

TO: Columbia River Gorge Commission

FROM: Jessica Olson, Senior Natural Resources Planner, and Lisa Naas Cook, Vital Sign Indicators Planner, Gorge Commission

DATE: September 13, 2022

SUBJECT: **Information Item*:** Summary of Input Received on the Draft Climate Change Action Plan, May-August 2022

Purpose

This staff report summarizes comments staff received on a draft of the National Scenic Area Climate Change Action Plan during the public comment period from May 5 through August 9, 2022. This staff report focuses on key themes from written comments as well as meetings and work sessions we held with interested parties throughout the comment period. Staff analysis, recommendations, and topics for Commission discussion are included for each comment theme. The original written comments submitted by email are provided as a searchable pdf in Attachment C. We welcome feedback from Commissioners on our approach to addressing comments.

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I. Background

In 2020, the Commission and USDA Forest Service completed its review and revision of the Management Plan that establishes land use and resource protection policies for the Columbia River Gorge National Scenic Area (NSA). Responding to the urgency of climate change and need for action, the two agencies developed a new climate change chapter with General Management Area (GMA) and Special Management Areas (SMA) provisions. At the heart of this chapter is direction to the Gorge Commission to develop and adopt a Climate Change Action Plan and Forest Service to support this effort.

How the Climate Change Action Plan Relates to the NSA Management Plan

The Climate Change Action Plan provides priorities and direction to the Gorge Commission to incorporate climate change adaptation and mitigation into all of our work as an agency. It is a non-regulatory, living document that will be revisited and revised periodically. As illustrated in the graphic below, the National Scenic Area Management Plan, the regulatory document that provides land use policies and guidelines, requires the Climate Change Action Plan, and both plans work together to protect NSA resources in a changing climate. As staff and Commissioners implement the Action Plan, we will develop policy proposals that can be added to the Management Plan during a public revision or amendment process. A few important points to note:

- The Action Plan identifies priority topics for policy development; however, any new regulatory policies will require a public process, concurrence by the Secretary of Agriculture, and dissemination to Gorge counties in order to take effect.
- The Action Plan provides a framework for regional partners to contribute to Gorge-wide climate change goals and identifies the Commission’s policy interests so that landowners, agencies, organizations, and community groups can engage with us early in the process of policy development.
- The Action Plan includes many actions that build and leverage strategic partnerships or improve the ways in which the Gorge Commission and counties implement the existing Management Plan.
- The Action Plan emphasizes incentives to the degree we are able to support these approaches.

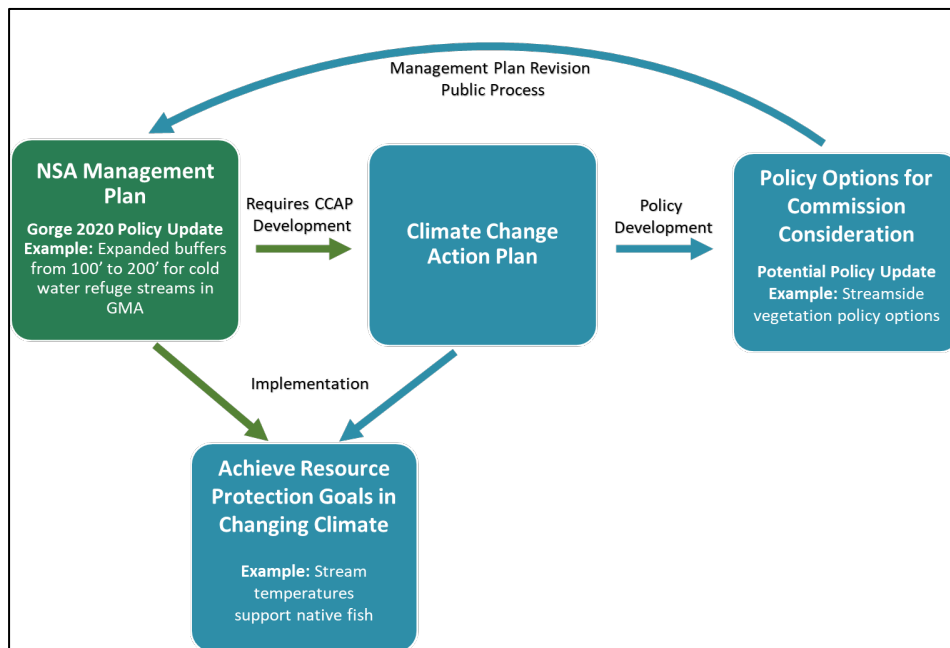


Figure 1. Relationship between the National Scenic Area Management Plan and the Climate Change Action Plan

Consultation and Coordination with Columbia River Treaty Tribes

Our work on the Draft Climate Change Action Plan and related Vital Sign Indicators monitoring program has provided an opportunity for staff to learn more from Tribes about how we can strengthen support for Treaty Rights through these efforts and across all the work we do as an agency. The Columbia River Inter-Tribal Fish Commission (CRITFC) is a vital partner in these efforts as well. The Gorge Commission is committed to growing respectful relationships with each of the four sovereign Columbia River Treaty Tribes, and with individual staff members working on their behalf. We recognize that engaging with each sovereign tribal nation is distinct and separate from any public comment period or specific planning document. A summary of our initial steps to engage more deeply with Tribes on climate change action planning and VSI monitoring is included in [Appendix A](#).

II. Overview of Public Comment Process

Over the past year, Commission staff worked with many agencies, organizations, Counties, Tribes, and others to develop the Draft Climate Change Action Plan released for public comment from May 5 through August 9, 2022. A review committee provided input and technical feedback throughout the process. During the public comment period, staff facilitated four virtual public information sessions, over a dozen presentations and discussions with interested partners and groups in the Gorge, and work sessions with five NSA County Commissions and planning departments. Staff welcomed individuals and organizations to meet with us about any questions, concerns, or suggestions they had. For more details on public information sessions, meetings, and work sessions held during the public comment period, see [Appendix B](#).

III. Key Themes from Comments

During the comment period, the Commission received 33 written comments submitted by email and one Friends of the Columbia Gorge email petition letter signed by 280 individuals. Various agencies, organizations, industries, County Commissions, planning departments, and individuals provided input on the draft Action Plan.

Overall, comments were consistently appreciative of the Commission's commitment to climate change action and supportive of maintaining an agency focus on this work. Specifically, we heard support for the draft Action Plan's emphases on streams and wetlands, First Foods, and equitable climate action. Many expressed interest in local and regional efforts to reduce the risk of large, severe wildfire and to support communities in preparedness and response to fires.

Several voiced concern about the Commission's capacity to implement potential policy changes and emphasized the importance of coordination with partners to understand alignment and to avoid unintended contradictions in plans. Support for a robust public process associated with any proposed policy changes was common across topic areas. The

Commission has requested an additional full time senior level position to be funded by Oregon and Washington to increase capacity to implement the Action Plan.

Below is a summary of key comment themes, staff analysis and recommendations, and topics for Commission discussion where needed.

Policy Implications of the Action Plan

Comment summary: Comments about how the Action Plan influences regulatory policies ranged from support for specific policy development actions to recommendations for incentives and voluntary, rather than regulatory, approaches. Policy topics frequently mentioned include stream and wetland protections and fire risk. We heard strong support for improved policies and implementation approaches to reduce barriers to forest health and fuels reduction work and proactive stream and wetland enhancement projects.

Staff analysis and recommendations:

- Continue to communicate with NSA County staffs and others about the sequence of action planning and future policy changes in the Management Plan [see [Figure 1](#) on page 2].
- The Action Plan identifies several topics for potential policy change including reducing permitting barriers for forest health and fuels reduction work and stream and wetland enhancement projects. Based on comments, interests, and existing opportunities, staff recommends the first policy options to be developed with stakeholder and community input are those that reduce barriers to voluntary forest enhancement projects that reduce fire risk and enhancement projects to benefit streams and wetlands.

Topic for Commission discussion: Do Commissioners support initial priorities to work on alleviating permitting barriers to fire risk reduction (fuels treatments and forest health projects) and water resource enhancements that are consistent with the Management Plan?

Recreation and Visitation

Comment summary: Comments about recreation and visitation urged the Commission to highlight these stressors on other protected resources and communities within the NSA. Some felt the draft Action Plan focused only on the benefits of tourism and needed to acknowledge how increasing visitation compounds the effects of climate change, e.g., high recreation use during dry summer months increases risk of human-caused wildfire. Others expressed concern that the draft Action Plan seemed to favor or emphasize tourism over the needs and interests of local residents.

Staff analysis and recommendations:

- Recreation in the National Scenic Area is a valued resource that our agency protects and enhances through co-management with the USDA Forest Service. The

Management Plan designates locations for recreation uses within the NSA. The draft Action Plan analyzes trends in recreation uses and seasonality based on climate change and the challenges that recreation managers have in maintaining properties and infrastructure under changing conditions (“Recreation resources,” pages 23-24, and “Nature based tourism,” pages 25-26).

- We also recognize that recreation has impacts to other protected resources and that recreation use and overall visitation is increasing across the Gorge. Notably, some of the more climate change sensitive areas and resources, such as those associated with popular water features will likely see higher concentrations of recreation use as temperatures increase. As part of the Vital Sign Indicators program, staff are currently working with USDA Forest Service staff and others to develop an indicator to track visitor use and resource impacts in recreation areas most sensitive to climate change.
- Recreation affects local residents, cultural practices, and businesses including agricultural operations.
- The Action Plan identifies 8 priorities for adaptation and mitigation, based on Commission-approved criteria. While recreation is not among these 8 priority topics in the draft Action Plan, its connection to other adaptation and mitigation priorities is addressed in those sections:
 - Regional transportation, including transit: Addresses the connection between visitation and transportation (pages 35-36) and includes actions to alleviate traffic and congestion at recreation parking areas while promoting transit and parking management (page 57).
 - The Action Plan includes an action to address how increased recreation elevates fire risk (page 62). Staff proposes adding some of these other important points to the narrative sections of the Action Plan and adding specific actions to begin to address this complex and challenging trend.
- Based on comments received, staff recommend adding language to the adaptation section and the actions section to more directly address the compounding impacts of recreation use and climate change on NSA resources through VSI recreation indicators, transportation actions, and options for use restrictions on public lands during high fire risk periods.

Topic for Commission discussion: No specific request from staff, though discussion is welcome.

Agriculture

Comment summary: Commenters expressed concern that the Action Plan draft did not convey enough support for agriculture or acknowledge that agricultural producers are on the front lines of climate change. Some felt strongly that agriculture should not be singled out as a concern above other types of land use change and development. We also heard that

different types of crops need to be treated differently and to be careful not to over generalize what constitutes a best practice.

Staff analysis and recommendations:

- Commission staff hosted a two-part workshop in late 2021 with several agricultural producers in the Gorge. Those meetings highlighted local efforts to enhance soils and practice regenerative and climate-smart agriculture. These are all excellent climate adaptation strategies we fully support. The Commission would like to offer more in the way of incentives to support this work. Staff determined that the best existing opportunity to support these practices is to connect local conservation districts to one another and to landowners, so they can deliver incentives and programs for these voluntary actions.
- The draft Action Plan analyzes climate change impacts to agriculture and farm products (page 26). Agriculture is an enormous opportunity for climate change adaptation and mitigation in the region and beyond. The Gorge Commission, however, is limited in our ability to assist producers with climate adaptation or to provide robust incentives for climate-smart agriculture.
- Staff has made small wording changes to clarify that not all climate-smart agricultural practices are necessarily applicable to every operation or crop type.
- The draft Action Plan did highlight the policy options that the Commission has regarding new proposed agriculture through the existing resource protection provisions in the Management Plan. See the next topic, Oregon white oak woodlands, for further discussion of the proposed updates to the Action Plan that acknowledge the importance of addressing new development more broadly, including new residential uses in farm and forest designations.

Topic for Commission discussion: See topic for Commission discussion for Oregon white oak below.

Oregon White Oak Woodlands

Comment summary: Several commenters responded to the draft Action Plan goal, “By 2030, there is no net loss of oak woodland acres or function in the NSA.” Some voiced support for such an ambitious goal, while others questioned the rationale for this goal in a changing climate that is expected to favor drought tolerant, fire adapted oak relative to other habitat types in the NSA. Several commenters voiced concerns about the implications for future forest health and fuels reduction work and other impacts on property owners. In particular, this specific language from the draft Action Plan, “Consider Management Plan policies, such as limiting new cultivation, to maintain key winter range areas” elicited various concerns about the impact on agricultural producers over time. These main concerns are addressed below.

Staff analysis and recommendations:

- Oak woodlands are a priority habitat protected in the Management Plan as a natural resource. As an agency, within the framework of our existing Management Plan, and in our newer work on climate change, we are required to address the cumulative effects of land use change, conversion from oak woodlands, and fragmentation. These arise from all types of land use and development, including residential, commercial, recreation, fences, and other uses. Staff recommend clarifying priority actions in the revised Action Plan to reflect this broader strategy of addressing oak conversion from the range of developments we see in the Gorge.
- After the draft Action Plan was released for public comment in early May, staff learned from partners about an updated winter range map produced by Oregon Department of Fish and Wildlife and Wasco County that is now being used to implement the existing Management Plan policies to protect deer and elk winter range.
- The original climate change priority topic identified in the draft Action Plan was “Oregon white oak woodlands and winter range for deer and elk.” We have simplified this priority to “Oregon white oak woodlands.” This allows a clearer focus on Oregon white oak habitat, distinct from some of the grasslands in the eastern part of the NSA. We will continue to pursue a strategy to maintain and enhance winter range connectivity within Oregon white oak. Grasslands remain a topic of interest described in the Action Plan and may rise to the level of a priority topic in the future.
- Staff recommend removing the “no net loss” goal language and focusing on the ultimate goal of maintaining and restoring oak habitat quality and connectivity.
- Staff proposes rewording references to new agricultural uses. In the draft Action Plan, we mention that a tool in the policy toolbox we could consider is to limit new cultivation in Oregon white oak priority habitat. We intended this to mean that policies might be more prescriptive in how we work with landowners to adjust the size or intensity of new cultivation based on site-specific conditions. It was not our intention to convey that we would prohibit agriculture on private properties in Agriculture Land Use Designations. The Gorge Commission does have the ability to designate Open Space and thereby restrict new land uses, but that is not yet something the Commission has expressed a desire to do. We are making changes to communicate more clearly that staff intends to develop policy options for the Commission to consider that would be designed to protect sensitive or high value Oregon white oak areas from conversion to new development, including residential uses or uses that require clearing trees.

Topics for Commission discussion: Do Commissioners support staff’s proposed changes to the Oregon white oak priority topic name, goal, and actions described above?

Equity and Inclusive Climate Action Work

Comment summary: Overall, commenters expressed support for the Commission's goal to focus on equity and inclusive community engagement in our climate action work. Several called for greater specificity in our outreach and engagement strategies, actions, and growing partnerships.

Staff analysis and recommendations:

- When we began drafting the Action Plan, the Gorge Commission's diversity, equity, and inclusion (DEI) efforts were in the early stages. We now have greater clarity on some of the strategies and actions we will pursue to ensure more inclusive climate change work and better outcomes for marginalized and historically excluded communities in the Gorge. The revised Action Plan will include a section identifying strategies, specific actions, and key partners who are helping us advance our DEI work around climate change. Staff will be establishing a Pro-Equity Anti-Racism (PEAR) team this fall to provide guidance on the Commission's PEAR Action Plan for the State of Washington, our agency DEI Action Plan, and related equity goals and actions in the Climate Change Action Plan. To support this work, staff has submitted a funding request for translation of key Commission materials and facilitation and interpretation support for community meetings as part of the Oregon and Washington budget proposals for the 2023-2025 biennium.
- Staff has also been working with OSU Extension to pilot a Climate Stewards program in the National Scenic Area. Similar in structure to the Columbia River Gorge Master Naturalist program, this pilot program is intended for community members of diverse backgrounds and all levels of expertise to learn together in the field and classroom, while expanding leadership skills around climate change action. The program will be tailored to the National Scenic Area, focused on the priorities in the Climate Change Action Plan, and designed to provide capstone and volunteer opportunities that help advance Action Plan goals. We have added more information about this pilot program to the Action Plan.

Topic for Commission discussion: Do Commissioners support staff's recommendation to add detail to the final Action Plan about these specific strategies and partnerships for inclusive climate action?

Tribal Treaty Rights

Comment summary:

Staff from individual Treaty Tribes urged the Commission to reflect holistic management approaches in the Action Plan, acknowledging that all native plants and wildlife contribute to healthy lands and waters and are important to Tribal cultures. We heard about the importance of native species and addressing their most pressing threats including invasive species. We were urged to protect fishing sites from increasing non-Tribal uses and

support access to all areas for exercising Treaty Rights undisturbed. We discussed confidentiality of cultural information and different approaches to protect information that is sensitive to Tribes. Herbicide use and environmental toxins are a health concern for Tribal members, particularly when applied to plants that are collected and consumed.

Staff analysis and recommendations:

- Invasive species, including annual grasses and aquatic species, are a concern we highlighted in the draft Action Plan. Through staff conversations with Tribes we have added some specificity to priority actions to monitor and address invasive species. We are continuing conversations with the Forest Service on this topic; the National Scenic Area botanist has extensive relationships with weed management groups in the area, native plant nurseries, and other resources that will help address this topic.
- Implementation improvements are already in progress to help Counties meet the intent of new Management Plan policies for meaningful notice and engagement with Tribes on development reviews. For example, during the August Quarterly Gorge Planners meeting, we communicated advice from the Tribes about how best to alert them to potential concerns around proposed development.

Topic for Commission discussion: Staff invites all discussion around Treaty Rights and staff relationships with each Treaty Tribe.

Vital Sign Indicators (VSI) and Evaluating the Action Plan

Comment summary: Several commenters expressed the need for clarity on the relationship between the Vital Sign Indicators long-term monitoring program and the Climate Change Action Plan. Specifically, they wondered how VSI monitoring data will inform potential policy development for climate action priorities described in the Action Plan.

Staff analysis and recommendations:

- VSI is a long-term, monitoring program designed to assess how well both the Gorge Commission and USDA Forest Service are meeting the resource protection goals of the Management Plan. As we begin implementing VSI in 2023, staff are building a comprehensive land cover/land use map that integrates priority habitats, recreation use, agriculture use, wildfire extent, scenic integrity, and more. This information is part of an on-going, evaluation framework that will be used to inform the next Management Plan review process and can help us fill information gaps and provide continued tracking for specific resources of focus in the Climate Change Action Plan as well, such as cold water refuge streams.
- The draft Action Plan includes a short Part IV about evaluating climate action progress through *activity measures*, focused on specific priority actions in the Action Plan, and *long-term measures of success*, or Vital Sign Indicators, focused on the status and trends of protected resources over time. Staff recommends a revised Part

IV with background information on VSI, explanatory graphics, and updated definitions to better explain the ties between VSI and the Climate Change Action Plan, as well as how staff will track progress on the Action Plan.

Topic for Commission discussion: No specific request from staff, though discussion is welcome.

High Climate Resilient Areas

Comment summary: Comments were generally supportive of the draft Action Plan's overall adaptation priority to protect climate resilient lands. There were questions about the methods and approaches staff used to identify climate resilient lands and to set goals.

Staff analysis and recommendations:

- An overall priority strategy for adaptation in the draft Action Plan is to maintain and enhance climate resilient lands. We added detail and definitions to explain what we mean by "High Climate Resilience Areas," how we identified them, and what approaches can be taken by various partners to ensure that those lands continue to support the changing needs of plants and wildlife.

Topic for commission discussion: No specific request from staff, though discussion is welcome.

IV. Commission Meeting Discussion and Next Steps

Staff appreciates both public comments and Commission discussion of the items identified throughout this staff report as "Topics for Commission Discussion," restated below. Based on public comments, discussion with the Treaty Tribes, and Commission input during the September meeting, we will revise the draft Action Plan and request Commission approval of a revised Climate Change Action Plan at a future Commission meeting this Fall or early Winter.

Topics for Commission discussion:

- Do you support staff recommendations described in this report? Do you have additional specific direction to staff as we address comments that are not described in this staff report?

Next steps

Staff will work to incorporate the revisions discussed during this Commission meeting and provide a recommended Climate Change Action Plan to the Commission in Fall or Winter for a decision to adopt the Action Plan.

The Commission has requested an additional full-time position for the 2023-2025 biennium to support implementation of this Action Plan. The outcome of that funding

request in June 2023 will dictate how quickly we can achieve the priority actions in the Action Plan. For the priority actions that direct staff to bring policy options before the Commission, staff will provide two paths 1) top 3 priorities for policy development that can be achieved with current 0.5 FTE staffing; 2) an additional 3-5 policy development topics that can be achieved if the additional position is funded.

Appendix A: Consultation and Engagement with Columbia River Treaty Tribes

Below is a summary of Commission staff's initial steps to engage more deeply with Tribes on climate change action. This work to learn from each Tribe and become better stewards of the lands and waters they have taken care of since time immemorial is ongoing and important for all aspects of our agency's work. We are grateful for opportunities to discuss and improve this action plan with Tribes and look forward to continuing our climate change action work together over time.

Confederated Bands and Tribes of the Yakama Nation

- Staff from the Gorge Commission and Forest Service met with Yakama Nation cultural resources staff in June 2022.
- Staff from Yakama Nation Fisheries participated in the Climate Change Action Plan Review Committee that met between March 2021–April 2022.

Confederated Tribes of the Warm Springs

- Staff from the Gorge Commission and Forest Service met with Warm Springs cultural resources staff in July 2022.

Confederated Tribes of the Umatilla Indian Reservation

- Staff from the Gorge Commission and Forest Service met with Umatilla cultural resources staff in August 2022.
- Staff from Umatilla participated in the Climate Change Action Plan Review Committee that met between March 2021–April 2022.

Nez Perce Tribe

- Staff from the Gorge Commission is currently coordinating with Nez Perce cultural resources staff and Forest Service staff on a meeting this fall or spring 2023.
- Staff from Nez Perce participated in the Climate Change Action Plan Review Committee that met between March 2021–April 2022.

Appendix B: Public Information Sessions, Presentations, and Work Sessions During the Comment Period

Below is a summary of the public information sessions, presentations, discussions, and work sessions held during the Draft Climate Change Action Plan comment period from May 5–August 9, 2022.

Public information sessions

Staff hosted four virtual public information sessions on May 18 and 19 and June 13 and 16. The purpose was to share how we developed the draft Action Plan and key priorities within it, as well as how to submit comments. Participants were invited to share any initial comments or suggestions.

Invited presentations and discussions with interested partners

- *Friends of the Columbia Gorge:* Staff met with Friends staff in June to discuss Draft Action Plan priorities and different ways for Friends to share member comments with us. Dan Bell, with Friends' Land Trust Program, worked with Gorge Commission staff to discuss the resilient lands section of the action plan and to review a new Appendix in the Action Plan, explaining how we are using The Nature Conservancy's climate resilience data in our work. Denise Lopez, Friends of the Columbia Gorge, met with staff to discuss the draft Action Plan and our diversity, equity, and inclusion work. Denise has helped put us in touch with community leaders and provided feedback on a new Appendix in the Action Plan describing our outreach strategies. Coordination with Friends is ongoing.
- *East Cascades Oak Partnership:* Staff presented at their June meeting and received feedback on oak goals and actions.
- *Historic Columbia River Highway Advisory Committee:* Staff presented at the Committee's June meeting and received feedback on the transportation sections of the draft Action Plan as well as opportunities to partner in implementing the goals and strategies in the plan.
- *Washington Department of Fish and Wildlife:* Met with Amber Johnson to discuss questions and areas of interest she would be sharing in a written letter. Topics included streams and oak woodlands.
- *Oregon Department of Fish and Wildlife:* Jeremy Thompson provided a track changes copy of the vulnerability snapshots for Oregon white oak and for deer and elk winter range. Staff incorporated those suggestions into the text.
- *Yakama Nation Fisheries:* Jeanette Burkhart provided technical resources and discussed the growing body of work to restore the ecological benefits of native beavers in the state of Washington. Staff incorporated some minor additions to the

Action Plan and will continue learning about these opportunities as they relate to our priorities for cold water refuge streams, wetlands, Tribal Treaty Rights, and fire risk.

- *Interagency Recreation Team* (network of Gorge recreation managers): Staff discussed several elements of the Action Plan during the Team's July meeting. Comments relating to electric vehicle infrastructure, recreation use and management, transit and transportation, and protecting sensitive areas from growing recreation pressure were considered in revising the draft.
- *US Fish and Wildlife Service*: Staff met with Mike Hudson, Kaitlyn Landfield, and Cheri Anderson, to discuss priorities for climate change action and identified several topics to work on together in the future. Staff made two additions to priority actions for overall adaptation and Tribal Treaty Rights based on their input.
- *Hood River Forest Collaborative*: Staff presented at the Collaborative's May meeting and discussed priorities for forests, fire risk, and streams.
- *Environmental Protection Agency*: John Palmer provided feedback on goals for Cold Water Refuge Streams and Riparian Habitat in the draft Action Plan.
- *Columbia Gorge Climate Action Network*: Staff presented at the Network's June meeting and discussed several topics including High Climate Resilience Areas, fire risk, and electric vehicles. Following this meeting, we have been in touch with one CGCAN member, Mike Hendricks, who offered to provide suggestions related to monitoring and progress-checking for the Action Plan.
- *Rivian* (electric vehicle and charging company): Shannon Walker provided initial feedback on the E-V infrastructure section of the Action Plan and shared some pilot projects underway that directly contribute to our goals.

Coordination with NSA counties

Staff provided information on the Draft Climate Change Action Plan and public comment period to planners from NSA counties during the May 17th Quarterly Planners Meeting. These are regular meetings with planning department staffs from the National Scenic Area Counties and a venue for on-going coordination on the Action Plan and other initiatives.

Staff also coordinated separate work sessions with County Commissions and planning departments:

- *Wasco County Planning Department*: Kelly Howsley-Glover, Wasco County Planning, met with us on two occasions and exchanged several follow up emails. In the first meeting, we discussed the contents of her original comment letter. Then we scheduled a meeting with several agriculture interests, Department of Land Conservation and Development (DLCD), Hood River County, and Oregon

Department of Fish and Wildlife to discuss the draft action plan language around Oregon white oak and deer and elk winter range. These discussions and subsequent emails led to several revisions to the draft Action Plan.

- *Klickitat County Commission*: Commission staff presented and heard feedback from the Klickitat County Commission on June 14th.
- *Skamania County Commission*: Commission staff presented and heard feedback from the Skamania County Commission on June 7th and June 28th.
- *Multnomah County Commission*: Commission staff presented and heard feedback from the Multnomah County Commission on July 14th.
- *Hood River County Commission*: Commission staff presented and heard feedback from the Hood River County Commission on July 18th.
- *Wasco County Commission*: Commission staff presented and heard feedback from the Wasco County Commission on August 3rd.

Columbia River Gorge Commission

Draft Climate Change Action Plan

Public Comments

Rick Petersen - 05.05.2022.1
Eric Walker, Hood River County Community Development - 05.17.20222
Janet Wainwright - 05.24.2022.3
Gabrielle Geller - 06.03.2022.6
Kelly Howsley Glover, Wasco County Planning Director - 06.13.2022.7
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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

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

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

County Community Development Director
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(541) 387-6840 – Phone
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eric.walker@hoodrivercounty.gov

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

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

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

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)

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; Hower, 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 part.

Kelly Howsley Glover
Wasco County Planning Director

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Oregon Department of Forestry Climate Change and Carbon Plan (2021)
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From: [Lotus Boyanton](#)
To: [Climate Action](#)
Date: Thursday, June 16, 2022 10:32:32 AM

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!!!

--

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
3300 Vensel Rd.
Mosier, Oregon 97040
Sdooley3300@yahoo.com

From: [Sally Newell](#)
To: [Climate Action](#)
Subject: Enforcement
Date: Friday, July 8, 2022 12:13:16 PM

Yes, this is a comment on your draft climate action plan. Here is my comment:

I served on the commission from 1990 to 94, was a reporter prior to that, attending almost every single meeting during the development of the Management Plan for the Columbia River Gorge National Scenic Area. I have a more than passing interest in and knowledge of the scenic act. I live in the GMA, in Underwood.

The scenic act is very specific in its charge to the commission. Your job is to protect the scenic, natural, cultural and recreation resources of the Columbia River Gorge.

Given the rising popularity of my lifelong home, I am thrilled that the scenic act exists, and commend each of you for serving. The “snickers,” are important to protect, and I understand how the warming planet threatens them.

BUT, this is not a problem that the commission can fix. It is not within the scope of your charge as described in the scenic act.

Violations of the management plan are rampant throughout the scenic area, and that IS your responsibility. Reliance on “complaint-based enforcement,” as administered by the counties is a clear failure. You have at least one county where new structures are noted and taxed by the assessor, but planning turns a blind eye, absent a complaint. Complaints are scarce, because they are part of the public record. That means the violator can identify and retaliate against the complainant.

Landowners with a property large enough to hide new structures or large-scale earthmoving activities (some enormous, in my neighborhood) are all smiles. Violations clearly visible from public roadways are not corrected. I guess that is equal protection under the law.

My point is, your core mission is being ignored, while you spend precious staff time on a world-wide problem over which you have very little influence. Shame on you.

Sally Newell
142 Dona Rd.
PO Box 186
Underwood, WA 98651
(509)493-3624

Sent from my iPhone

From: [Jean M. Avery](#)
To: [Climate Action](#)
Subject: Public Comment on Climate Action Plan
Date: Sunday, July 10, 2022 6:03:08 PM

To: Gorge Commission

Thank you for developing a thorough Climate Action Plan to address climate impacts in the beautiful National Scenic Area (NSA).

I am impressed with your clearly presented, four-fold approach:

- the NSA's vulnerable / adaptive resources (described with an effective grid)
- mitigation options
- specific actions, in 2022-2025 and beyond
- a mechanism to track outcomes.

I am absolutely thrilled to learn about the public transit options. I've already used the Gorge Express bus several times -- and am telling all my friends about this convenient service. (Special thanks to C.A.T. and to Friends of the Gorge for spreading the word.)

As a hiker, I wonder if it's possible to have a low-cost transit option through the waterfall corridor? This way, folks could have access to more trailheads.

Thank you for your work and for accepting public comments.

Sincerely,
Jean M. Avery
Vancouver, WA resident

From: [Janet Weil](#)
To: [Climate Action](#)
Subject: comment on your Climate Change Action Plan
Date: Wednesday, July 20, 2022 6:52:46 PM

I read your Action Plan with interest and appreciation.

However, I am concerned that this plan says nothing about the risk of derailment, explosion and fire from oil trains running to the Zenith Energy transshipment facility. As I'm sure you know, Mosier, Oregon experienced a severe and potentially life-threatening event in 2016 when one of these trains derailed, because bolts supposedly fastening the rails were not attached. Rail track defects are the second most common (after human error) reason for railway accidents. The oil trains going to Zenith carry shale oil from the Bakken fields, a highly inflammable and toxic fuel. They used to carry even more toxic diluted bitumen, but my understanding is that that has been suspended (hope so). Another such derailment could cause a massive fire, spill oil into the river, kill people, or all of the above. There's a reason they are called "bomb trains."

In addition, the Zenith facility very close to the Willamette River poses a grave threat to that river, and thus to the lower Columbia, in case of a major earthquake.

I recommend that your final Action Plan include information about the threats of rail accidents to the beautiful, unique Columbia Gorge, and how those threats can be minimized or eliminated altogether.

Thanks for your consideration, and for your much-needed work,
Janet Weil
Portland, OR

From: [Garlynn Woodson](#)
To: [Climate Action](#)
Subject: comments on the Draft Climate Change Plan
Date: Wednesday, July 20, 2022 5:56:08 PM

Dear Gorge Commission,

Please find below my comments on the Draft Climate Change Plan.

Riparian areas:

To support migration, all tributaries to the Columbia need to be seamlessly connected to the river from their upland environments. Where these connections are currently impaired by freeway and railroad bridges, berms, and related infrastructure, that infrastructure must be retrofitted to ensure that not just aquatic, but also land based species, including humans, are unimpaired and able to freely move from the river bank to the uplands along riparian corridors.

As a part of this effort, additional stream side plantings can be completed to increase shade on water and adjacent habitat.

This work should be substantially complete by 2030.

Tribal

The dams on the main stem of the river should be removed. The most important of all first foods is salmon; salmon restoration in the river is held back by the dams. Removal of the dams and restoration of salmon runs must be job one. This includes creating new renewable energy sources to replace the dams, including solar and wind, as well as, potentially, micro-hydro and pumped hydro for storage.

Tribes should be given the housing that they were promised when the dams were installed, to replace their villages that were flooded.

The ability to walk from the river to the uplands, and from one end of the gorge to the other, unimpeded by physical or legal barriers, should be restored by 2030. This may mean establishing new trails and rights of way, and modifying existing infrastructure. This is critically important work.

Oak woodlands and elk

Barriers to elk migration, from the river to the mountains, and from one end of the Gorge to the other, must be removed to restore the free movement of elk within the Gorge. Additionally, elk hunting must be banned statewide in both Oregon and Washington to ensure that elk populations are able to return to their historic levels, otherwise migratory Elk will be hunted and killed when they venture outside the Gorge.

Regional Transport and GHG mitigation

Rail service must be electrified through the Gorge.

Electric inter-city rail passenger service must be re-established, with regular stops at Multnomah Falls, in Cascade Locks, Hood River, and the Dalles.

Seamless, car-free bicycle and pedestrian trails must be established to connect Portland to Hood River without the need to share a road with cars, which dramatically increases stress and reduces ridership.

The trail system needs to connect the river to the mountains, and the east to the west, through the Gorge to allow for through-hikers to access the Gorge without a car.

Carbon Storage

Ban clear cutting on all lands adjacent to the Gorge, to begin with.

Then, figure out what resilient forest management for carbon sequestration looks like, including any needs such as the double-usage of pumped hydro infrastructure for ridge-top fire-fighting to protect carbon stocks in canyon forests.

The bottom line is, the Gorge Commission must act with the sense of urgency demanded by our times. The UN tells us that the time for action is immediately:

<https://www.cnbc.com/2022/07/18/guterres-warns-against-climate-suicide-as-heat-wave-grips-europe.html>

From: [Callahan, Jason](#)
To: [Climate Action](#)
Subject: Climate plan comments from Green Diamond
Date: Thursday, July 21, 2022 12:16:26 PM
Attachments: [image001.png](#)
[Gorge commission climate plan comment letter - Green Diamond.pdf](#)

Hello.

Please accept this comment letter to the Commission's climate plan.

Thank you!

Jason Callahan
Policy and Communications Manager
215 N Third Street, Shelton, WA 98584
O: 360-427-4733 | C: 253-569-0942
Jason.Callahan@greendiamond.com / www.greendiamond.com



Columbia Basin Timberlands

PO Box 268
Bingen, Washington 98605
www.greendiamond.com

Columbia River Gorge Commission
57 NE Wauna Avenue
White Salmon, WA 98672
Via: ClimateAction@gorgecommission.org

July 21, 2022

Re: Public comment from Green Diamond on draft Climate Change Action Plan

Thank you for accepting public comments on the draft Columbia River Gorge National Scenic Area Climate Change Action Plan. Green Diamond Management Company submits these comments on behalf of Twin Creeks Timber, LLC, a relatively new owner of working forests within the National Scenic Area (NSA). Twin Creeks owns approximately 90,000 acres in Klickitat, Skamania, Hood River, and Wasco counties, which are managed by Green Diamond.

Although Green Diamond is new to management in the NSA, we have a long history in the Pacific Northwest. Green Diamond is a family-owned company in its fifth generation. Initially founded in Mason County (WA) in 1890, Green Diamond also manages, in addition to the land in the NSA, approximately 600,000 acres of forest land in southern Oregon and 300,000 acres across the base of the Olympic Peninsula in Washington. The company also has a presence in Montana, California, and six southeastern states.

Green Diamond, as a company, takes climate resiliency and adaptation seriously and applauds the Commission for its forward-facing approach to the issue. We believe that forest landowners have a role to play in today's carbon challenge and, as a collective industry, have found opportunities to move the needle when it comes to viewing working forests as a natural climate solution. For instance, our company is actively involved in carbon markets in both southern Oregon and on land it manages in northwestern Montana. In addition, all Green Diamond lands nationally (over ten states) are certified as sustainable under one of the two leading third party certification bodies. This includes the land we now manage in Skamania and Klickitat counties which was just successfully audited last month to the Sustainable Forestry Initiative (SFI) standards. This is the first time this land has ever been audited and certified as sustainable by a recognized third party. Worth noting is that the new SFI standards for 2022 include certification requirements for climate-smart forestry. We are proud that the lands we manage nationally, including in the NSA, achieved this level of certification.

Engagement for forest landowners on carbon issues often boils down to opportunities and risks. Carbon planning can create both for a landowner, which should generally be seen as good news. The plan put forth by the Commission creates mutual opportunities for landowners to partner with the Commission on reaching its goals. It does, however, raise the specter of some risk. Our ask of the Commission is to focus its energies where those partnership opportunities exist. The risks in the plan are not just risks to landowners, but to the achievement of the overall objectives laid out in the plan.

One of the risks created in this plan is the possible creation of unintentional mutually exclusive objectives. The plan, on pages 39 and 59, speaks of the value of protecting working and natural

lands from conversion to other uses. At just under half of the nation's forest land base, private working forests tell a remarkable carbon story. They provide 90% of domestic timber harvests, while also providing 80% of our nation's annual net carbon sequestration and nearly 50% of our long-term carbon storage. To put this in context, working forests annually sequester more carbon than is emitted by all U.S. passenger vehicles each year.

The plan cites studies that show U.S. forests, today, are a net sink that already sequesters 14% of US carbon emissions. In Washington, *private working forests* alone sequester 12% of the state's emissions even after figuring in the emissions associated with harvest, transportation, and processingⁱ. These are laudable results and critical to consider when planning for climate outcomes. The loss of working forestlands to any other land use will take us further away from the objectives of plan. Strategy 1 of the goals for carbon storage seems to incorporate that idea.

As such, we support the elements of the plan that recognize the negative outcomes from the loss of forestland to other land uses. There is mutual opportunity in the NSA for both the Commission and landowners of all types to partner in this area. That said, other parts of the plan create some risk, for both the Commission and landowners, in achieving this objective.

The most effective way for the Commission to avoid the loss of forestland, and maintain its sequestering ability, is simply to support the existing working forestland base. The ability to operate successfully is the most significant factor to keeping forests on the landscape and sequestering carbon. This requires not only support of the work of foresters and forest land managers, but also support of other needs that are required to operate a successful forestry operation. These include support for the harvesting, transportation, and processing of forest products. Those are the elements essential in both keeping landowners on the land and to create the long-term, off-forest storage needed for the carbon sequestered in the trees.

This is where the risks in the plan, and potentially conflicting objectives, come into the picture. Other parts of the plan speak to improved forest practice techniques (page 27), improvements to carbon storage on private forestlands (ex sum page 11; page 59), and increased stream buffers (page 49). As applied to non-federal forestlands, most of these elements are addressed in the forest practices rules of the applicable states. On the Washington side, and hopefully soon on the Oregon side, they are also part of a federally approved habitat conservation plan. We would prefer to see these objectives more narrowly tailored to areas and land uses within the authority of the commission so as to not create unachievable expectations.

These elements, if not executed correctly, could have the adverse result of undermining the viability of commercial forestry. This would increase forest conversion within the NSA and reduce its overall carbon sequestration potential. The key to avoiding those outcomes is to ensure that all plan implementation efforts are done in coordination and concert with landowners and consistent with the applicable forest practice rules in the appropriate jurisdiction. The objectives themselves have merit, but like so many things, success will be fully contingent on how they are implemented.

Another area where implementation risks could arise is with fire. As a forest landowner and manager, we are obviously concerned about wildfire. Wildfire spreading onto working forest land from neighboring lands is a real threat, one that was highlighted in southern Oregon where we saw 110,000 of our acres burned during the Bootleg fire of 2021. We are supportive of the plan's objectives that seek to lower wildfire risk and advocate for an all-lands approach to the issue. Wildfire risk reduction is similar to carbon sequestration in that the best results will be come from coordination and cooperation with landowners. We would like to work with the

Commission as it implements plans to reduce permitting barriers to thinning and other forest resilience treatments. We would also like to volunteer ourselves as partners in your efforts under Strategy 1 to seek grant funding for small forest landowners and Strategy 2 to build community support for forest management.

One question raised by the fire risk objective revolves around strategy 1 and the seemingly exclusive focus on risk reduction on private lands. We feel that an all-lands approach is necessary and focusing only on private lands is too limiting. The plan mentions the Eagle Creek fire as precedence for action; however, that fire was started on US Forest Service land. Likewise, the Bootleg fire that devastated our southern Oregon lands also ignited on public land. We recommend extending this strategy beyond just private lands and, if one land type is deemed required for focus, shifting that strategy to public lands. Nearly 28 percent of the NSA is owned by the U.S. Forest Service, and they represent just one of the public forest landowners in the NSA. Much of the fire risk, and opportunity for improvement, can be centered on public ownerships. A limited focus on private lands could miss these opportunities.

If the Commission opts to maintain the focus on private lands, then more focus on which types of private land would be helpful. Again, we are hoping to be partners in these efforts, but do worry that casting such a broad net on all private lands could mislead efforts away from targeting the appropriate focus areas.

Green Diamond and Twin Creeks are new to the NSA and we look forward to building a partnership with the Commission and the other members of the community. Elements of the Climate Change Action Plan have merit in helping the NSA remain resilient in the face of a changing climate; however, they will be most powerful when done in coordination with area land managers and consistent with their management objectives. We look forward to those opportunities.

Thank you,

Brian Sayler
Vice-President and General Manager; Northwest Timberlands

ⁱ Ganguly I, Pierobon F, Sonne Hall E. Global Warming Mitigating Role of Wood Products from Washington State's Private Forests. *Forests*. 2020; 11(2):194. <https://doi.org/10.3390/f11020194>



July 29, 2022

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

Dear Gorge Commissioners and Director Wolniakowski,

The Wasco County Economic Development Commission is writing to submit comments on the Gorge Commission's DRAFT Climate Change Action Plan. With our perspective focused on economic development in Wasco County, we offer these comments on the draft plan:

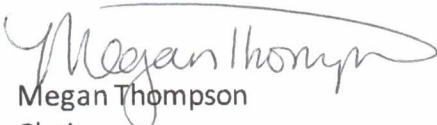
- **Working Landscape Impacts:** While this plan focuses on recreation and tourism as primary economic drivers in the NSA, significant economic activity occurs through agriculture and forestry within the NSA. Recommendations that negatively affect these working landscapes will drastically impact the regional economy and the communities that live in the NSA. Concerns impacting these uses include:
 - Development in the National Scenic Area is already very difficult, with the first purpose often restraining the second purpose. Do not create additional barriers to new development, or successful operation of existing industry activity in agricultural cultivation and forestry operations with policy recommendations in the CCAP.
 - While we appreciate opportunities to increase the mobility of people and goods within the region, we encourage consideration of impacts of different trail and recreation investments on working landscapes and their ability to continue operations into the future.
 - We prefer language that makes desired actions voluntary, or supported with compensatory incentives. We do not support creating new requirements or involuntary limits, such as on new cultivation (pg 55 of the plan) or building size (pg 66 of the plan, contemplated for the future).
- **Infrastructure:** Infrastructure investments are vital to the Wasco County economy and can positively impact climate change.
 - With exploration of agricultural use of electric vehicles, we would encourage allowing broader opportunity for energy generation and vehicle charging in the rural landscapes rather than a focus on recreation needs.
 - Additionally, ensuring our utility providers are able to upgrade their infrastructure without overly cumbersome permitting processes will support additional EV adoption, create more climate resilient communities via infrastructure hardening, and reduce the need for commutes as increased broadband connectivity allows for remote work in our rural areas.

- **Private Ownership:** Several references are made to protecting “climate resilient lands” via shifting property to public entities or land trusts. In Wasco County, our agricultural producers and other landowners have a strong track record of conservation and adoption of new measures to support resource protections. The EDC encourages you to work with local partners like the soil and water conservation districts and other subject matter experts to identify strategies (compensatory and incentive based) that support private land owners in creating climate resilient landscapes rather than focusing on shifting ownership models as a primary strategy. Private ownership continues to support productive landscapes, the local economy, and a tax base able to provide services that are critical for our County.
- **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 is clearly identified and can be understood to ensure for a clear process by which jurisdictions may request a UGA expansion.

We encourage the Commissioners to keep close focus on the actions you can control through a land use process, avoid any overreach of authority, and leverage local, regional, state, and federal agency expertise to develop evidence based strategies that balance the economic vitality of the region with the resources outlined in the Act to support increased resiliency in the County and the region.

Thank you for accepting these comments.

Sincerely,


Megan Thompson
Chair



P.O. Box 1966
Vancouver, WA 98668-1966 July 30, 2022

Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98672

submitted via email

Dear Commissioners:

The Vancouver Audubon Society congratulates the Gorge Commission and staff for the development of a Climate Change Action Plan that seeks to protect sensitive National Scenic Area resources and to reduce greenhouse gas emissions.

We have been engaged in climate change action planning at the local level in Vancouver, where the City Council is poised to adopt one of the most progressive city climate action plans in the nation as well as a ban on new or expanded fossil fuel facilities. We are pleased to see climate action work expanding to the regional level in the Columbia River Gorge.

We offer the following recommendation to build climate resilience in the Columbia River Gorge National Scenic Area:

1. Equity and Inclusion

Just as we have focused on ensuring climate actions do not unduly impact overburdened and frontline communities in our city, we hope to see similar efforts in the Columbia River Gorge.

- Prioritize the protection of culturally important plants.
- Protect tribal treaty rights from the impacts of climate change.
- Create or support resources for frontline communities that experience the first and worst consequences of climate change.

2. High Climate Resilience Areas outside the Urban Areas

We support the inclusion of high climate resilience areas in the Climate Change Action Plan. Given the accelerating impacts of climate change coupled with rapid land development and conversion, we urge the Gorge Commission and the U.S. Forest Service to embrace permanent protection and identify land acquisition as critical strategies in the protection of High Climate Resilience Areas.

3. Streams and Wetlands

We support increasing protective buffers around salmonid-bearing streams and wetlands and accelerating wetland and stream restoration projects.

4. Sequester Carbon in Trees

We already have seen that climate-stressed trees are unable to defend themselves as well against native and non-native pests and diseases and are at higher risk of wildfires. We support protecting forests by preventing industrial scale clear-cutting, which releases massive amounts of sequestered carbon into the atmosphere. Improper forest management contributes up to 17% of global carbon emissions. Forests are considered a crucial element of the carbon cycle and they play a vital role in regulating, mitigating, and adapting climate change impacts. Thousands of acres of forest in the Columbia River Gorge are managed as industrial forest lands – even the most highly protected and sensitive lands. The Climate Change Action Plan should address reduced forest cover due to logging practices. It should make amendments to the Management Plan to limit clearcuts on sensitive lands while adopting some climate smart forestry strategies to deal with reducing greenhouse gas emissions and also ensuring adaptive forest management for resiliency and a sustainable supply of forest-based good and services.

5. Protect Agricultural Lands

- New non-farm development should be prohibited on lands suitable for agriculture.
- Restrict new residential development in Small Woodland zones.

6. Promote regional transportation to reduce greenhouse gas emissions

We support efforts to create a regional transportation authority to develop a Gorge-wide transit plan that provides affordable and convenient regional transportation options.

7. Prohibit new or expanded fossil fuel facilities

Vancouver is on the verge of adopting an ordinance to prohibit new or expanded fossil fuel facilities in the city. We support the expansion of this prohibition through the Columbia River Gorge. Reliable and cost-effective technologies exist to reduce the carbon intensity of existing and new buildings through electrification. Around our region, communities are adopting policies to transition new construction to all-electric and ambitious targets to decarbonize existing buildings. Even the expansion of natural gas transmission and distribution facilities should be prohibited.

Thank you for considering our comments. We appreciate your work in developing a climate action plan with meaningful actions that increases climate resilience in the Gorge.

Sincerely,



Susan Saul
Conservation Chair

From: [David Berger](#)
To: [Climate Action](#)
Subject: Draft Climate Action plan
Date: Sunday, July 31, 2022 4:47:13 PM

Dear Gorge Commission,

Please work with Klickitat PUD for a true net metering (\$ for \$) for individual renewable energy producers. They abandoned this concept a couple of years ago. Also, other counties need to have true net metering if they do not at present.

Also, support grants for mixing systems (like the one in Taylor Lake, Or) for lakes that mitigate HABs.

Thanks, David

From: [Debi Ferrer](#)
To: [Climate Action](#)
Subject: Public Comments
Date: Wednesday, August 3, 2022 12:29:25 PM

Dear Commissioners and Staff,

My comments are in response to a proposed letter by Wasco County with comments for the CRGC CCAP. It was a part of the Wasco County board packet for the 8-3-22 BOCC meeting. It may be that this letter is not actually submitted to the CRGC (there was some disagreement among the commissioners), but it came up today following the fabulous presentation by CRGC staff about the Draft CCAP and I just want the CRGC to know that the proposed letter does NOT represent my view, as a resident of Wasco County for almost 50 years, and I suspect it does not represent the views of many other residents.

First, the proposed letter urges the CRGC to put off adoption of the CCAP to allow for yet more review. The Draft CCAP plan has undergone a very robust public review process already for many months, a process in which agency experts as well as concerned citizens such as myself have had ample opportunity to submit suggestions. I read the previous draft, and the current draft carefully. I've attended presentations about both drafts. Many positive changes were made in the current draft in response to public comment on the previous draft, an indication of the Commission's responsiveness to concerns. I expect that the final CCAP will further incorporate appropriate suggestions made during this additional public comment period. **Delay is not necessary.**

Second, the proposed letter from Wasco County also referenced "policies that will have far-reaching impacts" as a further rationale for postponing adoption of the CCAP. However, climate change will have even greater impacts as we are witnessing right now with extreme

summer temperatures and wildfires. The CRGC has made it clear in the CCAP and at presentations like the one they gave today that any future policy changes resulting from actions in the Plan will be subject to additional public comment process. Based on the rationale in the proposed letter, **delay is not necessary.**

Finally, thank you for the leadership the CRGC has shown in taking action on climate change in the Gorge! I look forward to following your progress.

Deborah Ferrer
The Dalles, OR



Hood River County Community Development

Planning, Building Codes, Code Compliance & GIS

601 State Street, Hood River OR 97031

ERIC WALKER, DIRECTOR
(541) 387-6840 • plan.dept@co.hood-river.or.us

LETTER SENT VIA EMAIL

August 4, 2022

Columbia River Gorge Commission
c/o Robin Grimwade, Chair
P.O. Box 730
White Salmon, WA 98672

RE: Draft Climate Change Action Plan for the Columbia River Gorge National Scenic Area

Dear Mr. Chair and Commissioners:

Thank you for the opportunity to provide comments on the Gorge Commission's Draft Climate Change Action Plan (CCAP). Also, thanks to your staff, especially Lisa Naas Cook and Jessica Olson, who provided a thorough presentation to our Board of Commissioners on July 18, which was well received. As part of their meeting, the Board of Commissioners reviewed the following comments and expressed their general support:

- Hood River County staff recognizes the importance of proactively evaluating potential impacts to Gorge resources and communities resulting from greenhouse gas emissions.
- Although supportive of most of the broad concepts proposed as part of the draft CCAP, concerns remain about future regulations resulting from the policies developed.
- Instead of adopting new regulations to implement the policies included in the draft CCAP, the Gorge Commission should primarily focus on incentives to encourage landowners and others to implement final CCAP priorities. An incentive worth considering may include eliminating or reducing land use review requirements for certain development activities that support the CCAP, such as those involving non-commercial renewable energy projects, new EV charging stations, and resource enhancement projects.
- If future regulations are deemed necessary to implement CCAP policies, the Gorge Commission should design them to be clear and easy to understand and implement, while not being overly burdensome on affected property owners and prospective applicants. Hood River County remains interested in seeing meaningful changes to existing and future requirements of the Management Plan that will allow for clearer and more efficient implementation of the Management Plan, while continuing to protect valued resources and support the economy of Gorge communities.
- Aspects of the CCAP that Hood River County would likely be hesitant to support would include additional limitations to harvest timber (related to carbon storage) and new cultivation activities (related to winter range

habitat¹). Hood River County would, however, likely support CCAP concepts that would promote forest restoration work and activities to reduce catastrophic wildfires, such as reducing forest fuels.

- The Board also reviewed Wasco County Planning Director, Kelly Howsley Glover’s letter to the Gorge Commission, dated June 13, 2022, and expressed generally supported of her comments.

Thank you for your time and consideration.

Sincerely,



Eric Walker, Director

Hood River County Community Development

- cc: Michael Mills, Hood River County Appointee, Gorge Commission (via email)
Krystyna Wolniakowski, Executive Director, Gorge Commission (via email)
Mike Oates, Chairman, Hood River County Board of Commissioners (via email)
Jeff Hecksel, Administrator, Hood River County (via email)

¹ Hood River County Planning staff appreciated Gorge Commission staff participating in a CCAP discussion hosted by Wasco County Planning Department on July 28, 2022, concerning their initial policy recommendations to limit new cultivation in wintering range areas containing Oregon white oak habitat. This meeting was also attended by representatives from the Oregon Department of Agriculture, Oregon Farm Bureau, and ODFW, as well as two local orchardists. As part of this discussion, Gorge Commission staff acknowledged that additional clarification to the draft CCAP was warranted to address some of the concerns raised, which included focusing less on impacts to winter range habitat from cultivation and more on Oregon white oak removal caused by other development activities, incentivizing key oak habitat preservation through conservation easements and other means, protecting agricultural activities on lands zoned specifically for agriculture use, and clarifying that a full prohibition on new cultivation was not intended as part of the draft CCAP.



Oregon

Kate Brown, Governor

Department of Land Conservation and Development

Community Services Division

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: 503-373-0050

Fax: 503-378-5518

www.oregon.gov/LCD



August 4, 2022

Robin Grimwade, Chair
Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98672
(Provided by email to: ClimateAction@gorgecommission.org)

Subject: Climate Change Action Plan Comments

Greetings Chair Grimwade, Commissioners and Staff:

Congratulations on your advancement of a draft Climate Change Action Plan for the Columbia River Gorge National Scenic Area. We commend your efforts in this important and imperative work and appreciate the opportunity to provide feedback in the spirit of coordination and efficiency for our local land use partners and residents.

Because both of our agencies plan for climate change, wildfire, and equity in land use, three counties and their six incorporated and unincorporated communities will require clear direction from both of us to ensure applicable plans can be implemented successfully and without undue burden. It is exceptionally beneficial that we coordinate goals, data sources, and partnership opportunities where possible.

Several Oregon plans related to climate change are noted in the draft report's list of "Other Climate Change Plans for the Gorge Region" but we have not yet had the opportunity to discuss them collectively or verify any unintended conflicts. DLCD Regional Representative Angie Brewer and the Commission's Director Wolniakowski have discussed the idea of a cross training our resource specialists to better understand and coordinate the parallel efforts of our agencies. The invitation was extended to us recently and we look forward to pursuing it in the very near future.

We appreciate that this document is currently non-regulatory but would note that several action items propose regulatory changes to be achieved no later than 2025. That said, we have had the opportunity to review the draft report and would like to share the following feedback:

- **Agriculture & Wildlife:** We see that you held public engagement in November of 2021 about the impacts of climate change on Agriculture; it is not clear whether wildlife needs were discussed with this audience. The draft report contains strategies that point to additional wildlife protection in areas currently zoned for cultivation, including a possible prohibition of new cultivation in deer winter range and oak woodland habitat. Existing Scenic Area policies are more restrictive than state law, but we'd like to call out a possible unintended impact to existing farm practices. As defined in the Management Plan, new cultivation includes soil that has not been turned for five years. Many crops, including orchards and vineyards, do not require regular disturbance and are currently mapped as winter range. As such, for example, removing and replanting trees in an existing commercial orchard may conflict with this proposed rule. Report data sources point largely to the Forest Service, East Cascades Oak Partnership, and other non-

government sources. While valued partners, it is not clear how much coordination has occurred with Oregon Department of Fish and Wildlife, Oregon Department of Agriculture, conservation districts who work with area farms to implement wildlife protections, or regional agriculture organizations (e.g., Oregon Cherry Growers, Oregon Wheat, Cattleman's Association, etc.). We do not see them listed in your project partners; if these connections have not been made, we strongly encourage you to seek them out. If we have missed them in your report, thank you for making them.

- Recreation: The Columbia River Gorge is currently marketed internationally, nationally, and regionally as a destination for recreation, drawing millions of visitors every year. We are in agreement with your goals to reduce greenhouse gas emissions related to the transportation needs of this use. Recreation should also be evaluated for wildfire risk, especially since it has been identified in the draft plan as the predominant use permitted in Gorge forests.
- Wildfire: Oregon's SB 762 Wildfire Adapted Communities work is still underway at DLCD, with draft recommendations due to the legislature by the end of this year. We would invite coordination on this topic wherever feasible in your process, particularly because Oregon's building and fire codes will apply in the Scenic Area even if the land use regulations do not – and could impact building material choices and defensible space requirements for new development within the Scenic Area.

We recognize the Gorge Commission's authority to differentiate from state law, but strongly encourage cohesive state agency coordination where possible to ensure our collective plans can be embraced fully, and successfully implemented to address the goals of this plan and others moving forward.

Thank you again for the opportunity to comment.

Sincerely,



Brenda Ortigoza Bateman, PhD
Director

Cc: Krystyna Wolniakowski, Columbia River Gorge Commission Executive Director
Kirstin Greene, DLCD Deputy Director
Gordon Howard, DLCD Community Services Division Manager
Kelly Reid, DLCD Regional Representative serving Multnomah County
Angie Brewer, DLCD Regional Representative serving Hood River and Wasco County
Christine Shirley, DLCD Climate Change Resilience Coordinator
Susan Millhauser, DLCD Natural Hazards Planner - Wildfire
Hilary Foote, DLCD Farm & Forest Resource Specialist
Jim Johnson, ODA Land Use and Water Planning Coordinator
Joy Vaughn, ODFW Land Use and Waterway Alterations Coordinator
Carol Johnson, Multnomah County Community Development
Erik Walker, Hood River County Community Development
Kelly Howsley Glover, Wasco County Planning Department
Gordon Zimmerman, Cascade Locks

Dustin Nilsen, Hood River Planning Director
Katie Skakel, Mosier City Planner
Josh Chandler, The Dalles Interim Planning Director



August 5, 2022

Dear Director Wolniakowski and Gorge Commissioners,

Mid-Columbia Economic Development District (MCEDD) is pleased for the opportunity to submit comments on the Gorge Commission's Climate Change Action Plan. We applaud the Commission for its leadership related to climate change and acknowledge the work that went into putting this plan together.

We also appreciated your staff's regular engagement with MCEDD's staff around the transportation-related items in the plan. MCEDD has played a role in convening stakeholders around regional transportation for over a decade. We helped to form and staff the Gorge Translink Alliance, a coalition of the five county transit providers and others involved in public transportation. This effort has led to coordination and expansion of services, offerings like the multi-provider GORge (Transit) Pass and the Gorge Regional Transit Strategy.

With our perspective focused on economic development and transit coordination across our five-counties, we offer these comments on the draft plan:

- In general, we see throughout the plan how the Commission staff is walking a fine line between what the Commission can control and its desires to have a positive impact on climate change. We encourage the Commissioners to keep close focus on the actions you can control through a land use process and avoid any overreach of authority. We appreciate actions that support others doing the implementation work, including supporting transit through assistance with funding opportunities and establishing supportive land use policies. Partnerships and cooperation with the NSA counties is also essential.
- Development in the National Scenic Area is already very difficult, with the first purpose restraining the second purpose. We recommend avoiding new barriers to development, or successful operation of existing development such as agricultural and forestry operations. We prefer language that makes desired actions voluntary, or supported with compensatory incentives. We are opposed to creating new requirements or involuntary limits, such as on new cultivation (pg. 55 of the plan) or building size (pg. 66 of the plan, contemplated for the future).
- While we appreciate the inclusive approach to considering climate change's impacts on different populations, low-income communities and seniors are often disproportionately impacted by the effects of climate change, and these two populations have not been specifically called out. Similarly, investments to fight climate change such as investments in transit or home weatherization can have the most beneficial impact for these populations. We recommend adding them to your list for specific consideration.
- We see opportunities in the plan to better support the infrastructure needed to limit climate change. This includes allowing broader opportunity for energy generation and vehicle charging in rural landscapes. Additionally, ensuring our utility providers can upgrade their infrastructure without cumbersome permitting processes will support additional electric vehicle adoption,

create more climate resilient communities via infrastructure hardening, and reduce the need for commutes as increased broadband connectivity allows for remote work in our rural areas.

- The 2020 Management Plan's added "consideration of equity impacts and greenhouse gas emissions" in any Urban Growth Area expansion request and is reiterated in this plan. There is no clear methodology for assessing these impacts or determining what is reasonable. We therefore encourage the Commission to remove reiterating this policy recommendation until a methodology is clearly identified with a clear process for requesting expansions.

Thank you for accepting these comments. We welcome additional partnership with your staff as both entities work to meet the second purpose of the Act while protecting resources named in the first purpose and impacted by climate change.

Sincerely,



Jessica Metta
Executive Director



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 S 11th Street, Ridgefield, WA 98642
Telephone: (360) 696-6211 • Fax: (360) 906-6776

August 8, 2022

Columbia River Gorge Commission
PO Box 730
1 Town & Country Square
57 NE Wauna Avenue
White Salmon, WA 98672

SUBJECT: Climate Change Action Plan

Dear Commission Members:

The purpose of this letter is to provide support and comments from the Washington Department of Fish and Wildlife (WDFW) on the Climate Change Action Plan drafted by the Columbia River Gorge Commission.

Washington Department of Fish and Wildlife's interest in this climate change plan based on our agency's mandate to perpetuate fish, wildlife, and their habitat (RCW 77.04.012). We fulfill this mandate in partnership with local jurisdictions, which have the authority and responsibility to regulate land use. In support of your Action Plan, our role is to provide science-based technical assistance related to fish, wildlife, and their habitat. The Washington Department of Fish and Wildlife understands that the Action Plan is in its final stages but wish for our comments to be considered in the final update.

Recommendation #1. Washington Department of Fish and Wildlife has finalized the new Management Recommendation for riparian ecosystems to reflect new best available science focused primarily on aquatic species (our *Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications* was published in May 2018.) In summary, the science indicates most of the functions and values provided by riparian ecosystems for fish and aquatic wildlife can be provided by protecting the area that lies within the distance from the watercourse measured by the height of the tallest mature tree typical for a specific site. We refer to this as Site Potential Tree Height at 200-years, or SPTH₂₀₀ and WDFW has developed an online [SPTH Mapping Tool](#) available now that provides parcel-specific SPTH₂₀₀ information for much of the state. Further, the science supports, and thus WDFW recommends, using SPTH₂₀₀ to identify the extent of the riparian ecosystem that should be protected in support of fish and aquatic wildlife for *all* streams, not just those bearing fish. We recommend using this tool to “updated buffer policies to improve stream and riparian conditions” listed under the plan’s coldwater refuge and riparian action outcomes.

Recommendation #2. For the Washington state portion of the scenic area, we recommend using WDFW's Priority Habitat and Species (PHS) database for the most current data and management recommendations. Priority Habitat and Species contains the best available science about species and their habitats synthesized into one location. Washington Department of Fish and Wildlife believes this would greatly reduce the time and resources the commission currently expends maintaining mapping and defining regulated habitats. This would be particularly helpful in mapping Oregon white oak and winter range for deer and elk.

Winter range habitat of deer and elk is of particular concern to WDFW, because development trends have increasingly fragmented this habitat type within the scenic area. Conversion to vineyards and the addition of fencing to protect vines has reduced available habitat for both deer and elk. Moreover, solar development farther east (outside federal designation) is also occurring with the same type of fencing. Collectively, this will reduce available winter range for deer and elk throughout the Gorge. The Action Plan calls to designate open space for landscape scale habitat protection for these habitat types which is a strategy that supports WDFW's goal to protect winter range.

Washington Department of Fish and Wildlife appreciates the monumental amount of work that has gone into this Action Plan and the proactive nature of the plan itself to address climate change. We look forward to continuing to assist you in the coming months. Please feel free to contact me at any time if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amber Johnson', with a long horizontal flourish extending to the right.

Amber Johnson
Habitat Biologist
Washington Department of Fish & Wildlife
PO Box 484
White Salmon, WA 98672
Cell: 360-701-2738

Date: 08 August 2022

From: Mary Repar
P.O. Box 103
Stevenson, WA 98648
e-mail: repar@saw.net

Subj: Comments on the Columbia River Gorge National Scenic Area (CRGNSA)
Climate Change Action Plan (CCAP)

Dear Gorge Commission, Director, and Staff

Climate change is here to stay and although we are all paying more attention to the alarming reports of how we humans and our environment are and will be affected, the jury is out on whether we have come to the game too late to reverse the outcome and from now on we will be attempting to mitigate all the cumulative effects of climate change that will affect us in the future. I'm hopeful that we can affect some changes, but not all. And, certainly not in time to save species, ecosystems, and perhaps humanity.

Climate change is the number one priority for the survival of the human race. If people can't grasp that concept, they are deluding themselves and contributing to the eventual extinction of the human race. If we cannot learn to work within the natural processes that govern the ecosystem that we call Earth, we are doomed to extinction as a species. The Earth will get along quite nicely without us. In this context, the Vital Signs Indicators are critical to the success of the Climate Action Plan and should be fully staffed and funded. How much does survival cost? Survival is priceless.

My comments are based on the Draft For Public Comment, April 27, 2022 Version.

First, few comments to start this process: I believe that the GC should do research and input comments on the very dangerous and egregiously data and analysis deficient Goldendale Energy Storage Project which I consider a threat to the waters of the Columbia River, the environment, the ecosystems, the geology, and the cultural heritage around the proposed site and surrounding environs in the NSA; also, the GC should make agency level comments on the Columbia River Treaty which is up for renewal in 2024—the waters and environs of the Columbia River that are in the National Scenic Area are also part and parcel of the GC's jurisdiction and the Treaty affects the Columbia River waters.

Water and land. Waters are the limiting factor for human survival—we need water to live and grow our food. IF we don't have water, our survival is an open question.

Wetlands are also critical components of the water ecosystems. They are the sponges and cleaners of our waters and they are decreasing every year due to over-development and human encroachments. The following references speak to the importance of wetlands:

https://www.columbiagorge.com/news/the-wonder-of-wetlands/article_142496ac-9be7-11eb-b737-7f24e7272b02.html

The wonder of wetlands

By Heather Hendrixson, Hood River Soil and Water Conservation District

Apr 13, 2021

Swamps, bogs, marshes, mud puddles — they go by many names, but wetlands are an important feature of the landscape for many creatures, plants, and habitats. They are vital for overall watershed health, water quality and well-functioning hydrology. Perhaps you have a wetland on your property, or you notice them elsewhere throughout the Columbia Gorge.

Development should never be allowed in or near wetlands. Wetlands are the critical key to water quality.

And, the following reports on the water supply can be used as a resource:

2011 Washington State Legislative Report, Columbia River Basin, Long-Term Water Supply and Demand Forecast, Publication No. 11-12-011, Submitted Pursuant to RCW 90.90.040 by WA Department of Ecology in collaboration with Washington State University and WA Department of Fish and Wildlife

“This 2011 Forecast was developed by OCR in collaboration with Washington State University (WSU) and the Washington Department of Fish and Wildlife (WDFW). The Forecast will help OCR strategically fund water supply projects by improving understanding of where additional water supply is most critically needed, now and in the future. The Forecast provides a generalized, system-wide assessment of how future environmental and economic conditions are likely to change water supply and demand by 2030. It also analyzes the impacts likely to occur if additional water is made available to users, though it does not consider the benefit-cost ratio of any individual project.” (my bold, from 2011 WA State Leg Report)

Every project should have cost-benefit ratio analyses. This is a no-brainer. We should all know the full risk for any project. Cumulative Impacts and Effects analyses are critical to the success of projects but they are crucial to our decision-making processes. If we don't know the costs and benefits how can we make rational, reasonable decisions that affect our quality of life and our environs? (The NEPA handbook on Cumulative Effects, by the Council on Environmental Quality is a very good resource.)

There are many resources with the available science to help us make good decisions that will have minimal or no impacts on our environment. We just have to find them, analyze them, and integrate them into our decision-making.

The WRIA update of 2016. Water Resource Inventory Areas for Washington State compiled at 1:24,000 scale. Feature Layer by https://www.arcgis.com/home/user.html?user=WAECY_Geoservices, Created: May 11, 2015 Updated: Apr 11, 2016

<https://www.arcgis.com/home/item.html?id=d3071915e69e45a3be63965f2305eeaa>

2016 Washington State Legislative Report. Columbia River Basin Long-Term Water Supply and Demand Forecast December 2016, Report number: 16-12-001

Project: [Watershed Integrated System Dynamics Modeling](#)

Authors: [Zubayed Rakib](#), [South Florida Water Management District](#)

Citation: Rakib, Zubayed. (2016). 2016 Washington State Legislative Report. Columbia River Basin Long-Term Water Supply and Demand Forecast.

Submitted December 2016 Pursuant to RCW 90.90.040 by:

WA Dept of Ecology in collaboration with WA State University, State of WA Water Research Center, the University of Utah, Aspect, WA Dept of Fish and Wildlife.

<https://www.usgs.gov/geology-and-ecology-of-national-parks/ecology-columbia-river-gorge-national-scenic-area>

Ecology of Columbia River Gorge National Scenic Area

By [Geology and Ecology of National Parks](#)

Additionally, the United States Forest Service partners closely with the Columbia River Gorge Commission to develop management plans that require coordination with the six counties and tribal leaders (2). Within the Columbia River Gorge, the USGS [Nonindigenous Aquatic Species \(NAS\)](#) Program monitors, analyzes, and records sightings of introduced aquatic species in and the Columbia River Gorge and in wetlands, lakes, rivers, estuaries, and coastlines throughout the United States. This database provides documentation of species occurrence and is used to determine the patterns, pathways, and potential colonization of species (3).

Foods and Plants. Climate change means that some foods and plants will not survive. How we handle the loss will determine if we will adapt to climate change or struggle to conserve and preserve plants and foods that cannot be saved.

It's not our job to kill off certain species because we have created a situation where those species take advantage of that situation. We cannot kill off seals to save the salmon because it is humans that are the perpetrators of salmon declines; we have built dams, filled the waters with toxins, and put so many demands on a limited resource that it is doubtful that the Columbia River will survive into the next century.

On p. 7, Executive Summary, the statement "...oak woodlands are one of the fastest changing systems as a result of development and fragmentation, invasive species, historical fire suppression, leading to..." baldly states that invasive species are one of the destruction of oak woodlands. I would posit that it is humans, with their development and too much fire

suppression that have caused new species (what some call invasive species) to enter our ecosystems. The problems are man-made. Don't blame Nature's response.

Oak Habitat. <https://storymaps.arcgis.com/stories/f81fd0d3904b06a1e29135f2b80da3>

Columbia Gorge Recreation and Conservation Opportunity
American Whitewater
Columbia River Gorge

In November 2021, three entities with strong Northwest ties and deep expertise in timberlands, forest conservation, and mill operations acquired 96,080 acres of timberlands previously owned by SDS Lumber Company and the mill. Located within the Columbia Gorge in Washington and Oregon, these lands are of significant environmental and community importance. They include important oak habitat, municipal drinking water sources, and recreational resources that include river frontage on the White Salmon River.

P. 8, Climate Resilient Lands. Resilient land building will require larger buffers between urban, ex-urban, rural areas and the Wild. Specifically, I would recommend graduated buffers that gradually lead from human habitations to the wild country.

“Green corridors” and “ecological connectivity” are crucial to wildlife and would help to rehab habitat fragmentation.

P. 9. Emissions. I'm not sure what the GC can do to influence emissions caused by the railroads, the cars, and truck traffic. The railroads certainly could do better: they could produce their own electricity by running solar panels on some cars and storing the energy in special cars. A mile long train could produce a lot of energy with all those turning wheels! They could even produce enough energy to sell and make some money.

Cars are a bigger issue because they outnumber trucks and rail. Putting in EV stations for electric vehicles (EVs) is a start. But, there is no free lunch. EVs are still produced and leave a manufacturing carbon footprint. The electricity in the EV stations is still produced by hydropower or natural gas. Any new, greener technology will have a cost-benefit ratio and that ratio should be defined at the beginning of the transition and not too far down the road.

And, as our technologies become less and less dependent on fossil fuels and are upgraded to newer, more efficient, and, hopefully, cleaner technologies, the production loops should be closed recycling loops so that we don't contribute more pollution into the system. New tech is fine but it should not be worse than the old tech!

Trucks. There are a lot of trucks on the roads of America and many pass through the NSA corridor. Truck tech needs to improve—again, why don't trucks have solar panels and batteries so they run on electric power?? This improvement in tech would benefit the entire planet and not just our Gorge.

P.11, Carbon Storage. Trees. What is the effect of too few trees on O₂ production? What is the effect of cutting old growth trees that sequester more carbon than younger trees? Research on old growth carbon sequestration has been done by many universities and scientists, see below. There is enough data to show that old growth trees sequester more carbon than younger trees. And, they are more resilient during fires. OSU has done research on this issue. This discussion is a timely one since some people are using fire risk as an incentive to cutting older trees, which coincidentally also yield more board feet. The discussion about fire risk should not be used as an excuse to cut down more trees!!

Carbon credits should also be investigated so that counties could make money from selling their carbon credits.

<https://fjfsdata01prod.blob.core.windows.net/articles/files/867112/pubmed-zip/.versions/1/.package-entries/ffgc-05-867112/ffgc-05-867112.pdf?sv=2018-03-28&sr=b&sig=oy2f8LIE1ijAFFkRCvmFbYK9RcGvugSaCwbRVImStg0%3D&se=2022-07-21T22%3A01%3A33Z&sp=r&rscd=attachment%3B%20filename%2A%3DUTF-8%27%27ffgc-05-867112.pdf>

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Emission Sources Are Not Equal:

Putting Fire, Harvest, and Fossil Fuel Emissions in Context.

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Forest Carbon Emission Sources Are Not Equal: Putting Fire, Harvest, and Fossil Fuel Emissions in Context

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Tara W. Hudiburg¹

¹ Department of Forest, Rangeland, and Fire Sciences, University of Idaho, Moscow, ID, United States, ² Management of Complex Systems, University of California, Merced, Merced, CA, United States

Climate change has intensified the scale of global wildfire impacts in recent

decades. In order to reduce fire impacts, management policies are being proposed in the western United States to lower fire risk that focus on harvesting trees, including large-diameter trees. Many policies already do not include diameter limits and some recent policies have proposed diameter increases in fuel reduction strategies. While the primary goal is fire risk reduction, these policies have been interpreted as strategies that can be used to save trees from being killed by fire, thus preventing carbon emissions and feedbacks to climate warming. This interpretation has already resulted in cutting down trees that likely would have survived fire, resulting in forest carbon losses that are greater than if a wildfire had occurred. To help policymakers and managers avoid these unintended carbon consequences and to present carbon emission sources in the same context, we calculate western United States forest fire carbon emissions and compare them with harvest and fossil fuel emissions (FFE) over the same timeframe. We find that forest fire carbon emissions are on average only 6% of anthropogenic FFE over the past decade. While wildfire occurrence and area burned have increased over the last three decades, per area fire emissions for extreme fire events are relatively constant. In contrast, harvest of mature trees releases a higher density of carbon emissions (e.g., per unit area) relative to wildfire (150–800%) because harvest causes a higher rate of tree mortality than wildfire. Our results show that increasing harvest of mature trees to save them from fire increases emissions rather than preventing them. (my bold)

Fire. Fire is a scary subject. We fear it and yet it provides warmth and security for humans. Perhaps we need to understand fire better. As a resource for learning about the the effects of the severe fires that we are seeing in our environs, I would recommend the research of Dr. Dick Hutto to learn about the benefits of severe fires. See below. Also, the South Gifford Pinchot Collaborative hosted Dr. Hutto earlier in 2022 at one of their meetings and I believe there is a recording available of his presentation.

Fire Effects Field Trip with Dick Hutto

The Blue Mountain Fire Effects field trip was held during the 2014 Large Wildland Fires Conference in Missoula, MT, co-hosted by the Association for Fire Ecology and the International Association for Wildland Fire. The field trip summary and videos below capture the main topics discussed during the field trip. See also the [Additional Resources](#) from Dr. Dick Hutto's fire effects research. <https://www.nrfirescience.org/event/fire-effects-field-trip-dick-hutto>

Hutto, Richard & Bond, Monica & Dellasala, Dominick. (2015). Using Bird Ecology to Learn About the Benefits of Severe Fire. 10.1016/B978-0-12-802749-3.00003-7.

Jul 5, 2022 — PDF | Important lessons emerge from studies of birds in ecosystems born of, and maintained by, mixed- to high-severity fire.

I have never been a fan of the word “manage” or “management” as used in conserving and preserving our resources. People who can’t manage their own societies and affairs should not think that they can “manage” Nature and its billions of years old processes. What hubris.

One of the biggest challenges for the GC is: HOW MUCH DEVELOPMENT IS ENOUGH DEVELOPMENT IN THE NSA? Mitigation is used too often to justify more development. To me, mitigation is just an excuse to do what we want.

Economic viability is not a given if we are trying to save the resources of the NSA. In 1986, the population of the NSA was, I believe, 44,000. Today, it has grown far beyond that and the numbers should be put in the climate change database. The impacts of all of the humans on the NSA have grown even more. We cannot continue to build economies, have people come to live and work in those economies, and have the population grow so that we need more economies. That is a death spiral.

Housing. With rising population, we will never catch up with affordable housing. Housing policies have to change if we want Equity in Housing. Second homes, vacation homes, multiple housing being owned by corporations and other entities, these will have to stop. More affordable home building will have to become a policy every time a housing development is built. Will we be a nation of home owners or renters? Will workers be able to live in the area where they work? These are policy issues that the larger society has to address.

National housing policy needs to be addressed here, too. Greed has overcome better sense since the 2008 financial debacle that was caused by more greed. In 2008, thousands if not hundreds of thousands of home owners lost their homes. Many of these homes were bought up by entities inside and outside the United States, such as corporations and other nations, thus taking many of these homes off the housing stock market and making them rentals. That needs to be outlawed and housing policies changed. This is capitalism run amuck.

p. 13, cold water refuge streams and riparian habitats. How we keep our waters colder so that fish can survive is a long-term problem. Less development and larger buffers close to streams would be a start.

Putting less or NO pesticides and toxins into our waters would also be helpful. Runoff from agricultural properties is added to the Total Maximum Daily Load (TMDL)* every year. The cumulative impact and effects from pesticides and other toxins cannot be emphasized enough.

***“A TMDL is developed by determining the maximum daily load of a pollutant that a water body can assimilate and still meet Water Quality Standards. Generally, a TMDL begins by collecting and analyzing water quality data to determine the extent of the issue.”**

Decreases in fish populations are also caused by dams. Dam removal on the Columbia River should be on the discussion agenda. Is there a way to use the power of moving waters to create energy without affecting the waters and the species in those waters? Can we put in weirs to help fish navigate our rivers better? Can we do more to help the wild species survive? How do dams affect the genetic diversity of fish species and other aquatic inhabitants? We will have to face the question of dam removal and it is better to do it sooner rather than later when we humans are no longer in control of what happens in the processes of our planet.

p. 15. Grasslands are proving to be critical to the environment. Prairie grasses with deep roots are better for drought prone environments. The deep roots break up the soils and allow water to go down deeper and farther. The paragraph “Grassland bird populations are in decline and grassland habitats are among the most threatened nationwide from non-climate stressors including wind, solar, and other development, and habitat fragmentation. In the NSA, the

greatest potential for new development and new land divisions occurs in the eastern Gorge in grasslands and scablands.” This paragraph tells us all that is wrong in the NSA—even though we know that these stressors are occurring, we still continue to allow development, wind, solar (although there should be more info on just how and where solar is impacting the habitats) to happen. This is very counter-productive to our survival on this planet. **We only have one planet. There is no Planet B!**

There are ways to improve the prairie habitats and there is enough science about bovine hoofs and prairie aeration that good protocols could be designed in order to rehabilitate or improve prairie habitats that “store significant carbons in soils and vegetation...”

Invasive species. Invasive species carve inroads into habitats because of human activity. Once an invasive species gains a foothold it is almost impossible to get rid of it. But humans use herbicides and pesticides to try to beat back the invasives and this causes more and continuing harm to the environment. The only way to beat invasives is to improve the environment for the native species. Humans are an invasive species, too, except there is nothing that can outcompete us at this time. Everything was an invasive species at one time until it became native over time.

The use of pesticides leads to “superweeds” and pests. The strongest survive and just get harder to kill with pesticides and other lethal chemicals. And, all these chemicals are harmful to the soils and to living things. So why do we continue to use them? It’s not very smart of us.

p. 18. Limiting new development in forests is a good start. However, I have reservations about “reducing permitting barriers for forest resilience treatments” because I fear that this will be an excuse to cut down more trees, especially older trees that provide more board feet of lumber. We have seen this being done in some fires, especially along roads where “hazard trees” are designated and the cutting commences!!

p. 19. Talus mining. Why would we allow any mining in unconsolidated talus slopes? Seriously.

p. 25. Population and Infrastructure. Population might be the highest and biggest stressor to the entire NSA. In 1986, the population of the entire NSA was 44,000 according to the records. What is it today? That question needs to be asked and answered. It would have been best to make the NSA a park and limit population growth but that did not happen. The GC may have to ask the hard questions about limiting development to limit population growth. And, we will probably have to limit tourism access to some of the most used areas in order to save the ecosystems. Death by a thousand cuts is still a death.

Since 1986, with population growth has come growth in infrastructures—water plants, septic fields, electrical grids, sewer systems, roads, etc. Every one of these affects climate change.

p. 26, agricultural uses and practices. We all need food to survive. Food is expensive to produce. And it is very hard work to grow and produce food. However, that does not mean that the people who labor in the fields should not make a living wage on which they can live. And,

they should most definitely not be exposed to chemicals that affect their health. Chemicals are dangerous and yet we continue to use them as if we are immune to their cumulative effects.

The 11,000 or more lawsuits worldwide about the health effects of the glyphosate Roundup on humans point out that eventually the cumulative impacts catch up to us.

Water will be the chokepoint in the Gorge. For three years, Bingen and White Salmon had to boil water for safety reasons. The Mt. Adams glacier is melting very fast and streams are drying up in Skamania County and elsewhere. Wells are having to be dug deeper. in Skamania. The Mosier basalt aquifer is, according to the reports that I read, dropping 4 feet per year. This portends further water, and more impactful, water issues in our future.

What does “encourage and reduce regulatory barriers to water conservation” mean? Do we really want to make it easier for people to get to water when that water is a decreasing resource?

p. 27, Forests. In the 32 years that I have lived in the Gorge, the timber line—pine and fir—across the river in Cascade Locks, OR, has climbed to the top of the mountains. There are more deciduous trees among the pines and firs, too. There appears to be a dividing line West of Hood River, OR, as we head into the Gorge proper; in the Fall, one can see more deciduous trees East of this dividing line than when going West. Change is coming whether we accept it or not.

P, 28, Public roads. “Adaptation will be limited by capacity and funds,” is such a mind boggling statement, I don’t know where to start!! The survival of the species depends on how we adjust to living with climate change, how we build our resilience so that we do survive, and how we are going to do this together. There are always funds for what we really want to do. Climate change isn’t what we want to do, it’s what we need to do to survive and not become extinct. **Funding for climate change is our first and only priority—our survival, and the survival of other species, depends on it. It is a need and a must, not a want.**

p. 30, Climate change hazards and risks. Climate change is happening. It is only the degree and severity that will impact our planet and its environs that is in question. We can build resilient responses and systems but it is going to take time and dedication. Cumulative impacts analyses and effects have to be done so that we can assess our level of risk. Cumulative impacts analyses should be done on human non-resilience and/or human inaction(s) in the face of climate change. See below:

Considering Cumulative Effects Under the National Environmental Policy Act is intended to assist Federal agencies with analyzing cumulative effects during the NEPA process. It outlines general principles, common cumulative effects assessment methodologies, and resources for additional information and background data.

The GC is a federal agency through its connection to the the USDA Forest Service and should be using this handbook when considering cumulative impacts and effects.

The "magnitude of loss is the extent of the disruption to a system...or the costs...of consequences..." Survival should be a cost in this analysis. Costs are definitely not just counted in monetary values.

p. 31. Other cultures, such as the Israel, can teach us how to survive and thrive in a desert environment when temperatures get higher. Surviving climate change will require cross discipline collaboration among nations.

Building codes will have to change. Buildings with thicker insulation, smaller windows, thicker glass should become a norm.

P, 37, EV infrastructure. Electrical vehicles still use our roads, they still use some fossil fuel, and they use electricity which is usually produced by natural gas to power up. I'm sure that there is solar technology that can be used at the EV stations. Why don't cars produce their own energy since they have rotating wheels? A cost-benefit cumulative impacts analysis should be done for EVs and the infrastructure that supports them. There is no free lunch and every technology will cost something in environmental cost. We should strive to First, do no harm in any new technologies, however.

The Precautionary Principle is a lane in the highway to our survival.

It is also time to start looking at other "clean" energy options now and not wait.

The electric tractors option is good news. Trucks and trains should be next.

p. 48. There are many agencies and entities that are working on climate change. We don't have to reinvent the wheel in climate change strategies and tactics. The hardest task for the GC staff will be to integrate all the data and diverse projects analyses and summations into a coherent, usable format. More staff and larger databases will be required.

p. 61. "Encourage landowners to access grant funds and programs for small forest projects and Firewise activities." These programs are hard for regular people to access and use. **I suggest that there be a GC GRANT FACILITATOR to help people access these funds.**

p., 69. Baselines need to be established as soon as possible. The Vital Indicators Project (VIP) was done in 2007. It is now 2022. It is way past time that the now-renamed Vital Signs Indicators have actual baselines associated with each indicator. Both OR and WA need to get aboard with this project.

I thank the GC staff for putting together a great first step in our endeavors to address climate change in the NSA. This document is a evolutionary step forward in the process of addressing climate change. What we learn in the NSA about climate change and its effects and impacts can be a capstone from which others can learn.

Questions:

What is the effect of too few trees and other vegetation on O₂ production??

Is there a baseline for the economy?

Are wild fish more or less temperature tolerant than hatchery fish? Do we really need hatchery fish? Are we diluting our wild fish populations by continuing to produce hatchery fish? Should our efforts be aimed more toward improving the environment for the survival of wild fish and other wild species?

Are hatchery fish more or less prone to diseases?

Can wild fish adapt better to changing stressors, such as warmer waters, warmer temperatures, etc., than hatchery fish?

How is the GC coordinating climate change issues with NSA cities and rural centers and unincorporated areas??

How about a trail to Dog Mountain, a much-loved to death tourist area, from the back side?

Do Skamania county's unmapped lands pose a development threat to the environment?

Corrections:

p.12, exec summary, change "multi-facited" to "multi-faceted"

p. 12, exec summary, define LUDs

Recommendations:

Define all acronyms when they are first used, and put them in the definitions table.

Start a citizen science data gathering project for First and Spirit food sightings. People can use their cell phones and GPS location to take a picture and upload to a database on the GC web site.

Solar EV charging stations.

Update "green" technology as it comes into use. This would require an integration of disciplines.

Coordinate with WADOT and ODOT to prevent pesticide use along the I-84 and HWY 14 corridors. Pesticide use just makes green, dead vegetation which is a fire hazard. It also promotes the spread of invasive. And, it looks dead and ruins the aesthetic value of the NSA.

Sincerely,

Mary Repar/email signature/



BOARD OF COUNTY COMMISSIONERS

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Pioneering pathways to prosperity.

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

August 8, 2022

Subject: CRGC Climate Change Action Plan Draft

Dear Commissioners;

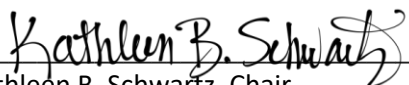
Thank you for the opportunity to provide comment on the draft Columbia River Gorge National Scenic Area Climate Change Action Plan (CCAP). We appreciate Columbia River Gorge Commission's (CRGC) work to improve our local resiliency, and have a couple recommendations for ways to improve the draft.

First, we have appreciated your staff's willingness to work with our staff through this process and would encourage that effort to continue. We would ask that ample time is allowed to work not only with our county staff on these items, but all of the other counties in the Scenic Area as well. Wasco County staff has put a great deal of effort into reviewing the draft plan and has been working to identify elements that could be a challenge to the implementation and management of the plan at a local level. Several of the recommended policies could have far reaching impacts not only to economic sectors like agriculture, forestry, and tourism, but also resource protections.


Additionally, we would ask that this plan work to coordinate with the regional efforts that are underway to address climate change. It will be critical to coordinate with them to ensure consistency and reduce conflict. We are supportive of policies which seek to reduce barriers to resiliency or similar projects including permitting. Whether its riparian restoration, FireWise tree maintenance practices or natural hazard recovery, our many partners would greatly benefit from reduced time and resources to permit these helpful projects.

Thank you for your consideration.

Wasco County Board of Commissioners


Kathleen B. Schwartz, Chair


Steven D. Kramer, Vice-Chair


Scott C. Hege, County Commissioner



August 8, 2022

Columbia River Gorge Commission
PO Box #730
White Salmon, WA 98672
(Sent by email to 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 (CCAP) and the extension of time for public comment.

I would also like to extend my appreciation for staff Lisa Naas Cook and Jessica Olson for their engagement following my June 13th letter. Staff has indicated, based on feedback, the following revisions to the CCAP will be made:

- Language indicating planners will assess oak condition and function has been modified to indicate planner access rather than assessment.
- More information will be provided about the VSI Monitoring framework to better highlight its relationship with the CCAP.
- The climate resilient land data will be made available in an appendix, and the language in the CCAP will be clarified to be more specific to high climate resilient areas, as opposed to the more generic “climate resilient lands.”

Because a revised draft was not publicly available ahead of the August 9th public comment deadline, I am submitting additional comments as a supplement to my letter submitted on June 13th.

Agriculture

On July 28th, I facilitated a conversation with Ms. Naas Cook and Ms. Olson and six state, regional, and local subject experts on agriculture and wildlife. The purpose of this conversation was to provide expert input on the proposed policy to limit new cultivation in deer and elk winter range, and offer potential alternative strategies to achieve similar goals with less impact to a critical foundation of our local, regional, and statewide economy, agriculture.

A key clarification offered by CRGC staff and discussed by the group was the significant difference between deer and elk winter range and oak habitat. There was consensus that oak woodland protection

was critical, but that it must be decoupled with deer and elk winter range as there are some significant differences and furthermore, oak woodland is priority habitat for a myriad of other species.

Subject experts had the following recommendations to offer:

- The CCAP should reference existing incentives, like grant programs from OWEB or NRCS, that a land owner could access in exchange for preservation of oak woodlands.
- Education and outreach about oak woodland habitat is critical, and the CCAP could leverage many existing efforts within the agricultural community to further bolster awareness about oak woodland habitat.
- Conservation easements are another tool that could be explored to ensure for preservation of oak woodlands on agricultural lands.
- Other development or uses, like residential or recreation, often pose a greater threat or disturbance to oak woodlands than agriculture.
- Additional regulation on new cultivation may have unintended consequences, particularly when considering certain types of agricultural practices that require long term planning for crops that may exceed the five year time frame triggering the new cultivation definition.

The existing Management Plan language requires priority habitats, like oak woodlands, be protected when a review of new development or uses occurs. Incentives and easements can offset potential losses, while education strengthens the understanding of the protected resource. Oak woodlands already currently co-exist with agriculture in the National Scenic Area, and, subject experts have remarked, continue to provide invaluable habitat for a variety of species.

The difficulty, as emerged from discussion, is that the threat comes from land clearance and not cultivation. The Management Plan currently requires adherence to certain criteria in the Special Management Area (SMA) for new cultivation requiring clearing of trees. This requires collaboration with agencies including NRCS. It may be beneficial to adopt similar guidelines for the GMA that trigger collaboration with NRCS, the East Cascades Oak Partnership (ECOP) and others who can then, as part of the required Stewardship Plan, point land owners to incentives and tools like easements to ensure preservation of priority habitat while offsetting loss of productive grounds.

However, as I highlighted in my June 13th letter, part of the difficulty with a no net loss oak woodland policy is that clearance often occurs ahead of development review. This is why education may have more significant impact in this case than regulation. As our agricultural community shared on the July 28th call, their industry is forward focused and one of the best allies for climate change strategies including carbon sequestration, modifying agricultural practices to reduce emissions, and preservation of resources. A coordinated campaign, with partner agencies and organizations, to spread awareness about the importance of oak woodland habitat could likely see greater returns than limitations to new cultivation which will only catch a fraction of oak clearance.

Although the Management Plan does not use incentives as an approach to SNCRs protections, it does rely on coordination and collaboration with partners, many of which do have funding available to preserve oak woodlands. The coordinated campaign could share this and other information to compel protection. My recommendation, based on input from subject experts, is that the CCAP be modified to emphasize partner coordination including conservation easements, incentives, and education as tools to reduce oak woodland habitat loss over indiscriminate limitations on new cultivation which may result in unintended consequences, particularly when coupled with deer and elk winter range.

Recreation

I understand CRGC staff reached out to regional recreation managers for recommendations on how to include recreation in the CCAP. Based on my conversation with CRGC staff, I think it's important to highlight that my concerns and the concerns of partners extend beyond federal lands to state, local, and private recreation facilities in the National Scenic Area.

I have observed that there is often an assumption that recreation, particularly low intensity, has less impact on the SNCRs than development like houses or agriculture. However, even low intensity recreation uses can have significant impact when the volume of visitors exceeds the carrying capacity of the land, water, and air. I would advocate for the following strategies, related to recreation, be added into the CCAP:

- Re-evaluate the Recreation Intensity Class land use designations to ensure they are consistent with climate resilient lands, CCAP policies, volume of visitors, and seasonal considerations.
- Use a science based approach that evaluates recreational activity impacts on the SNCRs, and leverages the VSI monitoring to develop a long term framework to ensure inventories are consistent with on the ground realities.
- Promote education to visitors about alternative locations for recreation given capacity and other constraints.
- Strengthen GMA policy to work with local emergency services to ensure consideration of increased service demand impacts.

Recreation, as one of the unique resources protected under the National Scenic Act but also a source of added stress when considering high volume of cars, traffic, noise, and people on the landscape, deserves to simultaneously be viewed as a resource at risk from climate change and a threat.

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. In most cases, these types of activities should be a use permitted without review.

The CCAP continues the recent updates to the Management Plan to limit dwellings in the forest zone. 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, State Fire Marshall's Office, 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.

Wetlands, Streams, and Riparian Areas

As stated in my June 13th letter, I would recommend policy language be softened until significant data analysis can be conducted to understand whether increased buffers would, in fact, better preserve wetlands, streams, and riparian areas.

Mining

Aggregate mining is critical to regional and local infrastructure, and eliminating these aggregate sources could have unintended consequences, including increasing greenhouse gas emissions for local jurisdictions when making seasonal maintenance or improvements.

UGB/UGA Expansion

The CCAP advocates for the Gorge 2020 adopted policy 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 would encourage the Commission to remove this policy recommendation until such a time methodology for these pieces are clearly identified and understood to ensure for a clear process by which jurisdictions may request a UGA expansion or, at a minimum, clarify the process, including opportunity for public comment, that will develop a clear and objective methodology for understanding these criteria.

Diversity, Equity, and Inclusion (DEI)

As Wasco County has shared in the past, 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 policies and recommendations for public outreach and involvement are inadequate and only reach a population that has easy access to the internet and/or are connected to advocacy groups. Oregon counties consistently bear the cost of required noticing to our communities, but are procedurally required to do so outside of any meaningful legislative process, so that our property owners often find out about updates after public comment has been closed. If the Columbia River Gorge Commission intends to be inclusive and equitable, it must diversify its methods of public outreach including adherence to the more restrictive Oregon standards for property owner notification.

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

Sincerely,



Kelly Howsley Glover, PhD
Wasco County Planning Director



Friends of the White Salmon River

Post Office Box 802
White Salmon, Washington 98672

friends@friendsofthewhitesalmon.org
www.friendsofthewhitesalmon.org

Columbia River Gorge Commission
P.O. Box 730
White Salmon, Washington 98672.

Submitted via email to: ClimateAction@gorgecommission.org

RE: Climate Change Action Plan

Friends of the White Salmon River (FWSR) is a non-profit organization dedicated to protecting the White Salmon River and its watershed for fish, wildlife, and for the residents of the area. FWSR's supporters include citizens of Klickitat and Skamania Counties and others who live, work and recreate in the White Salmon River watershed. Our members and supporters would be negatively affected by land use actions that have an adverse effect on the river, its tributaries, and wildlife habitat.

We affirm our support of measures throughout the Plan to respect treaty rights and work cooperatively with the tribes. In particular, in the context of the Plan, we support the goal to protect culturally important plants.

A good many of the priority actions described in Pat III Commission Priority Strategies and Actions are to revise the Management Plan and/or to make policy changes. We have to ask – how hard and complicated is it to do these things? Also, the effectiveness of policy is in the application and enforcement, not in the writing.

Of particular interest to us are the goals for streams, wetlands, and climate resilient lands. The Executive Summary graphic on page 3 shows four land and water adaptation priorities: cold water refuge, wetlands, tribal treaty rights, and oak woodlands. "Climate Resilient Lands" shows up on page 8 of the Executive Summary, as an "overall approach."

The goals for "Cold water refuge streams and riparian habitat", starting on page 49, seem to address some things that are outside the control of the Commission, such as flow and temperature, which surely depend on upstream actions. We strongly support anything the Commission can do to protect cold water refuge streams; we just think the goals might be unrealistic. The strategies mention buffer policies, but do not set any measure of success for buffers. We think the Commission could have significant success in improving the size and quality of buffers, including along the Columbia itself, and we would like to see more emphasis on buffers.

We agree with the goals and strategies for "Wetlands", and we hope that the action outcome of improving wetland buffers can be emphasized.

White Oak woodlands is of interest to us as one of our priorities is Western Gray squirrel. In that context, we suggest that the Plan put more emphasis on maintaining current oak stands, especially those with older trees, and on identifying where mixed oak-conifer stands can be created (where oak release is possible) or maintained.

“Climate Resilient Lands” appears on page 8 of the Executive Summary, as an “overall approach.” It includes a goal of protecting 70% of these lands. It is hard to evaluate this goal without more information on what land, and how many acres, are identified as climate resilient. Nevertheless, this is an important goal, which we support.

Objective 2 – GHC Mitigation Priorities on page 56 overlaps substantially with Part II: Climate Change Mitigation. It is a little confusing. Regardless, these goals and strategies seem important and to some extent practical.

In particular, the goals and strategies for regional transportation seem promising. There are ready partners for this work, and likely there is strong local support for most of the priority actions.

Our support for the EV charging station goals are tempered by the comment on page 37 of the report. “It is important to consider that electric vehicles do not reduce commutes, traffic, or congestion unless paired with transit, bike and pedestrian paths for local trips, and other strategies. This is particularly important in the NSA where traffic congestion at recreation sites is a major concern and where visitation pressure rises year after year. Electric buses and e-bikes are opportunities many partners are exploring.

“Protecting and Enhancing Carbon Storage” is a worthy goal, although the actual goal, which is to set goals, reflects our current lack of information and analysis. We need a lot of information, such as the detailed land cover data layer for VSI. Until we have a better, more definite understanding of carbon storage in the NSA, conservative measures are called for to preserve forests and wetlands at the least.

Fire Risk: We support some of the priority actions in this section, starting on page 61. However, we have reservations about the first priority action under Strategy 1, which reads “• Update Management Plan to reduce permitting barriers to forest resilience treatments that reduce fire risk (e.g., thinning, burning, defensible space, etc.)” We urge caution in changing policies to make it easier to remove trees, which are needed for all sorts of ecological purposes. We have pushed recreational and residential development father and farther into forest environments. With the increased risk of large fire due to climate change, we need to protect every bit of forest we have, and protect human activity by focusing development in designated areas which can actually be protected.

Talus, page 19, is described as highly sensitive with low adaptive capacity and very high vulnerability. Although limited in the NSA, they appear to be at substantial risk from the combined impacts of climate change and other stressors such as recreation and mining. We recommend that measures be taken as promptly as possible to address the non-climate change stressors, thereby possibility increasing the overall resilience of the talus slopes.

Very truly yours,



Patricia L. Arnold
President

From: [Maria Kallman](#)
To: [Climate Action](#)
Subject: Showing Support for the CCAP
Date: Tuesday, August 9, 2022 7:52:15 AM

Dear Gorge Commission,

I applaud the Gorge Commission and its staff in the development of a plan that prioritizes specific actions, such as new policies and regulations protecting sensitive resources and reducing greenhouse gas emissions. Adoption of a powerful Climate Change Action Plan (CCAP) for the Columbia River Gorge is a vital step toward meeting the daunting challenges posed by climate change.

I hope the following suggestions support specific actions to build climate resilience:

Advocating for non-motorized transportation as a means to travel from upriver on the White Salmon (especially Husum to White Salmon, and across the Hood River bridge) could greatly reduce the amount of carbon emissions in the gorge. A bike lane or path should be a priority for these towns if we want to be part of the change and "walk our talk."

Thank you for considering these comments and the opportunity to show support for the draft Climate Action Plan for the Columbia River Gorge National Scenic Area. We appreciate the work in developing a climate action plan with meaningful actions that increases climate resilience in the Gorge.

Regards,
Maria Kallman
15 Wallace Dr
White Salmon, WA 98672

From: [Dave King](#)
To: [Climate Action](#)
Subject: Showing Support for the CCAP
Date: Tuesday, August 9, 2022 7:53:13 AM

Dear Gorge Commission,

I applaud the Gorge Commission and its staff in the development of a plan that prioritizes specific actions, such as new policies and regulations protecting sensitive resources and reducing greenhouse gas emissions. Adoption of a powerful Climate Change Action Plan (CCAP) for the Columbia River Gorge is a vital step toward meeting the daunting challenges posed by climate change.

I hope the following suggestions support specific actions to build climate resilience:

Personally I would advocate banning oil trains in the gorge. The derailling in Mosier would have caused a terrible fire if the usual wind had been blowing. And oil in the river would be bad.

Thank you for considering these comments and the opportunity to show support for the draft Climate Action Plan for the Columbia River Gorge National Scenic Area. We appreciate the work in developing a climate action plan with meaningful actions that increases climate resilience in the Gorge.

Regards,
Dave King
8716 N Edison St
Portland, OR 97203



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Richard Mahar
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Tom Lannen
District 2

Bob Hamlin
District 3

August 9, 2022

Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98672

Dear Gorge Commissioners,

Thank you for the opportunity to provide comment on the draft Climate Change Action Plan for the Columbia River Gorge National Scenic Area. The impacts of climate change within the National Scenic Area will disproportionately affect Gorge communities, including our residents and the resources that our economy depends upon. To that extent, Skamania County is supportive of strategies to mitigate any negative impacts to the health of Gorge residents, communities, and economies that are based in research and within the scope of the Gorge Commission's authority. We do not support recommendations for mandatory actions that would further restrict land use within the National Scenic Area that do not have any clear relationship to climate change.

During the Gorge2020 process, buffers for certain cold water refuge streams were expanded, but Gorge Commission staff otherwise determined that the existing stream buffers remain consistent with best available science. The draft plan now proposes to further widen stream buffers, but it is not clear what additional benefit this would provide. Furthermore, the plan proposes a goal of no net loss for wetlands, but in our experience direct impacts to wetlands during development are rare. Widening stream buffers and a no net loss policy for wetlands is inappropriate at this time. Instead, the County supports policies to reduce permitting barriers for stream and wetland enhancement projects and policies to incentivize riparian vegetation enhancement when development is proposed near streams. Similarly, the County supports the development of incentives to encourage landowners to protect and enhance Oregon white oak woodlands, but is not in support of new limitations on agricultural cultivation or the creation of new open space designations.

The Gorge2020 Management Plan update resulted in the prohibition of new dwellings in Commercial Forest and Large Woodland zones. We strongly oppose any consideration of additional prohibitions on the use of forest lands for residential use. Allowing forest dwellings in



conjunction with forestry operations can encourage better forest management practices. Instead, the County would be supportive of uniform fire protection standards across all land use designations for new development. We believe builders and homeowners are ready to adapt to increasing fire risk by using Firewise standards to protect their properties from wildfire. The plan should recommend the adoption and implementation of new Firewise building standards and recommend monitoring the effectiveness of these standards before considering any other limitations on land use. We would also encourage the Gorge Commission to reduce permitting barriers to forest resilience treatments or structural improvements that are designed to reduce fire risk.

The plan identifies transportation emissions as the greatest source of carbon emissions in the NSA, but the Gorge Commission lacks significant authority in this area. Where the Gorge Commission does have authority, we support the removal of any barriers for development of public and private electric vehicle charging stations, including the installation of electric vehicle charging equipment at private dwellings. The Gorge Commission should also support the ability of Gorge residents to reduce their commutes by working from home by removing review requirements for home occupations and removing barriers to broadband development.

One area of transportation where the Gorge Commission may have authority is recreation. Recreation uses currently are a significant contributor to congestion, idling, and emissions. The Gorge Commission should continue to work with regional partners on congestion mitigation and encouraging the use of public transport to recreational sites. But transportation is only one of many ways recreational users impact Gorge resources that will be exacerbated by climate change. Recreational users impact the Gorge's most sensitive lands, impacting streams, critical habitats, and starting fires. We encourage the Gorge Commission to further study the relationship between recreation and climate change in the Gorge and include more discussion on this topic in the Climate Change Action Plan. It would be beneficial to understand how climate change might affect recreational tourism in the Gorge. Will the effects of climate change bring fewer people to the Gorge? Or will more tourists come here because of climate change's more severe effects on other recreational tourist destinations?

Finally, we understand that the Climate Change Action Plan is not a regulatory document, but that it may inform future regulatory Management Plan revisions. Given some of the specific actions recommended in the plan, we are concerned that adoption of the plan will lead to significant Management Plan revisions without the benefit of the same robust public process that previously informed Gorge2020 and other plan revisions. We recommend an incremental approach where smaller steps are taken more immediately and monitored for effectiveness and any substantial changes to land use regulations are only considered during the next ten-year plan review.

Thank you again for providing opportunity to comment on the draft plan and for extending the period to provide comments. We would also like to thank your staff for meeting with us to review and discuss the document and for the work they have put into this effort. Given the



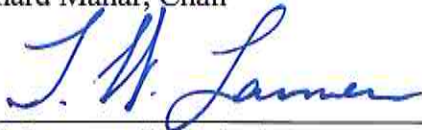
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Columbia River Gorge Commission
August 9, 2022

importance of the Climate Change Action Plan and the level of public interest in this topic, we hope the Gorge Commission will carefully consider public input and release a revised draft for additional public review prior to adoption of the plan.

Sincerely,



Richard Mahar, Chair



T.W. Lannen, Commissioner



Bob Hamlin, Commissioner





August 9, 2022

Chair Robin Grimwade
Vice-Chair Pah-Tu Pitt
Columbia River Gorge Commission
PO Box 730
1 Town & Country Square
57 NE Wauna Avenue
White Salmon, WA

Re: Proposed Columbia River Gorge National Scenic Area Climate Change Action Plan.

Chair Grimwade and Vice-Chair Pitt,

Thank you for the opportunity to provide comments in response to the Columbia River Gorge Commission's proposed Climate Change Action Plan. The Oregon Farm Bureau Federation ("OFB") is the state's largest general agriculture association, representing nearly 7,000 families engaged in farming and ranching.

The Oregon Farm Bureau believes that agriculture is a key part of the climate change solution, not the problem. Studies show that a variety of agricultural practices, such as no-till drilling or the rotation of cover crops, actively sequesters carbon. Indeed, Oregon's rangeland and cultivated cropland practices have enabled us to be one of the top states in the nation for carbon friendly farming practices. However, due to the complexity of farming Oregon's 240 commodities, any work by any level of government to promote climate smart agricultural practices must be voluntary and incentive based. We do not believe that legislation or adopted rules by varying commissions should prescribe or dictate best agricultural practices, or what farming practices may or may not be utilized on land zoned exclusively for farm use. To that end, we have several concerns with the proposed plan.

LIMITING CULTIVATION

Oregon is a specialty-crop state, growing over 240 different commodities that help supply Oregon and the world with food, fiber, and critical cover crops that aid in the health of our soils. Cultivation is frequently used as a tool to combat climate change. We also recognize that when dealing annual crops, there is a frequent need for adaptation for the vitality of the soil.

Throughout the proposed action plan, there are several references made towards the limitation of cultivation (Page 17, 55, 72) with the stated intent to preserve key winter range areas for wildlife. The [Columbia River Gorge National Scenic Area Act](#) was never intended to limit farm uses on land zoned for agricultural use. We believe this plan should eliminate references to the limitation of cultivation.

Any limitations on cultivated agricultural lands on lands zoned for exclusive farm use is fundamentally in conflict with that zoning and the underlying intent of Oregon’s land use planning system, and was not something that we were aware that the Commission was undertaking. The Commission does not have the authority to limit cultivation, and these references must be removed from the plan.

MANAGEMENT PRACTICES FOR NEW AGRICULTURAL USES

Our stated concerns are in reference to the italicized text below:

“Water conservation strategies, frost mitigations, and shifting to hardier crop or livestock varieties are some adaptation strategies producers can use. Incentives and technical assistance programs may offer support to offset landowner operational costs and sustainable practices may be more cost-effective in the long term.” (Page 49)

*“**Climate adaptation emphasis:** Encourage and reduce regulatory barriers to water conservation, regenerative agriculture practices, integrated pest management, and other strategies that build soil health and biodiversity. Consider best management practices or requirements for new agricultural uses. Address impacts from agriculture to protected resources described in this snapshot, particularly water resources and Oregon white oak. Build opportunities for agriculture to provide carbon storage.” (Page 49)*

Oregon’s farmers and ranchers have been doing their part to conserve water and improve soil health for years, and OFB has long supported incentive-based programs to accomplish these goals. In fact, Oregon Farm Bureau recently sent a letter to support the to support the Oregon Department of Agriculture’s application for funds from the USDA Climate Smart Ag Grant Program to develop a program to both fund practices on the ground and create a marketing system that allows farmers and ranchers to better promote the climate smart agriculture work that is already occurring in Oregon. In line with these goals, we would appreciate explicit clarification that these goals are only to be accomplished through voluntary, incentive-based programs.

OHA GREENHOUSE GAS EMISSIONS REPORT

“Although the Commission does not regulate GHG’s, the Commission can support actions that reduce GHG levels in the NSA.” (Page 57)

*“Non-climate factors affecting carbon storage include land use change, timber harvest and forest management, and agricultural practices. These represent opportunity areas for potential Management Plan policies and voluntary, incentive-based approaches.”
(Page 62)*

The proposed action plan used a report from the Oregon Health Authority on Oregon’s greenhouse gas (GHG) emissions to implicate agriculture as a significant source of GHG emissions. In fact, agriculture has one of the lowest emissions profiles of any sector in the United States, and that profile is declining every year.¹ Again, any efforts to reduce agriculture related emissions must be voluntary and incentive based and must recognize the significant barriers to electrification in the agricultural sector.

Sincerely,



Claire Waggoner
Government Affairs Associate
Oregon Farm Bureau

¹ <https://www.fb.org/land/sustainability-in-ag>

August 9, 2022

Columbia River Gorge Commission
PO Box #730
White Salmon, WA 98672

Dear Commissioners,

Thank you for the opportunity to comment on the draft Columbia River Gorge National Scenic Area Climate Change Action Plan. I appreciate the work that has taken place in development of the draft plan, and the subsequent outreach by CRGC staff to discuss our concerns regarding the characterization of agricultural practices and the impact of strategies proposed in the draft.

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 the Soil Health/Carbon Center established at the USDA Agriculture Research Services, Pendleton Agriculture Research Center, the Resilient Dryland Farming activities which identify production practices best suited in dryland wheat areas, and direct investment of producer dollars to University programs to support wheat variety development adapted to changing environments and conditions.

In reviewing the draft plan, the primary concerns are the inclusion of language around limitations to new cultivation and the encouragement of specific conservation practices that may not be aligned to the diversity of lands in the NSA. While the plan is not regulatory, the goals and strategies it sets forth have opportunity to lead to future regulations that would limit agricultural production.

As the Commission reviews the draft plan, I request consideration for the following:

- The plan should acknowledge that agriculture provides a means for mitigating the impacts of climate change and investing to local economies.
- The plan should encourage practices consistent with the local environment, rather than listing limited prescriptive practices. For example, in the ‘carbon storage for habitats and working lands’ goal, the plan encourages the use of cover crops (page 60), which may be effective in intermediate and higher rainfall zones of the scenic area, but challenging for low rainfall areas. Instead, engaging with partners already working in coordination with agricultural producers in the conservation space will ensure practices are adopted that are relevant to the diverse lands in the NSA.
- The plan should consider the farm management practices commonly used by producers when drawing conclusions from broad Oregon and Washington data about the relative sources of GHGs. In the dryland farming areas of the eastern Gorge, low intensity tillage is a widely adopted practice, as are precision agriculture practices.



Cultivation is necessary for a viable agricultural economy. Producers make long term decisions, that often extend beyond the five year window, for planting and cultivation. I look forward to engaging with Commission staff in development of a final plan that can support ag production, lessen the burden to family farm operations, and will engage with working lands in a productive fashion.

Sincerely,

A handwritten signature in blue ink, appearing to read 'AHO', with a large, sweeping flourish at the end.

Amanda Hoey, CEO



KLICKITAT COUNTY
BOARD OF COUNTY COMMISSIONERS



115 W COURT, ROOM 201, GOLDENDALE WASHINGTON 98620 • VOICE 509 773-4612
JACOB ANDERSON, DISTRICT #1
DAVID M. SAUTER, DISTRICT #2
DAN CHRISTOPHER, DISTRICT #3

August 9, 2022

Columbia River Gorge Commission
PO Box #730
White Salmon, WA 98672
(submitted electronically)

Dear Gorge Commissioners and Commission Staff,

Thank you for the opportunity to comment on the Gorge Commission's Draft Climate Change Action Plan (CCAP). We appreciate the Gorge Commission's commitment to acting in the face of climate change. However, Klickitat County does have some concerns about particular CCAP components, as described in more detail below.

Oak Woodlands and Deer/Elk Winter Range

Klickitat County hosts a large percentage of oak woodlands in the Scenic Area. Thus, Klickitat County residents will bear the largest impact of any future land use policy changes tied with oak woodlands.

Klickitat County understands the ecological value of oak woodlands and is generally supportive of their conservation. The County is an active participant in the East Cascades Oak Partnership (ECOP) and has helped to refine and support landowner outreach and communication materials ECOP is developing. However, both as an ECOP participant and in broader policy discussions like the CCAP, Klickitat County advocates for using incentives and voluntary approaches to achieve oak conservation as opposed to regulatory action. We oppose inclusion of the "no net loss" goal for oak woodlands in the CCAP for the reasons documented below, and we urge the Commission to develop alternative strategies for this resource that don't rely on regulatory policy development and compensatory mitigation.

Relative to other vegetation types, oak woodlands habitats are resilient to many climate stressors and are projected to expand their range under future warmer and drier climate conditions (Halofsky et al. *in press*). Implementing a "no net loss" policy for a habitat type that will expand with climate change is counterintuitive and unduly restrictive, particularly given that Oregon White Oaks are not a federally or state threatened and endangered (T/E) species. Oak woodlands are not like wetlands which require specific biophysical features to be present. They are likely to move across the landscape as climate change progresses, which will complicate policy and compensatory mitigation implementation.

Additionally, it appears that the Commission is still gathering critical spatial information related to oak woodlands and deer winter range, and evaluating how that spatial data interacts with climate resilience data and existing land use designations (CCAP pg. 47, 55). Without this data in hand, and particularly without all affected parties being able to review that data, it is premature to set a “no net loss” goal. The data may reveal other, less restrictive opportunities to conserve oaks while supporting other Scenic Area values, such as agriculture and rural economies.

Further, the Commission is still working to “develop tools to assess current condition in various oak system types and learn more about potential future structure and function of these habitats” (CCAP pg. 56). As currently described, the “no net loss” goal applies not only to oak woodland acreage, but to oak woodland function. It again seems premature to set a goal of “no net function loss” and suggest requiring compensatory mitigation when we don’t yet know how to quantitatively evaluate oak condition and function. Klickitat County would appreciate having more detailed discussions about oak woodland protection, compensatory mitigation, how it might function, and how it can best meet the needs of both oak woodlands and rural economies prior to it being formalized as a goal in the CCAP.

Finally, a “no net loss” stance could drive maladaptation by unintentionally restricting opportunities for active management, restoration, and stewardship of existing oak woodlands. As noted, oak stands in the Scenic Area need restoration and active management (CCAP pg. 16). Many restoration activities such as stand thinning and prescribed fire require removal and loss of some individual oaks in order to support a healthier overall oak stand (Halofsky et al. *in press*). A “no net loss policy” restricts management flexibility needed to successfully treat diverse oak stands across the Scenic Area, and causes further administrative hurdles to implementing critical restoration projects.

We urge the Commission to remove the “no net loss” of oak woodlands from the CCAP, and rather, prioritize continued exploration and development of incentive-based approaches. Many Klickitat County citizens care for oak woodlands and protect them on a voluntary basis. Both County and Commission staff play a pivotal role in connecting landowners with resources like ECOP, WA Department of Natural Resources, and Conservation Districts. We urge the Commission to capitalize on the existing stewardship occurring through voluntary means and give this method time to have an impact in this region.

Cold Water Refuge Streams

Klickitat County would appreciate being involved in all future discussions regarding cold-water refuge streamflow and temperature monitoring. The County coordinates the Klickitat Lead Entity for Salmon Recovery,¹ which is a key partner in implementing the Governor’s Salmon Recovery Strategy in the White Salmon and Klickitat basins. Via the Lead Entity process, we have supported voluntary, locally-led fish habitat conservation and restoration projects since 1999, including projects that increase riparian cover and

¹ <https://www.klickitatcounty.org/243/Salmon-Habitat-Recovery>

protect and enhance cold water habitat. We welcome the Commission’s efforts to reduce permitting barriers for these activities. We additionally support the Commission focusing their efforts on ways to enhance cold water tributary confluences through projects that would increase the depth of these confluence pools and thereby provide a larger volume of cold-water for migrating salmonids.

Regarding stream buffers, the 2020 Management Plan Update upgraded buffers for EPA-identified cold-water refuge streams from 100 to 200 feet (CGNSA Management Plan pg. 97), which is consistent with state and federal standards and the best available science. Yet the CCAP suggests “updating Management Plan policies to increase stream buffers” (CCAP pg. 49) as a proposed action. This action is unnecessary given the recent update and high levels of protection already granted to streams. Prior to including this action in the CCAP and/or updating Management Plan policies, we would request clarification on what streams this action is targeting and a clear presentation of what science documents the need for larger-than-existing buffers. Additionally, we’d request a cost-benefit analysis of whether implementing larger buffers in the Scenic Area would actually yield tangible results on stream temperature. For example, in the portions of the Klickitat and White Salmon basins that fall within Scenic Area boundaries, the regulatory need to increase buffers is unnecessary due to topography that prevents development and currently high levels of shading supported by canyon topography and existing forested conditions (EPA 2021).

Klickitat County is also concerned about the Commission’s intention to set summer baseflow and winter high flow goals (CCAP pg. 49). Setting flow goals and using streamflow metrics to drive land use policy may unfairly restrict landowner activities while having a miniscule influence on streamflow patterns. Climate-driven changes such as reduced snowpack and more frequent rain-on-snow events are likely to have the largest influence on streamflow in the White Salmon and Klickitat basins, not human land use (Halofsky et al. *in press*).

Two editorial notes:

- For the summer streamflow graphic (CCAP pg. 10), please include the source of the graphic and consider including river/stream labels for ease of interpretation.
- Please clarify the target date for the goal “summertime water temperatures on NSA CWR streams continue to meet or are trending towards federal/state standards for cold water refuge habitats”. On page 4 and 49, 2030 is listed. On page 69, 2040 is listed.

Setting Numeric Targets Without Baseline Conditions

An overarching concern is that the CCAP appears to be setting quantitative goals before establishing baseline conditions. For example, a stated goal for resilient lands is, “By 2040, 70% of climate resilient lands are protected by land use policies and land use designations” (CCAP pg. 47). But does the Commission know what percentage of climate resilient lands in the Scenic Area are currently protected under existing regulations? Without knowing or having access to data on baseline conditions, it is difficult for Klickitat County to evaluate if stated CCAP goals are 1) necessary and 2)

appropriate in scope and scale. Land use policies have serious implications for land owners and the success of rural livelihoods, so careful, informed coordination is necessary as the Commission seeks to implement climate adaptation goals. Baseline data should be collected first; numeric goal criteria can then be more holistically discussed with partners and incorporated in future CCAP updates.

Maladaptation and Unintended Consequences

A core component of any climate adaption effort is to make sure that suggested policies and actions don't inadvertently *increase* climate vulnerability over the long-term (Schipper 2020; Eriksen et al. 2021) or cause irreparable unintended consequences. We would challenge the Commission that prior to finalizing the CCAP, you spend time evaluating and documenting the maladaptive or possible unintended consequences of CCAP strategies and actions. This might best be done with partners such as Counties and industry leaders who can help identify pinch points where policies intersect with landscape, landowner, and economic realities.

The Commission correctly identifies that climate change disproportionately affects rural communities and those who rely upon natural-resource based economies, in addition to tribal communities and communities of color (CCAP pg. 3; National Climate Assessment [NCA] 2014, 2018). Climate change is expected to shift the locations where rural economic activities can thrive, including agriculture, forestry, and recreation (NCA 2014, 2018). We support inclusion of strategies that reduce barriers to sustaining rural livelihoods and communities, such as permit streamlining. However, some CCAP strategies and actions exacerbate risk to nature-based economies by limiting adaptive capacity and management flexibility. Land use policies and activities like no net loss of oak woodlands and "limiting new cultivation" to protect deer winter range (CCAP pg. 55) make it more difficult for rural economies to adapt, either by outright prohibiting a change in operational location or management practices or by making it too time consuming, complicated, or expensive to navigate the regulatory process. Loss of economic viability on working lands will reduce their capacity to assist with carbon sequestration and increases the risk of conversion to other uses, which often have worse outcomes for wildlife and landscape resilience (Freedgood et al. 2020, Sorenson and Hunter 2020). Enhanced regulatory measures are likely to disincentivize and undermine rural livelihoods, which will make it difficult for the Commission to achieve social and economic resilience within the NSA (goal identified on CCAP pg. 4). Rather we urge the Commission to explore opportunities to co-develop and support voluntary best management practices and/or incentive-based approaches (e.g. see Sorenson and Hunter 2020).

We also urge the Commission to think about maladaptation across a larger scale than just the Scenic Area, and how increasingly restrictive regulatory policies might contribute to regional maladaptation. As a basic example, increasingly restrictive land use policies could drive more people to live outside of the Scenic Area. In Klickitat County, in many cases this would put people even farther from urban centers like White Salmon that provide goods and services, causing more and longer personal vehicle trips and thus more greenhouse gas emissions. We recognize the Commission's focus is on the Scenic Area,

but our landscapes, communities, and economies are intertwined, and Commission policies have implications beyond the mapped boundaries of your jurisdiction. Thank you again for the opportunity to comment. We look forward to continued discussions on these topics.

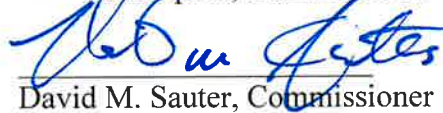
Sincerely,

BOARD OF COUNTY COMMISSIONERS
Klickitat County, Washington


Jacob Anderson, Chairman

Absent

Dan Christopher, Commissioner


David M. Sauter, Commissioner

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August 9, 2022

Columbia River Gorge Commission
% Robin Grimwade, Chair
PO Box 730
White Salmon, WA 98672
(Submitted by email to: ClimateAction@gorgecommission.org)

Re: Draft Climate Change Action Plan

Chair Grimwade, Commissioners and staff:

On behalf of Multnomah County's Department of Community Services and Office of Sustainability, please accept these comments in strong support of the Columbia River Gorge National Scenic Area's (CRGNSA) Climate Change Action Plan (CCAP). As referenced in the CCAP (p33), this critical work is responsive to and builds upon the important climate commitments previously adopted at the federal, state and local level. This includes the long history of action taken by Multnomah County to address climate change and environmental justice, including the adoption of the 2015 Climate Action Plan, the 2018 Environmental Justice Resolution, and strong climate focus in our most recent Comprehensive Plan.

The draft CCAP clearly reflects a tremendous amount of careful thought and effort on the part of Commission staff and the wide range of stakeholders. Overall, the objectives, goals and strategies described are comprehensive, clear, measurable, and impactful. The structure of the CCAP closely aligns with Multnomah County's approach to addressing climate change. This includes the recognition of equity as a core value in climate work, and the prioritization of addressing climate change through both reducing carbon emissions (mitigation) and protecting the region from climate impacts (adaptation/resiliency). With respect to equity in the plan, we especially appreciate the focus on tribal treaty obligations and the intentional consultation with tribal interests in relevant areas (p6). The identification of current work underway by the Commission related to each objective is especially helpful in thinking through the impact of the

CCAP. We found the identification of current work that supports each CCAP priority very helpful in understanding how the CCAP will integrate with the Columbia River Gorge Management Plan. We appreciate the thoughtful consideration of hydroelectric generation (p38), and are eager to work together as we consider how we will achieve our local decarbonization goals in a manner that fully recognizes the impacts of our energy systems on natural and cultural resources. Finally, in our experience a strong evaluation framework that recognizes the need to revise and adapt the plan is critical for the success of long-term planning, especially planning for a risk as dynamic as climate change. The evaluation framework described in the draft CCAP is one of its strongest elements.

We offer some additional elements for consideration either in the CCAP itself or during its implementation. First, the unfortunate reality is that we are collectively responding to the risks of climate change decades too late. As such, we must look at the scale and timing of actions we choose to take in 2022. As the CCAP specifically references (p33), “unless there are immediate, rapid, and large-scale reductions in greenhouse gas emissions” our communities, particularly those least likely to cope, will suffer consequences. While the plan tackles a large scope and suggests a tremendous body of work, we recommend that each goal and action is looked at from the frame of what we need to accomplish by 2030 in order to meet the moment. We understand all too well the realities of being capacity constrained and prioritizing efforts based on the “[f]easibility of achieving the action, given current resources” (p45). We hope that the Commission will pursue a collective impact approach through strong partnership across federal, state and local governments and non-governmental entities in order to help overcome these barriers. In addition, other elements you may want to consider: potential impacts from oil trains traveling through the CRGNSA; impact of black carbon on critical glaciers and snow pack; and a valuation of the natural resources in the gorge as a complex ecosystem service and the commensurate damage from a business as usual scenario. Each of these would help build the case for climate action not only in the CRGNSA, but also at the local, state and federal level in defense of this shared treasure.

Finally, there are some elements of the CCAP that may be problematic and deserve further clarification or attention. First, understanding that the CCAP is enacted by incorporation into the Gorge Management Plan, Multnomah County staff need greater clarity about implementation, particularly when conflicts arise with other strategies in the Management Plan. Related, a primary concern with the plan is the limited visibility into how recommended actions are expected to be implemented by local government. As stated, the focus on incorporating equity into the CCAP is to be commended. However, some of the uses of “opportunity to promote equity” would benefit from an explicit articulation of the particular equity implications of a given climate issue. The CCAP would also benefit from greater specificity in how best to incorporate equity in the related strategies. This could be supported in part with greater consideration of co-benefits that may result from the different actions. Lastly, the complexity of the CCAP, the Gorge Management Plan, and myriad other local and state plans demand deeper partnership and collaboration in order to understand intended and unintended consequences. Multnomah County is eager to work with the Commission and other stakeholders to better understand the alignment and contradictions of plans and address issues before they significantly impact the community members on whose behalf we all serve.

Once again, we appreciate the opportunity to comment on this ambitious and important effort and strongly support its adoption after consideration of the issues we have raised. We look forward to working together on its implementation.

Sincerely,



John Wasiutynski, Director
Office of Sustainability



Jamie Waltz, Director
Department of Community Services



To: Columbia River Gorge Commission
From: Steven D. McCoy, Staff Attorney, Friends of the Columbia Gorge
Re: Comments on Draft Climate Change Action Plan
Date: August 9, 2022

Thank you for the opportunity to comment on the draft Climate Change Action Plan for the Columbia River Gorge National Scenic Area (“CCAP”). Friends of the Columbia Gorge (“Friends”) has reviewed the draft plan and submits the following comments in addition to the comments Friends submitted with the public petition.

First, Friends applauds the Gorge Commission and its staff in the development of a plan that prioritizes specific actions, such as new policies and regulations protecting sensitive resources and reducing greenhouse gas emissions. Adoption of a robust Climate Change Action Plan for the Columbia River Gorge is a vital step toward meeting the daunting challenges posed by climate change.

Friends provides the following comments on the Climate Change Action Plan:

- Friends supports the two objectives of the CCAP – adaptation and mitigation. The Gorge Commission has the authority and existing or potential tools to address both objectives.
- Objective 1: Adapt to Impacts
 - The plan proposes to “[a]ccelerate wetland restoration and enhancement” by creating “options for permit-exempt or streamlined enhancement.” While Friends supports the goal, the devil is always in the details and it will be necessary to very carefully calibrate whatever options are created.
 - Friends concurs that gathering baseline data on wetland extent and condition will be vital to ensuring that wetlands are not damaged or destroyed prior to or during site development.
 - Friends is also heartened that the Commission staff is working with the Treaty Tribes to address tribal treaty rights and culturally important plants.
 - Friends supports advancing the permanent protection of targeted High Climate Resilience Areas (“HCRA”) outside of Urban Areas.
 - Friends applauds the inclusion of climate resilient areas in the CCAP and focused protection on those areas should contribute to building

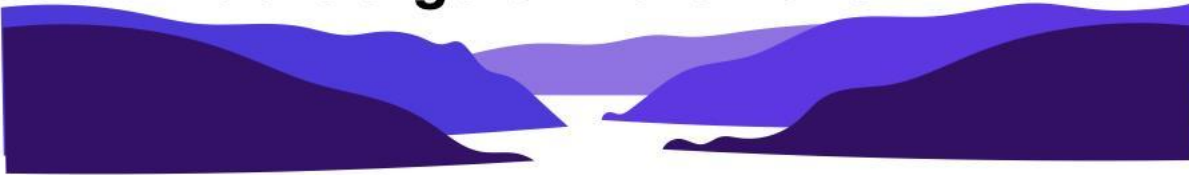
long-term resilience. Given the accelerating impacts of climate change, alongside rapid land development and land conversion in the Gorge, Friends encourages the Gorge Commission to develop a more ambitious goal for the permanent protection of these critical habitat areas. Friends also encourages the Forest Service to embrace land acquisition as a critical strategy in the protection of HCRAs.

- Objective 2: Mitigate Greenhouse Gas Emissions
 - Friends also supports the Commission staff's goal and strategies for regional transportation and reduction of vehicle miles travelled in the Gorge. This is critical not only to protect the natural and scenic resources of the NSA, but also for access to recreation resources.
 - Friends also supports measures, including temporary closures of public lands, to prevent wildfires.
- Friends supports actions for equitable and inclusive climate action work.
 - Friends supports prioritizing culturally important plants in the CCAP. Friends asks the Commission to adopt new policies to protect treaty rights and First Foods and protect tribal treaty rights from the impacts of climate change.
 - Friends also asks the Commission to create and/or support resources and connections for frontline communities – those that experience the first and worst consequences of climate change.

The Gorge Commission staff has already made changes that Friends and other activists have supported and Friends is grateful for the Commission's hard work and dedication to protecting and preserving the Columbia River Gorge.

Thank you for considering these comments and the opportunity to show support for the draft Climate Action Plan for the Columbia River Gorge National Scenic Area. Friends appreciates the work in developing a climate action plan with meaningful actions that increase climate resilience and mitigate GHG emissions in the Gorge.

Columbia Gorge Climate Action Network



August 9, 2022

RE: Climate Change Action Plan

Dear Gorge Commission,

Columbia Gorge Action Network (CGCAN) applauds the immense amount of work the Gorge Commission and its staff have taken to form a plan that helps to move forward mitigation to alleviate the effects of climate change. We are supportive of the measures laid out in the plan that include new policies and regulations that protect areas that are in dire need. We are in agreement that the adoption of the Climate Change Action Plan (CCAP) for the Columbia River Gorge is necessary and is a great step in mitigating the challenges we are facing as a region due to climate change.

We are in support of and suggest:

- A measurable and action-orientated approach to support Tribes through equitable and inclusive climate work. This can be done by adopting new policies that protect treaty rights and First Foods. It is imperative to consult with the Tribes regarding any gaps, measures, and new policies moving forward.
- The importance of salmonid habitat streams, wetland and stream projects. Specifically, increasing protective buffers and facilitating restoration projects. A remaining question is how the Commission will be able to enforce control of flow and temperature. How can this be defined and updated in the Management Plan? Is this in the Commission's purview?
- We are in support of permanent protection of High Climate Resilience Areas (HCRAs) outside of Urban Areas. It is imperative to protect these areas permanently, as the Gorge is seeing many impacts of land development and a changing landscape. We recognize that this protection is necessary; however, we ask that the plan be further developed with appropriate goals for these critical areas.
- We encourage the protection of large scale logging of forests. Currently industrial clear cutting is allowed, which emits monumental amounts of sequestered carbon. We request amendments to be made in the Management Plan to limit large scale clear cutting on lands in particular sensitive lands.
- New residential developments should be restricted with the protection of agricultural lands in place. This can be done by preventing non-farm dwellings on lands suitable for agriculture and forestry. In turn these restrictions and protections would reduce the risk of forest fires in Small Woodland zones.
- Use of transportation for traveling to and from the Gorge is unavoidable which includes daily driving between each community by residents and workers. Each year

there is an increase in traffic by residents and tourists, with more usage in the summer months. It is imperative to advocate and partner with regional transportation organizations to reduce traffic and greenhouse emissions and to promote affordable and regional transportation. We are advocates for regional EV chargers; however, we are unsure if the goals in the CCAP are measurable and attainable. Better analysis and more defined goals are needed. Bicycle infrastructure should be encouraged and promoted.

- Any increase in fossil fuel infrastructure should be prohibited in the Gorge. We request a robust program to significantly reduce the reliance on natural gas.
- Review current population projections and impacts for the Gorge. Given the water shortage and increasing heat in the US Southwest, more people will be moving North. Has this been factored into CCAP planning and the Vital Signs Indicators?
- Work with the Cities and Counties in the Gorge that have already passed Climate Action Plans. Coordinate where possible and act as a regional clearing house and information resource for further climate actions.

We hope that the above statements and requests can help shape the extensive CCAP further. Thank you again to the Gorge Commission and its staff for all of the time, energy, conversations, and work you have put into this plan thus far. We are thankful that the Gorge Commission recognizes that climate change has already greatly impacted the Gorge and is moving forward with putting measurements in place to help reduce further impact in a timely manner.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Strid". The signature is fluid and cursive, with the first name "Eric" written in a larger, more prominent script than the last name "Strid".

Eric Strid
Co-convener, Columbia Gorge Climate Action Network

From: [Stephanie Feldstein](#)
To: [Climate Action](#)
Subject: Climate Action Plan Comment
Date: Tuesday, August 9, 2022 6:19:24 PM

Dear Columbia River Gorge Commission,

Thank you for the opportunity to comment on the Climate Change Action Plan for the Columbia River Gorge. As a Washougal resident, I applaud you for developing a plan to prioritize specific actions to protect this region, reduce greenhouse gas emissions, build resilience, and advance equity and justice.

While many organizations are prioritizing vulnerable populations in their climate plans, gender equity has been left out of the discussion. Including gender-based strategies and solutions in climate plans will provide long-term benefits to people, wildlife and the planet and increase climate resiliency. Therefore it's critical for the Gorge Commission to include gender by creating a task force to engage stakeholders, including people from underserved communities, to collaborate on strategies to meet climate, health and equity goals and beginning to collect relevant data related to gender, race and climate change.

In addition to collecting data, the commission can use this planning process opportunity to highlight gender inequality as a public health issue, make sure women and gender-diverse voices are on planning committees, educate government staff on gender and inclusion, and support gender empowerment programs throughout the climate plan.

Our expert team at Center for Biological Diversity would be happy to provide any additional background information, resources, model language or other assistance to help the commission meet its climate and equity goals.

Sincerely,

Stephanie Feldstein (she/her)
Population and Sustainability Director
Center for Biological Diversity
(734) 395-0770

From: Zottermj@yahoo.com
To: [Climate Action](#)
Subject: Take strong climate action
Date: Wednesday, August 10, 2022 12:01:57 AM

Please take the strongest possible climate action to help protect one of the wonders of the world, the Columbia River Gorge. It will save money in the long run, and we need to protect intact Ecosystems that are collapsing at alarming rates around the world. It's past time to take this seriously, and ignore whatever comments fossil fuel interests or those who do nothing but put their head in the sand about this issue. Thank you for your time and thank you for protecting just nationally recognized area, our Columbia River Gorge.

Sincerely, Mike

Sent from my iPhone

Friends of the Columbia Gorge
280 sign-on supporters (see list below):

Show Support for a Strong Climate Plan!

As supporters of Friends of the Columbia Gorge, we applaud the Gorge Commission and its staff in the development of a plan that prioritizes specific actions, such as new policies and regulations protecting sensitive resources and reducing greenhouse gas emissions. Adoption of a powerful Climate Change Action Plan (CCAP) for the Columbia River Gorge is a vital step toward meeting the daunting challenges posed by climate change.

We hope the following suggestions support specific actions to build climate resilience.

Friends proposes these critical actions in the Climate Change Action Plan:

- We support actions for equitable and inclusive climate action work
 - First Foods
 - Friends supports prioritizing culturally important plants in the climate action plan. Not all traditional foods are protected by the Management Plan. Identifying gaps in protection and adopting new policies is necessary to protect these plants and uphold treaty rights.
 - Adopt new policies to protect treaty rights and First Foods and protect tribal treaty rights from the impacts of climate change.
 - Creating or supporting resources and connections for frontline communities - those that experience the first and worst consequences of climate change.
- We support advancing the permanent protection of targeted High Climate Resilience Areas (HCRAs) outside of Urban Areas
 - We applaud the inclusion of climate resilient areas in the CCAP and focused protection on those areas should build long-term resilience. Given the accelerating impacts of climate change, alongside rapid land development and conversion in the Gorge, Friends encourages the Gorge Commission to develop a more ambitious and appropriate goal for the permanent protection of these critical habitat areas. We encourage the Forest Service to embrace land acquisition as a critical strategy in the protection of HCRAs.
- We support increasing protective buffers around salmonid habitat streams and facilitate wetland and stream restoration projects
 - The current draft states this will require updates to the Management Plan. As this process can be lengthy, we want to emphasize the critical need for these protections.
- We support protecting forests by preventing industrial-scale clear cutting

- Current laws in the Oregon and Washing Forest Practices Acts allow large-scale clearcutting, which releases massive amounts of sequestered carbon. Tens of thousands of acres of forest land in the Gorge are managed as industrial forest lands – even the most highly protected and sensitive lands. We ask the Forest Service and Gorge Commission to address reduced forest cover due to logging practices and make amendments to the Management Plan to limit large clearcuts on sensitive lands.
- Convene interested parties to develop climate-smart forestry rules for the General Management Areas promoting healthy forests, increasing biodiversity, and enhancing carbon sequestration!
- We support protecting agricultural lands and preventing wildfires by restricting new residential development
 - Prevent non-farm dwellings on lands suitable for agriculture.
 - Reduce the risks of forest fires by restricting new residential development in Small Woodland zones.
- We support promoting regional transportation solutions reducing greenhouse gas emissions
 - Support efforts to create a regional transportation authority to develop a Gorge-wide transit plan to provide regional transportation options that are affordable and reduce carbon emissions.
- We support prohibiting the expansion of fossil fuel infrastructure in the Gorge, such as natural gas transmission and distribution. Reducing reliance on natural gas is an effective mitigation measure for fighting climate change.

The Gorge Commission has already made many of the changes Friends’ activists have advocated for, and we are grateful for their hard work and dedication to protecting and preserving the Columbia Gorge.

Thank you for considering these comments and the opportunity to show support for the draft Climate Action Plan for the Columbia River Gorge National Scenic Area. We appreciate the work in developing a climate action plan with meaningful actions that increases climate resilience in the Gorge.

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Linda	Browning	Beaverton	OR
Cory	Buckley	Tigard	OR
William	Burns	The Dalles	OR
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Michael	Wolf	Portland	OR
Karen	Wood	Vancouver	WA
Paula	Wood	Wood Village	OR
Sara	Woods	Hood River	OR
Marlene	Woodward	Husum	WA
Steven	Woolpert	White Salmon	WA
Jerry	Zaret	Portland	OR