

February 1, 2024

Regional Forester, Jacqueline Buchanan
USDA Forest Service, Pacific Northwest Region
1220 SW 3rd Avenue
Portland, Oregon 97024

Subject: Columbia River Gorge Commission's Comments on Amendment Process for 1994 Northwest Forest Plan (NWFP)

Dear Regional Forester Buchanan:

I am writing to provide comments on the amendment process for the 1994 Northwest Forest Plan (NWFP) initiated by the USDA Forest Service's Pacific Northwest and Pacific Southwest Regions. I serve as the Executive Director for the Columbia River Gorge Commission, a bi-state compact agency that co-manages the Columbia River Gorge National Scenic Area with the USDA Forest Service.

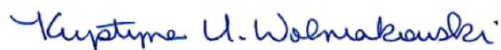
The Gorge Commission's mission is to protect and enhance the scenic, natural, cultural, and recreation resources, and support local economies, of the Columbia River Gorge National Scenic Area. We develop and administer land use and development policy for the National Scenic Area across portions of six counties in Oregon and Washington. Through collaboration with the USDA Forest Service and many agency, tribal, non-profit, and community partners over the past two years, we have launched two Commission initiatives, the Climate Change Action Plan and Vital Sign Indicators (VSI) Monitoring Program, with priorities that overlap with the four amendment focus areas identified in the NWFP scoping notice. Below are a few considerations we hope you will incorporate in your amendment process based on these shared priorities.

- **Fire Resistance and Climate Resilience:** Improving forest and community resilience in the face of increased wildfire and other climate change impacts is a priority in both our climate action and VSI monitoring efforts. We support focusing on management approaches that integrate ecological and community resilience in the NWFP amendment process. In particular, we encourage the planning team to integrate traditional knowledge and Tribal priorities throughout the updated NWFP, rather than as a specific focus under a cultural or socio-economic analysis portion of the Draft EIS.
- **Mature and Old-Growth Forest Management:** Mature and old-growth forests provide critical wildlife habitat and carbon sequestration benefits in a changing climate. These forests are one of the diverse habitats in the National Scenic Area. We support careful consideration of both traditional knowledge and evolving ecological data over the past 30 years when revising strategies for conservation and sustainable use of mature and old-growth forests.

- **Community and Economic Considerations:** While the USDA Forest Service does not have a timber target in the Columbia River Gorge National Scenic Area, they are responsible for meeting multiple management objectives including habitat enhancement, fuels reduction, and diverse recreation experiences. We support thorough consideration of the complex community and economic factors at play on national forests in the Pacific Northwest, in particular identifying strategies for recreation management that effectively address environmental and human health impacts of unmanaged recreation use, such as unauthorized trails and dispersed camping.
- **Wildlife Habitat Protections:** Wetlands and cold water refuge streams are two habitat priorities in our Climate Action and VSI programs based on their ecological value, cultural importance for Tribes, and high vulnerability to climate changes such as drought and warming water temperatures. Along with focusing on mature and old-growth ecosystems, we suggest incorporating climate adaptive management approaches that protect and restore wetlands and cold water refuge streams within forested ecosystems of all age classes.

Thank you for the opportunity to provide comments on the Northwest Forest Plan amendment process during this public scoping period. We look forward to reviewing the Draft Environmental Impact Assessment when it is available and providing more detailed comments at that time. Please feel free to contact me with any questions about these comments. I can be reached at Krystyna.wolniakowski@gorgecommission.org or 509-713-9623.

Sincerely,



Krystyna U. Wolniakowski, Executive Director

c: Carina Miller, Chair, Columbia River Gorge Commission

About the National Scenic Area: *The Columbia River Gorge National Scenic Area was created by Congress in 1986 as the largest national scenic area in the nation covering 292,500 acres in Oregon and Washington and spanning 85 miles of the Columbia River. The governing body, the Columbia River Gorge Commission, was created as a bi-state compact agency in 1987. Our mission is to protect and enhance the scenic, natural, cultural, and recreation resources, and support local economies, of the Columbia River Gorge National Scenic Area. We develop and administer land use and development policy for the National Scenic Area across portions of six counties in Oregon and Washington. The work of managing this complex landscape relies upon strong partnerships with the four Columbia River Treaty Tribes, six Gorge counties, thirteen Urban Areas, USDA Forest Service, and many more partners. The Gorge Commission is responsible for upholding the Treaty Rights of the Columbia River Treaty Tribes in managing the National Scenic Area. These Tribes include the Confederated Tribes of Warm Springs, the Confederated Bands and Tribes of the Yakama Nation, the Confederated Tribes of the Umatilla Indian Reservation, and the Nez Perce Tribe.*