include ecosystem change, habitat risks, changes to hydrology and the risks of floods.

Recommendation 5: Add ecosystem effects, risk of habitat loss, changes to ground water and surface water and flood risks to the list of issues to be addressed in the plan.

2. Policy 2. (p. 3).

Comment: This policy references climate change indicators in the Vital Signs Indicators (VSI) program, but there are no climate change indicators in the VSI. There are several indicators that examine natural resource features, such as water quality and aquatic habitats. These indicators show that aquatic habitat is “impaired” in the Columbia River and “impaired” within the “lower reaches” of several tributaries of the Columbia River within the National Scenic Area. VSI is supposed to be guiding decisions in plan review. If it was, the Commission staff would have prepared plan revisions to address impaired aquatic habitat, such as improving water resource buffers and wetland protections.

[\(Vital Signs Indicators Project State of the Gorge 2009, Page 25\)](#)

Friends proposed revision (New language in bold blue, deleted language in blue strikethrough, Commission staff proposed in red):

2. The Gorge Commission is committed to long-term monitoring that assesses changing conditions of and climate impacts to the scenic, natural, cultural, and recreation resources, and the economy, of the National Scenic Area. **The Commission will adopt** ~~Through climate change indicators into;~~ the Vital Signs Indicators (VSI) program. **The VSI program shall inform planning efforts, support decision-making, and guide adaptive management. Water resource protection policies and guidelines shall be improved based on the results of the findings in the VSI Project State of the Gorge Report 2009 and the best available science.**