

# **Columbia River Gorge Commission Draft Climate Change Action Plan Public Comments**

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**From:** [R Petersen](#)  
**To:** [Climate Action](#)  
**Cc:** [Moriah Shahaf Petersen](#)  
**Subject:** Air quality  
**Date:** Thursday, May 5, 2022 2:48:11 PM

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To whom this may concern:

I read some of the draft for climate action here in the gorge and am disappointed that there seems to be nothing substantial about air quality.

The air quality here in White Salmon in the fall and spring is absolutely appalling and unhealthy in my opinion.

Regulation and burn pile permits needs to be implemented with an added cost to people that burn. I just had a half acre cleared and all branches and logs were recycled to dirt huggers and lumber mill. Why are people allowed to create unhealthy air burning at no cost to them? I am angry and want better legislation to protect my air!

I know two couples that decided to move out of the area because of bad air quality.

Any help and push to change would be appreciated by the majority here in the gorge.

Rick Petersen  
White Salmon, WA

**From:** [Eric Walker](#)  
**To:** [Climate Action](#)  
**Subject:** Executive Summary  
**Date:** Tuesday, May 17, 2022 5:11:30 PM

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Good evening.

It was mentioned during today's Gorge Planner's Meeting that there was an executive summary of the CCAP available, but I wasn't able to find it on the website. Maybe it's embedded in the actual Plan? Was wondering if you had a separate copy of the ES that you could share.

Thanks,  
Eric Walker

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**From:** [JANET WAINWRIGHT](#)  
**To:** [Climate Action](#)  
**Cc:** [Krystyna Wolniakowski](#); [Janet Wainwright](#)  
**Subject:** My comments  
**Date:** Tuesday, May 24, 2022 6:03:22 PM

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While I applaud the Gorge Commission for finally addressing climate change, I feel the CRGC Climate Action plan is neither detailed or forceful enough to deal what is sure to be the defining factor that shapes the world, and particularly the Gorge, in the future. The time to hesitate on this issue is long past. Now is the time for meaningful, unambiguous policies. The following are my first comments on the Climate Action Plan.

### **FIRE:**

It was September 2, 2017 when a fire consumed close to 48,000 acres, much of it in the Gorge. And yet, the CRGC Climate Action plan makes little attempt at addressing this issue.

The New York based non-profit First Street Foundation has modeled and mapped wildfire risk across the United States. The Columbia River Gorge is particularly vulnerable to wildfire now. By 2052 nearly 100 % of the communities in the Gorge will experience catastrophic wildfire. The Climate Action plan must address this head on.

Do not allow, or severely limit, building in small woodland zones.

Mandate (not suggest) all new construction adhere to \* "Firewise" standards. Make this one of the requirements for application approval.

Mandate the temporary closure of public lands during red flag warnings.

Work with the four treaty tribes regarding their "Firewise" practices. They are way ahead of the Columbia River Gorge Commission and US Forest Service on this issue and should be advising the commission.

*\*It still galls me that as a Columbia River Gorge Commissioner my modest proposal regarding Firewise was opposed by several commissioners. Unbelievable!*

### **SALMON AND STEELHEAD:**

Protect salmon runs by increasing buffers around **all** salmon streams. Prevent the degradation of salmon and Steelhead habitat through thoughtful analysis and monitoring. Prevent any development that might degrade what little habitat remains

### **WETLAND PROTECTION:**

Considering the rapid deterioration of wetlands in this region it is imperative the CRGC Climate Action plan takes an aggressive approach and update its GMA

wetlands policy regarding buffer zones in order to achieve **no loss of wetlands**.

#### **PRIORITY HABITAT:**

Limit resource extraction from habitats that have been identified as high priority.

#### **VEGETATIVE SCREENING:**

Mandate all vegetative screening be with species native to the area in the Gorge in which the construction is taking place (the eastern Gorge and western Gorge have different plant species though climate change is rapidly changing that) . This also will help to prevent the spread of invasive species.

#### **INVASIVE SPECIES:**

Educate land owners about the detrimental effects of invasive species. Require management practices to avoid the spread of invasive species. Encourage biodiversity.

#### **AGRICULTURAL LANDS**

Protect agricultural lands by prohibiting nonfarm dwellings on lands suited for agricultural. Limit the size of dwellings on agricultural lands.

#### **TRIBAL TREATY RIGHTS**

The four tribes of the Columbia River Gorge deserve to be treated with as much, if not more, respect, than a county or town within the Gorge. The four treaty tribes have managed this land before Europeans came and they did so successfully. The Climate Action plan must emphasize and forcefully commit to protecting the right of tribal members to hunt, gather foods and fish in their usual and accustomed places. The CRGC Climate Action plan must enhance treaty rights to protect *First Foods*.

#### **DEVELOPMENT**

Limit or prohibit rural residential development and do not allow accessory dwelling units which would increase carbon emissions as well as speed up climate change in the Gorge. It is obvious, more people and dwellings will have a negative impact on the climate and will also increase the chance of fire. Development can take place within urban areas.

#### **TRANSPORTATION**

Transportation is one of the key reasons we have climate change, therefore it is incumbent on the CRGC that this issue be addressed. A regional approach is the only way to effectively work to systematically reduce carbon emissions. The US Forest Service is working on this issue in the waterfall corridor. We should take the lessons learned by the Forest Service and apply it to the entire region.

I will have other comments later.

Respectfully,

Janet Wainwright

[janetwainwright@comcast.net](mailto:janetwainwright@comcast.net)

**From:** [Gabrielle Geller](#)  
**To:** [Public Comment](#)  
**Subject:** Improvements to the Climate Action Plan  
**Date:** Friday, June 3, 2022 10:36:57 AM

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Dear Commissioners,

Thank you for the opportunity to comment on the draft Climate Action Plan for the Columbia River Gorge National Scenic Area. Developing a climate action plan that identifies and anticipates the impacts of climate change in the Columbia Gorge, with specific actions that build climate resilience, is critical to the future protection of the Gorge.

I support the Commission and the Forest Service in the development of a plan that prioritizes specific actions, such as new policies and regulations protecting sensitive resources and reducing greenhouse gas emissions. The draft plan contains a lot of good information, but is lacking in specific actions to build climate resilience. Conducting monitoring, producing studies and developing mapping tools are important, but they need to be linked to specific policy decisions that build climate resiliency in the Gorge.

The plan should not include proposals to increase residential development in rural lands, such as accessory dwelling units. The Climate Action Plan should be encouraging development to occur in existing urban areas where there is ample room for growth, not promoting sprawl into rural areas in the Gorge. It would be a travesty if the Climate Action Plan were used by development interests to expand rural residential development in the National Scenic Area.

Please include the following actions in the Climate Action Plan:

- Protect water resources by increasing protective buffers around all salmon streams and wetlands
- Protect Priority Habitat areas by designating these lands as protected open space.
- Protect forests by preventing industrial-scale clearcutting.
- Require new land uses to prevent the spread of invasive species and promote biodiversity.
- Reduce the risks of wildfires caused by new land uses and development. Restrict new residential development in woodland zones.
- Adopt new policies to protect treaty rights and traditional “First Foods.”
- Prevent the loss of agricultural lands by preventing nonfarm dwellings on lands suitable for agriculture.
- Promote regional transportation solutions reducing greenhouse gas emissions.
- Prohibit the expansion of fossil fuel infrastructure and reduce reliance on natural gas.
- Prevent urban boundary expansions.

Thank you for considering these comments and adopting a plan with meaningful actions that increase climate resilience in the Gorge.

Regards,  
Gabrielle Geller  
37 Nestor Peak Rd  
White Salmon, WA 98672



June 13, 2022

Columbia River Gorge Commission  
PO Box #730  
White Salmon, WA 98672  
(Sent by email to [connie.acker@gorgecommission.org](mailto:connie.acker@gorgecommission.org))

Subject: CRGC Climate Change Action Plan Draft

Dear Commissioners;

Thank you for the opportunity to provide comment on the draft Columbia River Gorge National Scenic Area Climate Change Action Plan.

Given the limited window of opportunity to review and comment on the draft, I reached out directly to various partners to collect comments on the proposed policies, methodology, and anticipated impacts.

For ease of review, I have separated the categories of comment by headers and italicized and credited comments as appropriate. The intent is to share insight from subject experts on the proposed Climate Change Action Plan (CCAP) impacts and to offer recommendations to strengthen and improve policies and strategic action in the CCAP.

### **Agriculture**

The CCAP (Part I, page 17 and Part II, page 55) recommends, as a strategy to protect winter range habitat and maintain or restore connectivity, “limiting new cultivation.” I could not find evidence, data, or other information in the CCAP to point to the source of this strategy or the perceived outcome or impact limiting new cultivation would have on preservation of winter range habitat.

In a paper cited by the CCAP (Halofsky, 202x) on oak woodlands, the non-climatic stressors identified for oak woodland ecosystems include “lack of fire, increased density of conifers, land development, invasive species, and urban recreation.” This analysis, which is further supported by a Vulnerability Assessment for the region by the same organization identified grazing, not cultivation, if unmanaged and/or excessive, to be a contributor to the spread of nonnative grasses.

The National Climate Assessment (2018) acknowledged climate change impacts to agriculture and the wide spread impacts resulting in “large scale shifts in the availability and prices of many agricultural products”. Their recommendations to address climate change, related to agriculture, included: altering what is produced, adopting new technologies, and adjusting management strategies. In speaking to subject experts, they concur that we are at a critical time of declining productivity. Given the

preponderance of evidence (Brown, 2015) that climate change will have a direct impact on global food systems, the important contributions Wasco and other Gorge counties make to US food production and exports, and significant efforts to improve and leverage improved agriculture methods to combat climate change, removing new cultivation from our landscape appears to be the opposite of broad recommendations.

The District Manager, Shilah Olson, for Wasco County Soil and Water Conservation District (SWCD) shared concerns about limiting agricultural: *(W)e are in the midst of a global food crisis and local food systems should be prioritized. This topic should be considered and weighed carefully...Rather than limiting new cultivation, the Commission might consider incorporating food plots for wildlife as a management practice to enhance foraging habitat.* SWCD/NRCS staff added: *Cultivated cropland...provides fire breaks in these areas. (L)imiting new cultivation will likely be inconsequential in global climate change.*

CEO of Oregon Wheat, Amanda Hoey, expressed similar concerns: *Agriculture provides a means for mitigating the impacts of climate change and investing to local economies. The CRGNSA Climate Action Plan discourages agricultural production, disadvantages family farms at the expense of recreational uses/tourism and does not consider the research being conducted on agriculture's contributions to mitigating climate change. The Gorge Commission should be crafting plans and policy that supports ag production and lessens the burden to family farm operations, particularly as we face global food insecurity.*

*The agriculture industry has made substantial investments into research on soil health and climate impacts, leveraging research partners and federal funding to address challenges for ag producers. In the wheat industry, specific investments to research include:*

- *Soil Health/Carbon Center (\$1.5 million)*
- *Resilient Dryland Farming (\$2 million annual)*
- *Variety development adapted to changing environments and conditions (\$800,000 to \$1 million annually)*

Ms. Hoey has shared additional information about these critical research efforts that showcase the investment the agricultural community is currently making to combat the impacts of climate change:

***Resilient Dryland Farming: \$2M annual funding, beginning in FY2019***

*Dryland wheat farming on the eastern side of the Gorge is constrained by low annual rainfall, which is close to climatic limits of production. Therefore, the regional economic sustainability is extremely vulnerable to changes in rainfall patterns, increased drought duration, and warmer growing seasons. The Resilient Dryland Farming Initiative was proposed by Oregon wheat producers to work with Oregon State University and USDA Ag Research Service on cropping systems. It was initially funded in fiscal year 2019 and has a \$2 million annual allocation.*

***Soil Carbon Center: \$1.5M in FY2021***

*Seeing the benefits of the resilient dryland farming research, the wheat producers advocated to establish a Soil Carbon Research Center at the USDA Agriculture Research Services, Pendleton Agriculture Research Center. Of particular value were the long term cropping system studies established as far back as 1931 at the research station, the wide-ranging expertise of the current faculty, and the close relationships forged between regional farmers and USDA ARS and OSU researchers. Through legislative support, \$1.5 million in federal funding was secured in FY 2021 to establish the center. Funds evaluate effects of dryland crop production in Oregon on emissions and provide information on effective cropping systems that benefit carbon, nitrogen, and water dynamics, crop productivity, and economic outcomes. The Center focuses on:*

- *Assessing and monitoring long term and future changes in soil carbon levels resulting from existing and improved agricultural management practices:*
- *Quantifying gaseous carbon emissions from dry cropland used for production of cereals, legumes, and oilseeds;*
- *Establishing rates of soil carbon accrual and sequestration in the landscape at the regional level, and*
- *Investigating novel pathways towards increasing the sustainability of dryland crop production.*

### ***Oregon Wheat Commission: Roughly \$1M annually***

*Wheat producers ‘tax’ themselves in the form of assessments and with those dollars, about \$1 million goes to research projects annually. The bulk goes to evaluation and development of new high yielding disease resistant varieties. Funds are allocated directly through University partnerships for primary research in plant pathology work, weed control programs, and continuation of critical disease research. This research has led to the development of more drought tolerant varieties, requiring fewer inputs for management.*

The National Climate Assessment acknowledges that preservation of agricultural land for agricultural purposes has benefits. It safeguards the lands from conversion to urban uses, helps to ensure the livelihood and sustainability of rural communities and economies, and offers “one of the few sectors with the potential for significant increases in carbon sequestration to offset GHG emissions” (2018, p. 397). While the CCAP cites OHA statewide data on GHG emissions, it also doesn’t consider the many regional practices that serve as a benefit to our environment including: no till policies for water and soil retention, significant investments in riparian area restoration and improvement, active land management to prevent catastrophic hazard events or invasive species, and significant investment in research that can provide tools like improved carbon sequestration. The literature suggests that “danger is that action taken on agricultural emissions might reduce the focus on decarbonization” or other measures that, while allowing for short term gains, will result in us being “climatically worse-off” (Lynch, p. 9, 2021).

Some of the farmlands, specifically orchards, within the National Scenic Area in Wasco County that are identified as deer and elk winter range actually have historic land use patterns and agricultural practices that the Oregon Department of Fish and Wildlife have deprioritized for habitat. Wasco County recently went through a significant Goal 5 updated with deer and elk winter range outside the National Scenic Area to better protect habitat from one of the more significant concerns, conversion of agricultural land to non-agricultural uses. Agricultural uses, specifically grazing and wheat production, have been long held to be non-threatening to deer and elk winter range, which is why we were able to adopt exemptions for agricultural activities in our non-National Scenic Area lands. What the update did

address was conversion to non-resource uses, like commercial renewable energy projects. It is not hard to see how a limitation on farming might result in increased conversion of farm land. It has been ODFW's position that most agricultural land in Wasco County, and local farming practices, actually help to protect and preserve wildlife habitat and that the larger threat is conversion of land to more urban uses, including certain types of recreation uses.

The assumption that restricting new agricultural activity will rehabilitate long term wildlife habitat and migration paths is not based on significant evidence in current research. A literature review (Konig, 2020; Bergstrom, 2017; Carter, 2020; Chapron, 2020; Foley, 2005; Jordan, 2020; Madden, 2004; Martin, 2020) suggest that the dominant paradigm in understanding agricultural practices and wildlife is co-existence, and that there is "no one size fits all solution" (Jordan, p. 793, 2020). I would urge the Columbia River Gorge Commission to reconsider policies that unnecessarily restricts agriculture in deference to the subject experts, and look for alternative ways to achieve resiliency in winter range for deer and elk including those recommended by our partners.

One recommendation in the plan is to consider best management practices or requirements for new agricultural uses. Shilah Olson provides the following: *These services are provided by both the SWCD and NRCS, and I would recommend the Commission to tie back to the work we are already doing by requiring individuals seeking new agricultural uses to obtain an approved management plan through either the local SWCD or NRCS.*

Amanda Hoey addresses current farm management practices in Wasco County that benefit the environment, including low intensity tillage and precision agriculture, which reduce output of Co2 and fuel usage, respectively. Oregon Wheat *encourage the Commission to have conversations with producer associations who are integrally engaged in research on climate mitigation in agricultural systems, become familiar with the practices in use for production systems used in farming operations in the Gorge and avoid prescriptive practices such as cover cropping not well adapted to the lower rainfall areas that are not grounded in the current research being done for agricultural management in relation to changing climates.*

## **Recreation**

Recreation is minimally identified in the CCAP as having an impact on increased congestion and greenhouse gas emissions. However, as works cited in the CCAP indicates, it also needs to be scrutinized for its broader impacts to sensitive lands. The Vulnerability Assessment for the region specifically identifies recreation as a "stressor" on habitat and wildlife. Another article cited by CCAP (Monz et al, 2020) identifies recreation trends of "increased use and associated disturbance" as having "cumulative effects" that have a "combined influence...greater than that from any single component effect" and states that the many "current threats associated with nature-based tourism are likely to be amplified by climate change". These concepts, or policies to combat identified stressors and impacts, are absent from this plan.

Our partners at the Wasco County Forest Collaborative provided the following comments: *"The single largest source of carbon dioxide pollution and environmental degradation on the east side of the Mount Hood National Forest is human recreation. Recreational users start fires, intentionally and unintentionally, that may threaten communities, drinking water, and critical habitat. Recreational users also disrupt patterns of wildlife use. Trails and roads contribute to sedimentation of streams. Addressing these issues is critical to finding a balance between the multiple values forests provide."*

Works cited in the CCAP, input from key stakeholders, and other literature related to climate change (Chan, 2020; Aguiar, 2013; Dundas, 2020; Loomis, 1999; Mendelsohn, 1999; Obradovich, 2017; Richardson, 2005; Hall, 2005; Irland, 2001; Hewer, 2018; Miller, 2022) identify the considerable impact climate change will have to recreation which, in turn, will have an impact on the environment including habitat and wildlife. It is imperative this plan identifies policy to support recreation managers in the National Scenic Area with the “management challenges” they face in this uncertain future (O’Toole, 2018). This may include reducing or eliminating access to sites “vulnerable to climate induced risks”, planning for impermanence with temporary structures, reducing permitting barriers to allow for improvement and resiliency of existing facilities, and developing “communication tools that inform visitors of the reality of environmental change” (O’Toole, 2018). Considering that many of our treasured and sacred places in the Columbia River Gorge National Scenic Area already suffer from being “loved to death” (Gorman, 2019; Pesanti, 2017), it is imperative any climate action plan addresses a future where access may be in higher demand with more limited resources.

The CCAP (Part 1, page 19) identifies recreation as significant impact to talus slopes, but does not make recommendations to limit recreation activities in these areas. The focus on other land uses to the exclusion of recreation is not supported by evidence or rationale.

The plan must acknowledge the climate induced risks to recreators that have an impact on local emergency services and infrastructure and the impact visitors have on our habitat and wildlife. Time used permits, similar to those instituted on Federal lands in the Waterfall Corridor, are one example of a possible strategy to reduce overuse and impacts to both local services and wildlife.

### **Forest Zones**

Wasco County is strongly in support of reducing permitting barriers for forest resilience treatments. This has been a long standing request from many of our partners, and they have some recommendations for how to best achieve this policy.

Shilah Olson, of SWCD, states: *I was glad to see the suggestions to streamline permitting for conservation activities, as that is an area of frustration for us working in voluntary conservation. Our projects are designed to protect, restore, and enhance the environment utilizing best management practices and yet we find permitting and/or land use reviews and approvals to be a frequent challenge.* Ms. Olson indicates a “strong preference to see voluntary incentives” over regulatory measures.

Andrew Spaeth, of the Wasco County Forest Collaborative, states: *The scenic area should be prioritizing forest restoration and wildfire risk reduction over things like aesthetics, which seem less objective and important in the face of climate change, wildfire, and drought.*

The CCAP continues the recent updates to the Management Plan to limit dwellings in the forest zone. The Oregon Land Use Planning Program makes a distinction between forest dwellings, or dwellings used in conjunction with forestry operations, and non-forest dwellings in forest zones. Forest dwellings, like farm dwellings, help maintain the sustainability and management of forestry operations. By indiscriminate elimination of the opportunity for new dwellings in the forest zone, the unintended outcome is to exclude potential for new forestry operations, including restoration or active management, to be developed when they rely on siting a home in conjunction with forestry activity. I encourage the Commission to consider evaluating a modified approach to allow for forest dwellings, in conjunction with forestry operations, to allow for management of forest lands.

We support efforts to reduce wildfire risk. Many efforts are currently underway in Oregon to inventory and develop new criteria for development of properties within the Wildland Urban Interface (WUI). Several strategies have been recommended by the Oregon Department of Forestry, Wasco County Forest Collaborative, and the Wasco County Community Wildfire Protection Plan Steering Committee, including: hardening practices, defensible space, fuels reduction, and forest restoration treatments. I would encourage CRGC staff to participate in ongoing statewide efforts to ensure for consistency, eliminate redundancy, and to follow subject experts and best available data on current recommendations.

Kristin Dodd, Unit Forester for the Oregon Department of Forestry, encourages CRGC to work with the Oregon Department of Forestry, the Oregon State Fire Marshal's Office, and the OSU Extension office to advance efforts. Ms. Dodd also shares a concern, related to wildfire hazards, about the blanket policy for trees to be used for scenic screening: *While I recognize that screening trees are required to protect the scenic view aesthetics in the Columbia River Gorge, there is a wildfire risk associated with this requirement, in my opinion. My concern is that the location of certain screening trees is in a place that would not align with defensible space standards for mitigating wildfire threats to homes and structures. Often times, these trees are dead, causing more concern with mitigating fire risk to the structure. Also, they aren't allowed to be cut and if they are, replacement trees are required to be planted. That said, I do understand and recognize that the placement/location of screening trees may not be a wildfire threat across the board.*

### **No Net Loss Oak Woodlands**

Wasco County appreciates CRGC efforts to protect oak woodland habitat. However, we share some concerns about the recommended policies with subject experts.

Andrew Spaeth from the Wasco County Forest Collaborative provided the following comments on this policy: *I think we'll see Oak expand in its range as a result of climate change and a hotter/drier future. No net loss applied in this context is somewhat confusing. Oak systems are going to shift and move across the landscape, which is different than wetlands where this type of policy perhaps came from. The primary threats facing oak are 1) conifer encroachment and 2) human-related development. Restoring oak habitat through active management (thinning, rx fire) should be our top priority. There are often co-benefits to that work including improved wildlife habitat and reduced risk of uncharacteristic wildfire. Finding a balance between development and habitat loss seems more challenging, especially given the affordable housing crisis we're facing.*

Kristin Dodd, Unit Forester for the Oregon Department of Forestry, also provided comments on the no net loss oak woodland policy proposed: *While I agree with the overall concept of retaining oak woodlands, I also think that in order to improve oak woodlands and mitigate fire hazards, we should be able to remove some oak trees...removal would be tied to goals, strategies, and plans for oak habitat restoration and improvement.*

Wasco County Planning staff has shared that the no net loss of oak woodland acres or functions can be difficult to do outside of a development review or without a development permit in place. We would also echo Mr. Spaeth and Ms. Dodd's concerns that a no net loss policy may have the unintended consequence of prohibiting active management and restoration activities. It is not uncommon for our woodlands to be ravaged by fire or disease, in which case it's critical to mitigate through thinning and removal. It will be important to have a more dynamic policy that can engage continuously with a variety

of subject experts to evaluate individual oak woodland stands and habitat to assess a case by case strategy for preservation, restoration, and management.

### **Wetlands, Streams, and Riparian Areas**

Part I, page 13 of the CCAP references partnerships with state and federal agencies related to Total Maximum Daily Load (TMDL) standards. Wasco County currently administers two TMDL implementation programs for our County, including the Miles Creek Subbasin which consists of tributaries that feed into the Columbia River, and pass through the National Scenic Area. Our implementation program consists of a variety of efforts from the Planning Department, Soil and Water Conservation District, the Household Hazardous Waste and Recycling Program, Code Compliance, and other partners. We are required by the Oregon Department of Environmental Quality to report on our efforts annually as the Designated Management Agency (DMA). I would encourage CRGC staff to reach out to local jurisdictions, including urban areas, to learn what we are already doing locally to address TMDL goals.

The CCAP recommends increasing stream buffers. Current stream buffers are consistent with state and federal requirements and best available data, so it is not clear what the foundation for across-the-board increases are or what the benefit would be. In Wasco County, the majority of properties with riparian areas contain steeper slopes and/or heavy vegetation that deters development due to higher costs. We would encourage a thorough analysis of existing development near delineated wetlands/streams/riparian areas to identify existing patterns before making policy revisions.

No wetland loss is recommended for GMA wetlands. As we commented during Gorge 2020, this has unintended impacts. Former Director Angie Brewer commented on September 8, 2020: *Requiring a standard of No Loss equates to no maintenance or modifications of critical infrastructure, posing an unnecessary safety risk and undermines our regional resilience for natural hazards planning.*

### **Mining**

The CCAP extends the theme from the Management Plan update (Gorge 2020) to reduce or eliminate all mining in the National Scenic Area. While the plan focuses reduction in areas with talus slopes, we would encourage analysis to ensure that those mining sites are not critical to regional and local infrastructure.

Arthur Smith, Wasco County Public Works Director states that eliminating existing aggregate pits from the National Scenic area *would work directly against...objectives—increased GHG emissions as we truck in the aggregate from other pits that are located many miles away.* Mr. Smith provides the following hypothetical to illustrate the issue: *the county rock pit in the NSA on Sevenmile Hill is shut down. To serve The Dalles and Mosier area, I now need to haul rock from our next closest pit - Tygh Valley. This is an increase of at least 30-45 miles one way. These increased haul miles would be diesel burning dump trucks, not EV vehicles (there are currently no EV dump trucks available on the market). My Google research found that a truck emits anywhere between 160 to 400 grams of CO2 per mile. So, every extra mile that trucks are forced to travel make significant increases in the GHG emissions.*

### **UGB/UGA Expansion**

The CCAP advocates for new policies related to UGB/UGA expansions to include “consideration of equity impacts and greenhouse gas emissions.” This is not operationalized in a way that can provide a clear

understanding of the methodology or potential impacts of such policies. We encourage the Commission to remove this policy recommendation until such a time a methodology for these policies are clearly identified and can be understood to ensure for a clear process by which jurisdictions may request a UGA expansion.

### **Diversity, Equity, and Inclusion (DEI)**

Wasco County supports the emphasis on improving outreach and engagement with all citizens and impacted parties on new policies and regulations in the National Scenic Area. We support the CCAP's goal to encourage participation from youth, indigenous, and non-English speaking immigrant populations. While Wasco County is aware CRGC staff is currently engaged in a concurrent DEI plan, we have some specific recommendations for inclusion in the CCAP.

First, we would like to see the acknowledgement that people in poverty are one of the populations of people most impacted by Climate Change (OHA Report; Oregon Climate Change Adaptation Framework). Second, we encourage language to be modified to be more inclusive of non-immigrant minority populations. Finally, we strongly advocate that CRGC adopt, as consistent with the intent of the National Scenic Act and bi-state compact, the more restrictive Oregon Statewide Goal 1 regulations with regard to citizen involvement, including newspaper notices and mailed notices that adhere to Oregon Revised Statutes 215.503. The current recommendation in the CCAP for achieving increased engagement is coordination with a few non-profit groups. To reach the broadest amount of people, including those in poverty that have limited access to the internet and may not be connected with identified non-profit organizations, it is necessary that all impacted landowners receive early and ample notification.

### **Methodology and General Formatting**

Finally, we have a few concerns related to the transparency of methodology on which policy recommendations are made. For ease of summation, I have bulleted our concerns followed by recommendations.

- The claim that "Planners can assess oak condition and function" assumes a level of training and knowledge about trees and environmental conditions that exceed the ordinary education of planners. In practice, planners rely on subject experts to provide comment on a variety of resources, including trees. The shift in policy to place that responsibility on planning staff is tantamount to an unfunded mandate that will require significant investment of education in training staff or hiring a qualified expert. We would ask this policy statement be removed from the draft.
- There is sufficient discussion in the CCAP of "climate resilient lands" but County staff has not had the opportunity to review draft maps, methodology, or even a definition of what determines climate resiliency. There are also some assumptions in this section that land trusts and public entities are better stewards than private ownership, recommending a conversion of these lands to quasi-public or public. I would like to understand the methodology for these statements and how local jurisdictions will be compensated for potential exaction claims and the loss of tax base.
- The VSI monitoring model should be completed, prior to the final adoption of the CCAP draft, so

that all partners may evaluate the methodology and potential impacts.

- The maps inserted throughout the document are unreadable at the current scale.

Thank you for the opportunity to provide comment and recommendations to strengthen the Columbia River Gorge National Scenic Area Climate Action Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelly Howsley Glover". The signature is fluid and cursive, with the first name "Kelly" being the most prominent.

Kelly Howsley Glover  
Wasco County Planning Director

## Bibliography

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**From:** [Lotus Boyanton](#)  
**To:** [Climate Action](#)  
**Date:** Thursday, June 16, 2022 10:32:32 AM

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We need more biodiverse native species of plants in the dalles, need more parks and greenery like portland, consider native flora and fauna as the climate warms, make electric vehicles cheeper!!!

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Sincerely,  
Lotus Boyanton



June 17, 2022

Dear Columbia River Gorge Commissioners,

As climate change is the most urgent threat to the future of the National Scenic Area, I appreciate this opportunity to comment on the much needed and long overdue Climate Action Plan.

**Oak Woodlands:**

The pine oak habitat found in the Gorge is a critical and unique habitat that needs to be maintained and enhanced with no net loss. Over the past 48 years I have seen the oak habitat in the Mosier area degraded with oaks routinely removed as properties are developed. The big game winter range used to reach the Columbia River and has become fragmented over time.

For these reasons, I support the actions and strategies for oak woodlands outlined on P. 55-56 of the draft. Working with the East Cascades Oak Partnership will provide valuable insight into solutions.

**Fire Risk:**

After experiencing 3 mandatory evacuations over the years, I support the goals and strategies to reduce fire risk (p. 61-62). One concern I have is fuels reduction work that is improperly done, such as the unnecessary removal of oaks.

At a recent meeting, ODF representatives stated that 96% of the fires in Wasco and Hood River counties in areas served by ODF are human caused. The restrictions on new development in these areas are needed.

**Streams and Wetlands:**

Increasing stream buffers and the other strategies are needed to help ensure salmon (and the orcas who depend on them) survival. (p. 49-50).

With the reduced flows and warming temperatures due to climate change, western pond turtles, listed as endangered in Washington and threatened in Oregon, are hanging on to existence in the Gorge. We no longer see them in our area of Mosier. The wetlands strategies and priority actions are very much needed (p. 51-52).

As western pond turtles can lay their eggs 100 meters from their ponds, buffers from ponds and lakes need to be increased to protect endangered turtles.

Thank you for this opportunity to comment.

Sincerely,

Sheila Dooley  
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Mosier, Oregon 97040  
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