

[Email received 6/24/20 from Bonnie New, bnew1@live.com]

Members of the Gorge Commission,

Thank you all for your work developing proposed changes to the Management Plan over the last several years. There are many worthwhile changes in the Plan proposal. I wish to bring your attention to several areas that I strongly believe need strengthening before the final version is released.

1. Climate Change

I'm glad to see the new "Climate Change" chapter in the Management Plan (MP), but there's no actual climate action plan. It refers to developing such a plan in the future, but THE NEED IS NOW. We need to have specific policies in place for climate adaptation and mitigation, and a specific timeline. A one-year deadline for adopting a climate action plan is demanding but doable. A looser, more nonspecific approach is neither practical or ethical given the pressing should-have-done-it-yesterday nature of climate change.

2. Water: Streams, Wetlands, Ponds, Lakes

The entire Gorge is defined by water. We need robust protection for the water itself (water quality and quantity), in all its upstream forms (streams, wetlands, ponds, etc.). And we need protection of habitat surrounding the water, especially for the many species that are currently at risk. 12 stocks of salmon are listed as threatened or endangered on the federal and state endangered species lists.

- The Commission should immediately institute a 200-foot protective buffer on each side of all fish-bearing streams in the National Scenic Area, as has been the standard for nearly 30 years in the Special Management Areas (SMAs). That can and should be done pending completion of the Climate Change Action Plan.
- The MP needs to specifically prohibit the loss or destruction of wetlands. As with the 200-ft streamside buffers, a "no loss" standard to wetlands protection has been applied for nearly 30 years in the SMAs.
- The Gorge MP currently provides a 100-foot buffer for perennial streams and a 75-foot protective buffer for wetlands, ponds and lakes in forest habitat. Those buffers should be increased to a minimum of 330 feet. Western pond turtles, which are "endangered" in WA and "sensitive/critical" in OR, lay their eggs on land 330 feet or more away from streams, ponds and lakes.

3. Urban Sprawl

To preserve the Gorge NSA, the Commission MUST prevent urban sprawl. Existing land use laws are NOT sufficient to do this for two reasons. First, they apply to each incorporated city individually. The NSA needs to institute a regional, not city-based, analysis of development potential. And second, urban boundary revisions are made and implemented by individual cities, who will each have differing approaches and ideas on what a "minor revision" is. The Commission should provide a uniform definition of "minor revision," to be up to 20 acres or 1% of the land area of the urban area, whichever is less. In addition, this calculation should be cumulative over time.

Thank you for the opportunity to comment on the proposed changes to the MP. I will watch with interest as the proposal is modified and finalized.

Yours,

Bonnie New
Hood River, OR

Be joyful though you have considered all the facts. - Wendell Berry