

[Email received 6/29/20 from Douglas M. Crow, dcrow@pacifier.com]

Please let me know if you need clarifications. The following 3 comments are respectfully submitted:

Comment on Forest Protection and Management

By far the most significant event in the last 30 years was the Eagle Creek Fire, but little seems to be mentioned or reflected in changes to the NSA Plan. Fire protection and prevention should go far beyond dwelling placement and protection. In both the GMA and SMA measures should be taken to reduce the fire danger. Many actions could be taken, for example, the thinning conifers along I-84 that grow densely on disturbed ground and could be flashpoints. There should be a complete review of the burned areas in the GMA for possible salvage removal, rehabilitation and watershed conservation. While engaged in these activities the Forest Service should consider creating primitive road access and heliport development for future fire control. The Plan should establish a comprehensive report delivered to the Commission every 5 or 10 years for the next 50 years to report on the recovery and any actions needed to protect these adversely impacted natural resources in both the GMA and SMA.

Comment on Buffers for Western Pond Turtle. (Guideline 2A, page 116)

At present the buffer corresponds to the pond buffer of 75 feet. The Western Pond Turtle is wide ranging between ponds and other wetland habitats to dry land areas that offer seasonal foraging and nesting habitat. Extending the buffer to 330 feet minimum will only create conflicts and enforcement issues with land owners/users to include agriculture (grazing, orchards and crop cultivation), forestry and existing residents. I suspect that more damage than benefit will result. Expanding the buffer to 100 feet will help create consistency and minimize conflicts. The turtles' range is in miles so the 330 feet really has little real protective value. The better approach maybe to provide education and advisory assistance to local land owners to help gain cooperation in protection of both nesting areas and habitat. In areas of habitat should be surveyed to evaluate their condition and plans set forth to rehabilitate them as needed.

Comment on Climate Change and Flow Temperature.

The NSA's stream habitat for trout and salmon is very limited due to topography. Most streams passage for fish is blocked by major water falls. Further the majority of the watersheds are outside of the NSA boundaries. Any change in protections will have little or no impact on water temperature. There is a need for the evaluation of stream bank vegetation to plan for rehabilitation measures to include fencing, notice to users, woody debris and plants. For example, Rock Creek in Mosier was devoid of vegetation below the old Scenic Highway bridge 20 years ago (about 150 yards from confluence with the Columbia River) and efforts to rehabilitate has produced protective vegetation on the stream banks and improved habitat for salmon that spawn in the upper reaches of this seasonal stream.

Submitted by Douglas M. Crow, Mosier, Oregon on June 29, 2020