



September 4, 2020

Mr. Robert Liberty, Chairman
Columbia River Gorge Commission
57 NE Wauna Avenue
White Salmon, WA 98672

RE: Final Decisions on Gorge 2020 Management Plan Update

Dear Chairman Liberty and Gorge Commissioners:

Thrive Hood River is one of Oregon's oldest local land use advocacy groups. Since 1977 our mission has been to protect farms, forests, special wild places and the livability of urban and rural communities in Hood River County.

Thank you for reviewing these comments and for your work over the last few years to strengthen the Columbia River Gorge National Scenic Area Management Plan. As the review process nears its end, please ensure that the most protective amendments and changes to the plan remain or are strengthened, so that the scenic, natural, cultural, and recreation resources of the National Scenic Area remain protected. We support the following amendments and revisions:

Urban Areas: According to the Scenic Area Act, only minor revisions to urban area boundaries are allowed. We support 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. The City of Hood River has a 20-year supply of residential land for development according to a 2015 Housing Needs Analysis. The Commission should conduct a regional analysis prior to proceeding with any urban area boundary expansion to limit urban sprawl and promote the sustainable and responsible economic prosperity of the urban areas.

Climate Change: Thank you for taking 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. Please set a target goal for completion of the Climate Change Action Plan within one year of the adoption of the revised Management Plan. Please continue to include and examine the prohibition of any loss or destruction of wetlands, buffers for all waterways and bodies of water, and firewise policies as a part of the Climate Action Plan as you move forward.

Salmon and Wetlands Protection: Comments from 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, and we support the current revision to widen these buffers on the seven cold water refuge streams identified in the General Management Area. However, all fish-bearing or potentially fish-bearing waterways in all areas of the National Scenic Area should receive this increased protection. Please make continuous review of the 200-foot buffer requirement based on the best available science and improve the buffer protections if necessary, including protections for endangered species – such as potential buffers of 350 feet around ponds and lakes for the Western Pond Turtle, or prohibiting logging and mining in potential pika habitat.

Land Protection: We support preventing the conversion of forest lands to residential or agricultural uses and protecting agricultural land from development or commercial use. We also support limiting new dwellings on forest lands. 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 be prioritizing the protection of Scenic Area resources on management area lands, not promoting residential development. It is also consistent with Oregon’s land use rules which do not allow ADUs on resource land.

Equity, Diversity and Inclusion: The Commission should add policies to the Management Plan to address historic inequities, engage under-represented communities, support indigenous people and treaty rights and support planning for affordable housing within existing urban areas in the Gorge.

Thank you considering these comments and please make them part of the official record.

Best regards,



Heather Staten
Executive Director