To the Columbia River Gorge Commission,       June 30, 2020

I write with respect to the Climate Change Chapter in Gorge 2020. I applaud the inclusion of this existential issue, as well as the top-line summary of the new chapter:

“Climate change poses the most wide-reaching and urgent challenge facing resource management agencies today. The National Scenic Area is particularly vulnerable to the extremes of climate change impacts, including wildfire, given its topography and high winds.”

In submissions received by the Gorge Commission in March 2017 for Gorge 2020, fire departments and planning departments throughout the Gorge urged the Commission to emphasize Firewise Communities Program best practices in the updated National Scenic Area Management Plan, and encouraged the use of Firewise guidelines for construction, access, defensible space, and maintenance of homes built in the Gorge.

Per Firewise information materials, most catastrophic wildfires are driven by high winds, a regular feature in the Gorge, particularly during the hot summer. The tremendous damage in the Columbia Gorge from major wildfires in the past three years since these submissions were delivered, sharply underscores the importance of all Gorge residents, as well as the Gorge Commission, doing their part to mitigate the risk of wildfire, promote best practices in environmental stewardship, and protect the scenic, natural, recreational, and cultural resources throughout the Gorge.

I have confirmed with Lisa Naas Cook that the Framework for Action in the Climate Change Chapter only applies to the General Management Area (GMA) of the Gorge. I urge the CRGC to include the Special Management Area (SMA) as well.

Portions of the SMA are among the most vulnerable to the increasing risk of wildfire due to the hotter and drier summers. For example, the popular hiking trail near Catherine Creek, within the SMA, is among the areas rated “very high” for wildfire risk in the 2018 Washington State Department of Natural Resources’ Wildland Fire Protection Strategic Plan. This area also has a history of devastating wildfire damage, yet at this time the only land designation with fire protection policies is forest land.

I appreciate and acknowledge that tribal lands are rightly the jurisdiction of the Tribes themselves, who have been careful custodians of the land for countless generations. I understand that the U.S. Secretary of Agriculture has primary responsibility for Federal lands in the SMA, and has delegated this responsibility to the U.S. Forest Service. However, I cannot find any reference to the Secretary of Agriculture (or the Forest Service) having primary responsibility for non-Federal lands in the SMA, including privately-held land in the SMA. The Management Plan suggests that the Forest Service provides an important advisory role to the Gorge Commission and its Executive Director on issues regarding these areas.
I expect we all agree that the Special Management Area contains invaluable scenic, natural, cultural, and recreational resources that deserve enhanced protections against climate change. To ensure a coordinated and comprehensive approach to this growing challenge, there should be no differentiation in how GMA and SMA land are treated in the Framework for Action. After all, fire does not heed area boundaries drawn on a map, nor can climate change impacts be confined to one area of the Gorge. If the Gorge Commission decides to not include the SMA in the Framework for Action, then an alternative approach might be to reclassify all privately held lands in the SMA as GMA to include these areas in the Framework for Action.

I urge the revised Columbia River Gorge National Scenic Area Management Plan to include SMA land in the Framework for Action to address climate change impacts through an integrated climate adaptation and mitigation approach. I also urge the Commission to emphasize Firewise Communities Program best practices in the updated National Scenic Area Management Plan, and encourage the use of Firewise guidelines for construction, access, defensible space, and maintenance of homes built in the Gorge.

With Best Regards,

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