



## AGENDA: SPECIAL SESSION

MONDAY, JUNE 21, 2022

WASCO COUNTY BOARD OF COMMISSIONERS

<https://wascocounty-org.zoom.us/j/3957734524> OR Dial [1-253-215-8782](tel:1-253-215-8782) Meeting ID: 3957734524#

While these virtual options are provided, we cannot guarantee connection or quality of the call.

511 Washington Street, Suite 302, The Dalles, OR 97058

**PUBLIC COMMENT:** *Individuals wishing to address the Commission on items not already listed on the Agenda may do so during the first half-hour and at other times throughout the meeting; please wait for the current speaker to conclude and raise your hand to be recognized by the Chair for direction. Speakers are required to give their name and address. Please limit comments from three to five minutes, unless extended by the Chair.*

**NOTE:** With the exception of Public Hearings, the Agenda is subject to last minute changes; times are approximate – please arrive early. Meetings are ADA accessible. For special accommodations please contact the Commission Office in advance, (541) 506-2520. TDD 1-800-735-2900. If you require and interpreter, please contact the Commission Office at least 7 days in advance.

*Las reuniones son ADA accesibles. Por tipo de alojamiento especiales, por favor póngase en contacto con la Oficina de la Comisión de antemano, (541) 506-2520. TDD 1-800-735-2900. Si necesita un intérprete por favor, póngase en contacto con la Oficina de la Comisión por lo menos siete días de antelación.*

<b>10:00 a.m.</b>	<b>CALL TO ORDER</b>
<b>10:00 a.m.</b>	<a href="#">Climate Change Action Plan</a> – Kelly Howsley-Glover
<b>10:20 a.m.</b>	<a href="#">Executive Session</a> – Pursuant to ORS 192.660(2)(i) Performance Evaluations of Public Officers
	<b>COMMISSION CALL</b>
	<b>NEW/OLD BUSINESS</b>
	<b>ADJOURN</b>

If necessary, an Executive Session may be held in accordance with: ORS 192.660(2)(a) – Employment of Public Officers, Employees & Agents, ORS 192.660(2)(b) – Discipline of Public Officers & Employees, ORS 192.660(2)(d) – Labor Negotiator Consultations, ORS 192.660(2)(e) – Real Property Transactions, ORS 192.660(2)(f) To consider information or records that are exempt by law from public inspection, ORS 192.660(2)(g) – Trade Negotiations, ORS 192.660(2)(h) - Conferring with Legal Counsel regarding litigation, ORS 192.660(2)(i) – Performance Evaluations of Public Officers & Employees, ORS 192.660(2)(j) – Public Investments, ORS 192.660(2)(n) –Security Programs, ORS 192.660(2)(n) – Labor Negotiations



**WASCO COUNTY BOARD OF COMMISSIONERS  
SPECIAL SESSION**

**JUNE 21, 2022**

**Room 302, Wasco County Courthouse**

This meeting was also held on Zoom

<https://wascocounty-org.zoom.us/j/3957734524>

or call in to [1-253-215-8782](tel:1-253-215-8782) Meeting ID: **3957734524#**

**PRESENT:** Kathy Schwartz, Chair  
Steve Kramer, Vice-Chair  
Scott Hege, County Commissioner

**STAFF:** Kathy Clark, Executive Assistant

**ABSENT:** Tyler Stone, Administrative Officer

Chair Schwartz opened the session at 10:02 a.m.

Chair Schwartz opened the floor to public comment; there was none.

**Agenda Item – Columbia River Gorge Commission Climate Change  
Action Plan**

Planning Director Kelly Howsley-Glover explained that the Columbia River Gorge Commission released a draft of the plan in April. She has submitted comments as Planning Director. The Board may want to submit a letter as well. In the packet is a summary, a copy of her letter and draft letter for the BOC to consider submitting.

Chair Schwartz stated that she has read the comments and had some opportunity to read the plan. She said she is not quite ready to submit a letter as she does not fully understand the issues. She stated that the CRGC is willing to extend public comment to August 9<sup>th</sup> which will give them some time to present the plan to Board at a future meeting. Klickitat and Skamania Counties have already had the presentation. She suggested that a presentation would go a long way in being able to engage on some of the issues she does not understand and allow us to directly comment to the CRGC.

Ms. Howsley-Glover asked if the CRGC has verified the extension of the

comment period; they expressed the intent to adopt the Plan in August.

CRGC Executive Director Krystyna Wolniakowski said that the extension was verified at a meeting of the CRGC Executive Committee this morning; the Plan will be reviewed and possibly adopted in October which will give them time to digest and address comments. She thanked Ms. Howsley-Glover for the good points made in her letter; they are meeting with her next week to review those comments. She said she thinks we will have a more robust discussion if they can present to the Board of Commissioners. The Plan is not a regulatory document but rather a way to address actions outlined in the Management Plan.

Commissioner Hege asked for more explanation of the statement that the Action Plan is not a regulatory document. Ms. Wolniakowski responded that it sets out goals and outcomes but does not create new policy; it is aspirational as to what they can do and what they can support that others are doing.

Columbia River Gorge Commission Vital Signs Indicators Planner Lisa Naas said there are some actions that will set staff to do more policy work. The only way those policies can go into effect is if the Management Plan is updated. The Action Plan sets priorities for staff. Anything that would be policy work going forward would have an engagement period and public comment. Being able to talk to counties now is an advantage.

Vice-Chair Kramer said he would reserve any comment to a future meeting. He reported that the Board received related correspondence from a constituent just moments before the start of this morning's meeting.

Commissioner Hege thanked Ms. Howsley-Glover for the work she did on her comments letter; it is an amazing amount of information and the gathering of information was very impressive.

Further discussion ensued and the group agreed to schedule a CRGC presentation for the July 20<sup>th</sup> session of the Board of County Commissioners.

#### The Dalles Chamber Election

Ms. Clark explained that while she was on vacation, The Dalles Chamber ballot arrived for the election of Board members; the deadline for voting is today.

**\*\*\*The Board was in consensus to authorize Vice-Chair Kramer to cast the**

**County's ballot for The Dalles Chamber of Commerce Board of Directors as he serves as an ex-officio member on that Board.\*\*\***

**Executive Session – Pursuant to ORS 192.660(2)(i) Performance Evaluations of Public Officers**

Chair Schwartz opened an Executive Session at 10:21 a.m.; she explained the process and directed media to not report on anything discussed in Executive Session except to state the topic of the session as previously announced.

The Special Session resumed at 11:02 a.m.

**Commission Call**

Vice-Chair Kramer announced that there is an AOC Health and Human Services meeting Friday at 3:00 p.m. Mental and Behavioral Health should be on the agenda.

Commissioner Hege reported that he and Vice-Chair Kramer attended the AOC Legislative Retreat; it was good to be able to network with Commissioners from other counties but the retreat was not as well attended as he had hoped.

Commissioner Kramer said that he thought the relationships that are moving forward in that committee is a bonus. He said he has been attending nearly all of the meetings and seen the tension; some of that was not apparent at this meeting which is encouraging. We are on the right track to be able to have those hard conversations with direction on how we approach issues. He called out one conversation in particular where the common theme was that we have more in common than we don't have in common. Commissioner Hege agreed, saying that the biggest disappointment was the lack of attendance.

Commissioner Hege announced that Mid-Columbia Center for Living has hired Al Barton as their Executive Director. He said that they still need to get a Finance Director. As far as staffing, they have hired 7 with 3 more offers out and no further resignations. He believes they are down to 12-15 vacancies.

Chair Schwartz adjourned the meeting at 11:17 a.m.

Summary of Actions

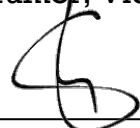
**CONSENSUS**

- **To authorize Vice-Chair Kramer to cast the County's ballot for The Dalles Chamber of Commerce Board of Directors as he serves as an ex-officio member on that Board.**

Wasco County  
Board of Commissioners

  
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Kathleen B. Schwartz, Commission Chair

  
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Steven D. Kramer, Vice-Chair

  
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Scott C. Hege, County Commissioner



## **AGENDA ITEM**

### **Climate Change Action Plan**

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[STAFF MEMO](#)

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[LETTER FROM PLANNING DIRECTOR](#)

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[PROPOSED LETTER FROM BOARD OF COMMISSIONERS](#)

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## MEMORANDUM

**SUBJECT: Columbia River Gorge National Scenic Area Climate Change Action Plan**

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TO: BOARD OF COUNTY COMMISSIONERS, TYLER STONE

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FROM: KELLY HOWSLEY-GLOVER, PLANNING DIRECTOR

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DATE: 6/21/2022

The Columbia River Gorge Commission identified the need, during Gorge 2020, for separate climate change and diversity, equity, and inclusion plans. On April 27<sup>th</sup>, CRGC staff shared a draft of the climate change action plan. The draft was presented, with public comment, to CRGC on June 14<sup>th</sup>. The written comment period ends on July 5<sup>th</sup>. I understand from CRGC staff the intent is to work towards adoption in August.

I sent a comment letter, including input from various partners, ahead of the June 14<sup>th</sup> meeting. My letter identified several areas that deserved additional consideration. I also made some recommendations for strengthening the document, based on input from Planning staff and various stakeholders. The categories of focus for my comments include: impacts to agriculture; impacts to forestry; improving obstacles to forest resilience by reducing permitting barriers; recreation impacts to and impacts by climate change; resource protections (including streams/riparian/waterways, oak woodlands, and deer and elk); additional criteria for UGB/UGA expansions, and methodological concerns.

I have prepared a brief letter from the BOCC that focuses on high level challenges and opportunities with the plan. This can be expanded or contracted as the BOCC directs.

It is my understanding Multnomah County and Hood River County, given the constraints with the amount of time offered for comment, will be submitting individual letters from each Commissioner and comment separately from the Planning Director.



June 13, 2022

Columbia River Gorge Commission  
PO Box #730  
White Salmon, WA 98672  
(Sent by email to [connie.acker@gorgecommission.org](mailto: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; Hewer, 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.

Kelly Howsley Glover  
Wasco County Planning Director



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June 21, 2022

Columbia River Gorge Commission  
PO Box #730  
White Salmon, WA 98672  
(Sent by email to [connie.acker@gorgecommission.org](mailto: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. We appreciate CRGC's work to improve our local resiliency, and have several recommendations for ways to improve the draft.

First, we feel it is important to have the VSI monitoring model and climate resiliency data completed and available for public review prior to adopting the draft Climate Change Action Plan. The ability of stakeholders and citizens to provide clear input is limited without fully understanding the framework for future policy or decision making.

Second, we would encourage CRGC to spend more time prior to adoption soliciting input from key partner agencies and subject matter experts. Several of the recommended policies will have far reaching impacts to not only economic sectors like agriculture, forestry, and tourism, but also resource protections. The statewide planning system has, as a foundation, state agency coordination that can be leveraged to ensure drafted concepts are vetted by experts across the various disciplines.

Third, the proposal to add criteria to a UGB expansion needs to be more carefully examined in light of Gorge 2020 work. As with the VSI methodology and climate resilient lands, it is not clear what equity impacts or thresholds for greenhouse gas emissions are proposed as new criteria for potential UGB expansion.

Finally, we support 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 removing full scenic area review constraints, including time and money, from the overall process to permit these critical projects.

Thank you for your consideration.



## AGENDA ITEM

### Executive Session

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[PURSUANT TO ORS 192.660\(2\)\(I\) PERFORMANCE REVIEW OF PUBLIC OFFICERS](#)

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[NO DOCUMENTS HAVE BEEN SUBMITTED FOR THIS ITEM – RETURN TO AGENDA](#)

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