

June 28, 2020

Hello, my name is Deb Lawless. I have property in the Coyote Syncline area and would like to comment on the Gorge2020 plan.

The Columbia River gorge is indeed a place of great beauty that we are all lucky to live near or in. I am grateful for the existence of the National Scenic Act and the Gorge Commission to help to keep it that way for us all - and I do mean ALL of us - residents and visitors from near and far, both present and future, who can claim ownership of this national treasure.

Of great importance to me is the preservation (and indeed enhancement) of natural resources. These are the reasons the national scenic area was created in the first place, and remains the #1 goal for management of this unique area. There should be no further loss of any parts of this great ecosystem- wetlands, forest, waters, air. We should be tracking keystone species and monitoring forest and water health. How are these systems being impacted by increased development and recreation (what happened to the VitalSigns project)? What are impacts of climate change that we are already seeing, and what can we expect in the future? How can and should we be proactively working to reduce expected impacts? We should have a very specific and measurable plan for this in place. This climate change and resource protection plan should be based on the best available and current science - not federal agency standards. We know that these standards are low (and increasingly are being eliminated!), and they are not set with the goals of the National Scenic Act in mind.

I started to read through the Natural Resource chapter (the draft chapter showing the edits made), and found myself wanting to almost constantly comment.....

Page 2: "Guidelines that require Best Management Practices and resource protection policies are applied to development activities to prevent and minimize adverse effects to natural resources." Shouldn't guidelines simply prevent adverse effects? Has 'minimal' been defined?

Page 3: Water resources are listed as wetlands, streams, ponds, lakes, and riparian areas. What about the Columbia River??!!!! This is a critical and central resource that needs focus and help to address climate and wildlife (especially salmon) concerns. As we have seen, especially most recently, the federal government is not a dependable partner for protection.

Page 3: "In the GMA, exceptions are made for several uses, including low intensity uses and water-related and water-dependent uses, if there is no practicable alternative and adequate protection of the resource is provided." How is 'adequate protection' defined? How does allowing for these exceptions square with the first goal of the national scenic act?

Page 3: "New development is prohibited in the buffer area, though exceptions/variances may be made in the GMA if the buffer would deny all reasonable use of a parcel." What is the buffer zone/ how is it defined? For new land ownership (post creation of the NSA), there should be a responsibility for the buyers to determine if their desires match with those of the NSA management act.

Page 5: GMA goals regarding wetlands: Wetlands are a precious resource. Prohibit any loss of wetlands by applying a "no loss" standard to wetlands protections. This standard has been applied for nearly 30 years in the SMAs and needs to be applied to the GMA. You cannot create a wetland (or really any type of ecosystem) that functions anywhere near as well and as efficiently and effectively as Mother Nature can.

Page 17: Section 1, C4. What are the criteria for the species on this list? The government lists that I was able to find for endangered species were from 2008. Do we really want to be operating on 12 year old information? Also, given all the listings for the Columbia River Basin salmon stocks, should we not be doing something proactive to help preserve these keystone species, unique to this set of ecosystems? The management plan also says that these lists are available on the Gorge Commission website - I did a search on 'endangered' and 'threatened' and in both cases the results were 'no results'.

Instead of continuing in this piecemeal fashion, I thought it might be more effective to focus on a couple of themes:

1. Mitigation?? From the Oxford dictionary, mitigation is "the action of reducing the severity, seriousness, or painfulness of something." This is not proactive protection work, this is reactive. In the draft plan, "mitigation" takes the place of "rehabilitation and enhancement". These are not equivalent meanings. Mitigation is not enough, and in fact we should be making efforts to improve the health of these ecosystems.
2. Why do we say that things warrant protection and then in the next sentence say that development or uses that impact natural resources without any practicable alternative may be possible? Ultimately this doesn't inform me about how or when things will be protected, and when they won't.

In order to preserve natural resources, we certainly should NOT be increasing urban area boundaries. The most efficient and effective use must be made of the urban lands that already exist. I would ask - is a national scenic area not as sacrosanct as a national park? Would we want increased urban boundaries and development in the Grand Canyon? In Zion? This is a national scenic area that is meant to be an area for ALL to recreate and enjoy. Indeed, the very nature of this national 'playground' injects a lot of tourism dollars into the local economies. I would also ask, what are the goals of those who would chose to increase urban areas? Do they align with the overall goals of the National Scenic Act? What is the future state that they envision for our National Scenic Area?

I might also add, that this seems to be a very contentious point of the new plan. As there are strong opinions on both sides, I wonder if it might have helped to have some working sessions with concerned citizens who might be able to listen to and consider each other's perspectives, to help foster understanding and perhaps even some creative thinking and problem solving.

Please continue to support the draft plan position on urban development, and strengthen the plan according to the Friend's of the Gorge recommendations.

Thank you for all of the time and effort you have invested into this process, and for listening to, reading and considering all of the comments you have received.