



**Friday, September 4, 2020**

Columbia River Gorge Commission  
PO Box 730  
1 Town & Country Square  
57 NE Wauna Avenue  
White Salmon, WA 98672

**Subject: Revisions to the Management Plan**

Dear Members of the Columbia River Gorge Commission and Staff:

The Southwest Washington Alliance for Community Engagement (ACE) is a group that works to connect SW Washington volunteers and partner organizations in collaboration to articulate, amplify, and address our most pressing local needs and issues around climate change and other environmental and social priorities. We envision a Southwest Washington that safeguards our shared future through our decisions and actions, and we aspire to a renewable and sustainable local economy that democratically reflects the diversity of our community. ACE supports a Columbia River Gorge National Scenic Area that maximizes protection for the scenic, natural, cultural, and recreation resources found there. 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.

**Support Equity Policies**

ACE believes that diversity, equity, and inclusion (DEI) are completely interconnected to responsible environmental stewardship and leadership, thus the decision-making processes of the Columbia River Gorge Commission should recognize the importance of including DEI whenever they implement the National Scenic Area Act. We support the development and adoption of a DEI plan within a year of adoption of the revised Management Plan, with the understanding that such a plan shall be reviewed and updated on an annual basis. The goals for outcomes from such a plan should: ensure a more diverse staff and commission, apply an equity lens to decision making, more actively engage under-represented communities in the region, support affordable housing for urban areas, uphold treaty rights for indigenous tribes and promote policies that support the goals of indigenous peoples, and any other relevant and appropriate goals that are identified as the DEI process evolves.

**Stop Urban Sprawl**

ACE also supports limiting urban area expansion into the management areas of the National Scenic Area as much as possible. Urban sprawl contributes to climate impacts, adds to the destruction of sensitive and vital wildlife habitat, and promotes unsustainable and reckless urban development planning. ACE prefers no decrease to any Scenic Area management lands, but supports the commission's current proposal to limit urban area boundary revisions to 20 acres or 1% of the land area of the urban area, whichever is less; and limit cumulative revisions to, at most, 50 acres (or 2%, whichever is less), so long as all other potential impacts continue to be properly analyzed and accounted for. 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.

### **Adopt a Climate Action Plan**

The Gorge Commission has taken 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 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. The climate crisis is growing worse on a yearly basis, and we are far past the time for minor measures. Drastic action must be taken across all sectors of our society, and that includes every agency and commission you have any influence on. We would like to see the Gorge Commission 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 and examine the prohibition of any loss or destruction of wetlands, buffers for all waterways and waterbodies, and Firewise policies as a part of the Climate Action Plan as they move forward, as well as any other issues related to climate change as they arise.

### **Protect Salmon Habitat, Wetlands and Wildlife**

Please support draft policies to better protect critical Cold Water Refuge (CWR) streams for salmon, wildlife habitat, and wetlands. The U.S. Environmental Protection Agency (EPA), Washington Department of Fish and Wildlife (WDFW), and Washington Department of Ecology support 200-foot buffers on priority CWR streams within the GMA. ACE supports the current draft policies to widen these buffers on the seven CWR streams identified in General Management Areas. However, all salmon-bearing or potentially fish-bearing waterways in the National Scenic Area should receive this increased protection. Please support the 200-foot buffer requirement on all salmon-bearing streams.

ACE supports new policies that prohibit 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.

### **Protect Agricultural Land, Forest Land**

Climate change is increasing the frequency and severity of forest fires. ACE supports new policies limiting new residential development on forest lands. This will help preserve forest lands, reduce fire risks, and protect public safety and property in the event of a forest fire. ACE supports new updates to the farm dwelling standards that will ensure protection of farm land for farm uses and prevent conversions to residential development.

Thank you for your work to protect the Columbia River Gorge and for updating the Management Plan to ensure the future protection of the National Scenic Area for generations to come.

Sincerely,

The Southwest Washington Alliance for Community Engagement

Cc: Office of Governor Jay Inslee:  
Jon Snyder, Senior Policy Advisor, Outdoor Recreation & Economic Development  
JT Austin, Senior Policy Advisor, Natural Resources & Environment  
Office of Governor Kate Brown:  
Jason Miner, Natural Resources Policy Director  
Amira Streeter, Natural Resources Policy Advisor