

**TO:** Columbia River Gorge Commission

**FROM:** Lisa Naas Cook, Climate Program Manager, Columbia River Gorge Commission  
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**DATE:** July 8, 2025

**RE:** **Work Session\*:** Staff Assessment of Oak Policy Issues in the Columbia River Gorge National Scenic Area: Overview of Key Themes and Commission Discussion

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## **Purpose**

This memo provides brief background on the attached Staff Assessment of Oak Policy Issues in the Columbia River Gorge National Scenic Area. The purpose of this assessment is to summarize key planning needs, challenges, and opportunities reported by planning staff when implementing Management Plan provisions for Oregon White Oak Woodlands in the National Scenic Area. This assessment supports our Climate Change Action Plan goal to develop Oregon white oak policy options for Commission consideration by the end of 2025. It is intended to provide background on the current policy environment and important planning issues to inform future discussion of policy topics to prioritize for the next Management Plan review. Staff welcomes questions and feedback on this assessment during the July 8<sup>th</sup> Commission meeting.

## **Oregon White Oak Woodlands: A Gorge Commission Priority**

Oregon white oak woodlands are important for wildlife, Indigenous cultural practices, local economies, recreation, and the scenic landscape character of the National Scenic Area. These habitats are some of the most biodiverse, fire adapted, and climate resilient ecosystems in the Gorge. At the same time, oak systems continue to face the potential for development impacts and land use change. Oregon white oak's native range extends from southern British Columbia to northern California on the west side of the Cascades and into the Columbia River Gorge and East Cascades region. This species' extent has declined significantly from its historic range due to land conversion, fire suppression, and competition from other trees.

Protecting Oregon white oak habitat is a priority across the Commission's work. Oregon white oak woodlands are a priority in the Climate Change Action Plan and a priority habitat in General Management Area (GMA) and Special Management Areas (SMA) provisions in the Management Plan. Oak habitats comprise many of the areas that Oregon and Washington wildlife agencies identify as important deer winter range and therefore receive special provisions in the Management Plan. Supporting Tribal Treaty Rights, specifically strengthening First Foods protection and access

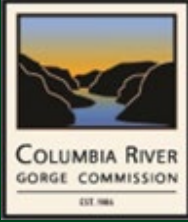
in habitats such as oak, is a Commission priority. To help assess how well we are protecting oak habitats and what land use changes are impacting them over time, Oregon white oak woodlands are also a part of the Vital Sign Indicators (VSI) monitoring program. VSI data, along with the findings of this assessment, can help inform future analysis and policy work as part of the next Management Plan review.

### **Guide to the Assessment Report**

Over the last year, staff held several work sessions with planning staff from the six National Scenic Area counties, USDA Forest Service, and Gorge Commission to discuss the main issues they encounter in their work reviewing development proposals in oak habitat. The heart of this assessment is a summary of themes that emerged from conversations with planners. Before discussing these themes, an overview of the importance of oak habitats, regional impacts, and relevant Management Plan policies are provided as context. The assessment concludes with discussion of potential planning and policy improvements and a list of actions for the Commission to discuss in more depth at a work session this fall.

### **Questions for Commission Discussion**

- As you review the policy background and key themes in this assessment, what most stands out, resonates, or surprises you?
- What additional information would be helpful for you to discuss oak policy options in more detail during a work session later this year?



# Climate Change Action Plan Priority: Oregon White Oak Woodlands

## Staff Assessment of Oak Policy Issues

July 8, 2025

## Table of Contents

- I. Overview
  - A. Oregon White Oak Woodlands: Climate Change Action Plan Priority
  - B. Assessment Objectives and Process
- II. Policy Background
  - A. Oak Habitat Values and Impacts
  - B. National Scenic Area Management Plan Oak Provisions Relating to Oak Habitat
  - C. National Scenic Area Act Requirements Regarding Forest Land
- III. Summary of Themes
  - A. Removal of Oaks and Forest Conversion Requiring Mitigation
  - B. Definitions in the Management Plan
  - C. Information and Education for the Public, Landowners, and Planners
  - D. Oak Habitat Enhancement
- IV. Potential Planning and Policy Improvements
- V. Summary Table of Possible Actions
- VI. Next Steps
- VII. Resources Reviewed for this Assessment

## I. Overview

The purpose of this assessment is to summarize key planning needs, challenges, and opportunities reported by planning staff when implementing Management Plan provisions for Oregon White Oak Woodlands in the Columbia River Gorge National Scenic Area. To meet the 2025 Climate Change Action Plan goal regarding oak policy options for Gorge Commission consideration, it is first necessary to understand the current policy environment and important planning issues. Staff intends this document to help inform conversations with interested parties and the Gorge Commission to identify oak policy areas to prioritize for the next Management Plan review. It includes a list of recommended policy areas for work in coming years. These policy areas support two complementary approaches to protecting and enhancing oaks in the National Scenic Area: (1) protect oak and oak habitats in the context of development and (2) improve efficiencies, fairness, and outcomes in permitting.

Staff acknowledges that any future policy development work the Commission prioritizes will require public engagement, analysis of impacted groups, and consideration of implementation feasibility factors.

## A. Oregon White Oak Woodlands: Climate Change Action Plan Priority

The Columbia River Gorge Commission's Climate Change Action Plan establishes goals, strategies, and key actions for ten priority topics. Oregon white oak woodlands are included as a climate action priority with two goals summarized here:

1. By 2025, comprehensive oak maps including critical habitat corridors are available and oak policy options are provided to the Commission.
2. By 2030, based upon information generated through Goal 1, Oregon white oak woodlands and corridors in the National Scenic Area are maintained or improved.

Commission staff work with the USDA Forest Service and other federal and state agencies, the Columbia River Treaty Tribes, counties, and many other community partners to accomplish the goals within this Action Plan. To address Goal 1, staff are working with regional experts and local partners to map oak habitats and provide policy options to the Commission.

Commission policies in the Management Plan may be non-regulatory or regulatory and inform long-range planning and land use permitting in the National Scenic Area. In the Climate Change Action Plan, actions to “develop policy options” are intentionally broad to allow the Commission to consider if, and how, it might adapt existing policies or develop new programs, policies, or guidelines. Any policy options that are developed as a result of the recommendations in this report must go through a public process as part of Management Plan revision to take effect as new policies.

## B. Assessment Objectives and Process

The following are staff's main objectives for this assessment:

- Engage key planning entities to describe needs and issues that arise when completing development reviews in oak habitats.
- Provide a status update on existing and in-progress oak habitat map resources.
- Identify opportunities to improve implementation of current Management Plan oak policies through policy guidance, best management practices, maps, and partner coordination.
- Suggest oak policy areas for the Commission to consider and prioritize in preparation for the next Management Plan review.



## Process and Timeline

**June–August 2024:** Initial staff work sessions with Forest Service, Gorge Commission, and National Scenic Area county planners to identify needs and issues they encounter when reviewing development proposals in oak habitat.

**September 2024–February 2025:** Staff coordination with Forest Service, East Cascades Oak Partnership (ECOP), and WA and OR state wildlife agencies to compile and review available oak management guidance and map data.

**March 2025:** Staff overview of Oregon white oak as Commission priority with guest presentation from ECOP on importance of oak habitats in the Gorge.

**Spring 2025:** Staff outreach to county planning departments, ECOP, and state wildlife agency staff to gather feedback on the draft oak assessment.

**July 2025:** Staff summary of oak assessment findings to Commission.

**Summer 2025:** Staff refines policy options and recommendations, incorporating Commission input.

**Fall 2025:** Staff provides policy options and recommendations for Commission discussion. Commission shares input with Executive Director to inform staff priorities for 2026 work planning and future Management Plan review process.

## II. Policy Background

### A. Oak Habitat Values and Impacts

Oak habitats are important for wildlife, Indigenous cultural practices, local economies, recreation, and the scenic landscape character of the Columbia River Gorge National Scenic Area. Columbia Land Trust is the fiscal and administrative sponsor of the East Cascades Oak Partnership (ECOP), a collaborative group of agencies, non-governmental organizations, researchers, and private landowners working together to conserve Oregon white oak systems and encourage sustainable human interactions across the East Cascades ecoregion including the Columbia River Gorge. The ECOP Strategic Action Plan 2020-2030 summarizes the interconnected values associated with oak systems:

Oaks provide shade in harsh environments for people and livestock, exhibit hardiness in response to fire and grazing, support First Foods important to indigenous peoples throughout the region, and abundant game species like deer, elk and turkey. Their trunks are energy-rich, dense wood that make excellent firewood, whiskey barrels, and strong boards, their fire-resistant crowns grow acorns that feed people and wildlife, house an abundance of birds that fill our skies with song, shade wildflowers that feed important pollinators, and sequester carbon less vulnerable to release during wildfires. They provide a beautiful backdrop for popular mountain biking and hiking trails that are at the heart of our tourism



economy, are inspiration for artists and philosophers, and provide a fascinating landscape for curious minds to explore. Their natural fire resistance can be a buffer against catastrophic wildfire. (11)

### Oak Habitats as a Gorge Commission Priority

Oregon White Oak Woodlands are a priority within the Gorge Commission’s Climate Change Action Plan and a Priority Habitat in General Management Area (GMA) and Special Management Areas (SMA) provisions in the Management Plan. Oak habitats comprise many of the areas that Oregon and Washington wildlife agencies identify as important deer winter range and therefore receive special provisions in the Management Plan. These habitats also support First Foods, essential for Tribes’ traditional cultural practices. Supporting Tribal Treaty Rights, specifically strengthening First Foods protection and access in habitats such as oak, is a Commission priority across all our work. To help assess how well we are protecting oak habitats and what land use changes are impacting them over time, Oregon white oak is part of the Vital Sign Indicators (VSI) monitoring program as well.

In addition to the many ecological and cultural values in oak systems, oaks are resilient to wildfire and drought. The extent of oak systems in the NSA is expected to increase in a changing climate (Halofsky et. al 2022). Oak also overlaps with terrestrial areas best suited to provide opportunities for wildlife to move and adapt in a changing climate. These High Climate Resilient Areas, identified using The Nature Conservancy’s terrestrial climate resilience model data, are also a priority in the Climate Change Action Plan. Currently, Oregon white oaks are found in all six National Scenic Area counties, with the large majority of oaks located in Klickitat and Wasco Counties.

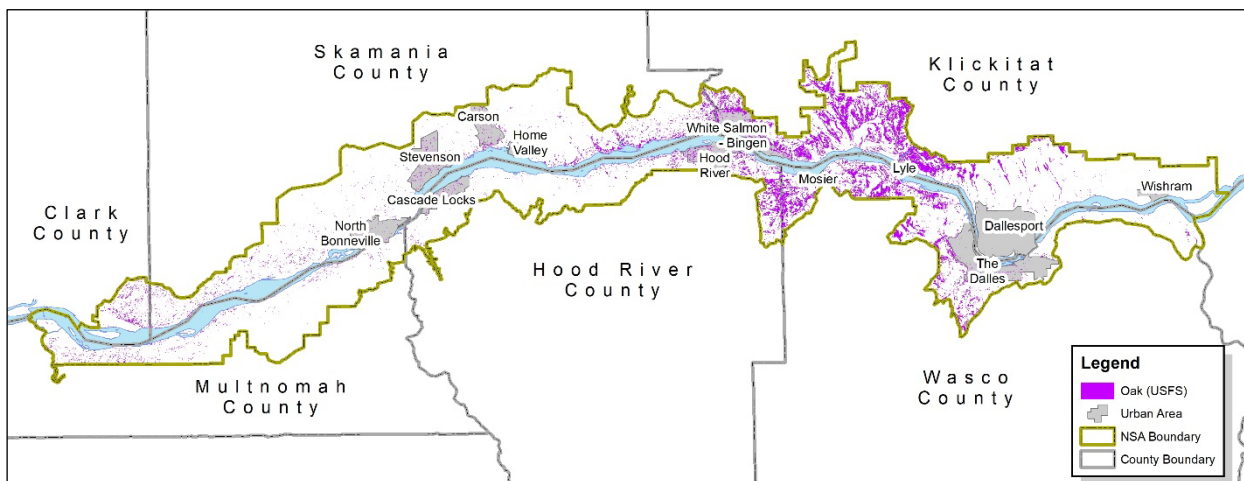


Figure 1. Estimated extent of Oregon white oak in the Columbia River Gorge National Scenic Area. Map created by Commission GIS staff using USDA Forest Service Special Habitats Map (2025).

County	Oak Acreage in NSA by County	Percentage of Total Oak in NSA by County
Klickitat	8,375	47%
Wasco	4,679	26%
Skamania	2,002	11%
Hood River	1,706	10%
Multnomah	523	3%
Clark	422	2%
Total in NSA	17,707	100%

Figure 2. Estimated oak extent in the Columbia River Gorge National Scenic Area occurring in each county as acreage and percentage of total oak. Data compiled by Commission GIS staff using USDA Forest Service Special Habitats Map (2025).

### Impacts to Oak Habitat

Within its strategic plan for 2020-2030, ECOP ranks the primary human interactions impacting oaks from “High” to “Low” based on scope, severity, and irreversibility (ECOP Strategic Plan 45). Human interactions range from rural residential development to grazing to recreational use. Fire suppression/fir encroachment and rural residential development were the two highest ranked threats to oak habitats in this region. Fire suppression and conifer encroachment rank high because fire suppression and lack of prescribed fire lead to conifer-dominated forests in the absence of natural fire regimes that oak require to thrive. Rural residential development ranks high because it often involves removing oaks for homesites and associated infrastructure, fragmenting oak habitats, increasing fire suppression, and introducing invasive weeds.

ECOP reviewed the strategic plan in 2025 and generally acknowledged that these stressors remain priorities. However, they suggest the scale of stressors has changed. Widespread pine mortality and accumulation of dead material has increased, leading to declining forest health and increased fire risk across the region.

Grazing, conversion to conifer plantations, and conversion to orchards and vineyards are other human interactions ECOP ranks along the High to Medium impact continuum based on where they occur across the drier or wetter extent of the East Cascades. In the National Scenic Area, planners report few applications for new grazing uses over the past two decades.



Much of the oak extent in the National Scenic Area overlaps with developable lands that could be cleared for a number of purposes including forest practices, new agricultural uses, and homesites. Land use designations identify what uses are allowed in what locations within the National Scenic Area. Three main land use designations allow uses that have the potential to impact oak habitat: Forest, Agriculture, and Residential. The two figures below highlight how current oak extent overlaps with these land use designations.

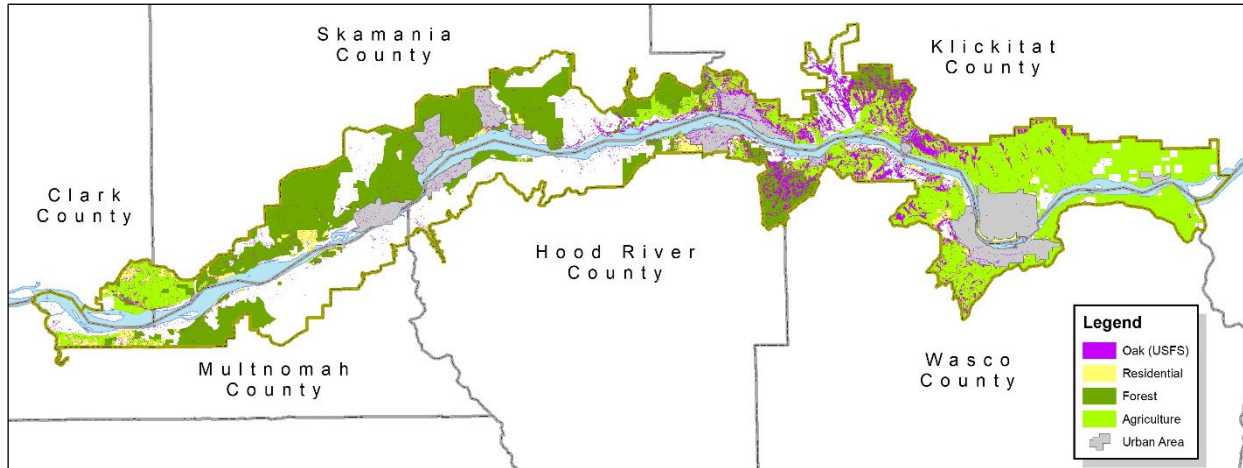


Figure 3. Estimated oak extent by residential, forest, and agriculture land use designation. Map created by Commission GIS staff using USDA Forest Service Special Habitats Map (2025).

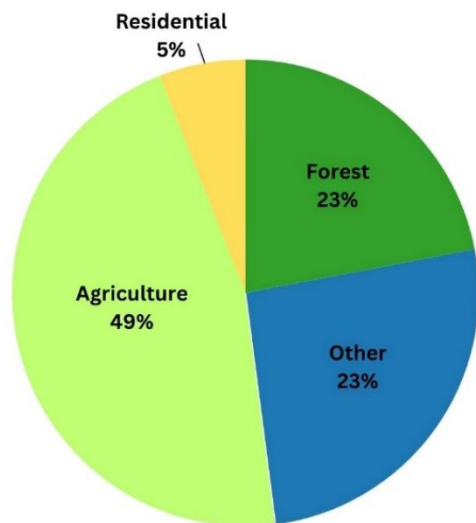


Figure 4. (Left) Estimated percentage of oak by residential, forest, and agriculture land use designations across National Scenic Area counties. “Other” land use designations primarily include Open Space areas.

Thoughtful land use planning can guide where and how different types of development and land uses occur, so that healthy oak systems remain in the future. For our Forest Service partners in the Columbia River Gorge National Scenic Area, oak systems also represent priority areas for habitat enhancement and fuels reduction efforts, as they implement the Wildfire Crisis Strategy for the Mount Hood Forest Health and Fire-Resilient Communities

priority landscape which includes portions of the CRGNSA in Hood River and Wasco Counties.

## B. National Scenic Area Management Plan Provisions Relating to Oak Habitat

The Columbia River Gorge National Scenic Area Management Plan describes allowed uses, review uses, and resource protection provisions that apply in certain circumstances for proposed development and land uses within oak habitat. Policies in the Management Plan describe each unique land use designation to allow or prohibit various types of development. Resource provisions apply in defined circumstances to protect or enhance scenic, natural, cultural, and recreation resources. Below are some of the key Management Plan sections that relate to oak protection and enhancement.

- **Natural Resources Provisions, Wildlife and Priority Habitats [Part I, Chapter 3]:** Many review uses are subject to natural resources provisions for water resources, wildlife and habitats, and plants. Applications for these review uses that include development impacting oak, oak habitat, or specific wildlife or rare plant species within oak habitats require some level of survey, avoidance or mitigation, and monitoring.
- **Oak Removal [Part I, Chapter 3]:** The Management Plan encourages avoidance and mitigation for the removal of Oregon white oak. GMA Guidelines: Wildlife Habitat, Approval Criteria for Review Uses Near Priority Habitat and Sensitive Wildlife Sites, Guideline 2 states, “Oregon white oak shall not be removed if practicable alternatives exist. If no practicable alternative exists, a wildlife survey and mitigation plan shall be required.” [Part I, Chapter 3]
- **Climate Change Chapter, Mitigation for Conversion of Forest Lands to Agriculture or Recreation [Part III, Chapter 1]:** Part III of the Management Plan directs the Commission to develop a Climate Change Action Plan and lists various planning topics including, “Forest resources—protecting forested lands for timber production which provides for carbon storage. This includes siting and development standards, land conversion policies, and other approaches. (1) The Gorge Commission shall prohibit conversion of forest lands to any use other than agriculture, recreation, and open space. For conversion to agriculture or recreation, the Management Plan should require full mitigation.” [Part III, Chapter 1, GMA Policy 1.B].
- **Agricultural Lands [Part II, Chapter 1]:** Agricultural lands in the National Scenic Area are protected for agricultural uses and subject to resource provisions. Some agricultural developments that can impact oak are conversion (e.g., clearing oaks for cultivation or new buildings); fragmentation from new roads, fences, or buildings; and agricultural practices like pesticides, herbicides, or grazing. Certain agricultural developments (e.g., new buildings and structures, new cultivation, and new roads) are subject to the natural resources provisions described above. A specific policy



within the Agricultural Lands chapter of note: In SMA, clearing trees for a new agricultural use is limited to 15 acres, with opportunity for exception.

- **Uses Allowed Outright in All Land Use Designations, Except GMA and SMA Open Space and GMA Agriculture-Special [Part II, Chapter 7]:** The Management Plan allows many agricultural practices without review if those practices occur within areas where agricultural uses had previously occurred.
  - Guideline 1 A. “In the General Management Area, agricultural uses except new cultivation. Any operation that would cultivate land that has not been cultivated, or has lain idle, for more than 5 years shall be considered new cultivation. For this guideline, cultivation and vegetation removal may be allowed in conjunction with a home garden.”
  - Guideline 1 B. “In the Special Management Areas, agricultural uses within previously disturbed and regularly worked fields or areas.”
- **Resource Enhancement Projects [Part II, Chapter 7]:** The Management Plan requires that resource enhancement project applications in GMA and SMA describe goals for enhancement and conditions before and after project implementation. It also requires that applicants seek technical assistance from federal, state, or county experts. Resource enhancement projects are review uses in most Land Use Designations. The Management Plan defines enhancement as “a human activity that increases or makes greater the value, desirability or attractiveness of one or more functions of an existing sensitive area” [Glossary, page 385].

### C. National Scenic Area Act Requirements Regarding Forest Land

- **Forest Land Designation:** The National Scenic Area Act directs the Gorge Commission and the Forest Service to “protect and enhance forest lands for forest uses and to allow, but not require, conversion of forest to agricultural lands, recreation development or open spaces” [NSA Act Section 6(d)(2)].
- **Forest Practices:** The National Scenic Area Act states that the Act does not “affect the rights and responsibilities of non-Federal timber land owners under the Oregon and Washington Forest Practices Acts.” 16 U.S.C. § 544o(c). In the GMA, forest practices are overseen by the Oregon Department of Forestry or the Washington Department of Natural Resources. In the SMA, the Forest Service reviews forest practices. If there is oak habitat in Open Space, the Management Plan does not permit forest practices in the Open Space land use designation. [Part II, Chapter 3]

## III. Summary of Themes

This section summarizes the main issues and challenges that planning staff from the Gorge Commission, Forest Service, and National Scenic Area counties describe when reviewing development applications for sites where Oregon white oak is present.



While Oregon white oaks are found in all six NSA counties, the majority are located in Klickitat and Wasco Counties.

Each county is unique, but to illustrate the kinds of NSA development reviews located in oak woodlands, here is a summary of recent permits in Klickitat County:

- Over the past five years, approximately 40 out of 59 total permits in Klickitat County have been issued on a mix of private and public lands with oak present.
- Applications for new uses included new home sites, accessory buildings, agricultural buildings, road building, new cultivation, wineries, and one resource enhancement project.
- Applications submitted in oak habitats in Klickitat County tend to require longer review times and consultation with experts to implement the resource protection provisions.

The following themes emerged during this assessment as challenges that planners and managers are experiencing when permitting projects in oak woodlands.

### A. Removal of Oaks and Forest Conversion Requiring Mitigation

**Issues:** An overarching issue reported by planners is that oak removal often occurs outside of the development review process. They described several situations in which oaks are cut before a permitting process or without the need for an NSA permit. Below are a few circumstances that can result in oak removal or conversion:

- a. Landowners can receive approval from their state forestry agency for lawful forest practices that include removing oak trees.
- b. Landowners can convert forested lands to agricultural lands as a forest practice. An NSA permit is required only if that conversion is done simultaneously with new development.
- c. Landowners have removed oaks prior to contacting their local planning agency, resulting in an after-the-fact review of resource impacts or no action.
- d. Uses allowed outright or review uses may also result in removal. Policies in the Management Plan require or encourage avoidance or mitigation according to the specific location and type of proposal.

This Management Plan guideline drew many comments: “Oregon white oak shall not be removed if practicable alternatives exist. If no practicable alternative exists, a wildlife survey and mitigation plan shall be required.” In particular, planners expressed the need for greater clarity on demonstrating “no practicable alternative” and the types of avoidance measures and mitigations that should be used in different situations within the development review process. Some said it would be helpful to share with applicants early in the process the types of mitigation that might be required to encourage careful siting and discourage oak removal. Presently, it is difficult to say what required mitigation entails.



Examples of mitigation ratios and requirements do exist, yet planners described their struggle to determine how to apply these examples across various conditions (e.g., private and public lands, small and large parcels, small and large project footprints, and large mature oaks and dense younger stands). In recent years, one example of a project including approved off-site mitigation is the segment of the Historic Columbia River Highway State Trail from Viento State Park to Mitchel Point. Some planners expressed interest in formalizing off-site mitigation and providing more guidance on where this work could occur.

**Examples:** When significant public utilities and roads projects are proposed in oak habitat, a large area of oak trees can be cleared. The most recent WDFW management recommendations for Oregon white oak include mitigation ratios for loss of individual trees ranging from 50:1 for trees between 12-6 inches diameter at breast height (dbh) to 250:1 for larger trees greater than 30 inches dbh. In the case of a large road project, strict replacement on the remaining right-of-way property is often not possible. Some planners expressed concern over the challenge of implementing a 50:1 ratio at some residential sites.

On agricultural lands in the NSA, agricultural uses are allowed, with the requirement that new development, including new cultivation, must meet resource provisions. These resource provisions include protection of priority habitats like Oregon white oak. Agricultural-related development and oak protection can at times seem at odds, making implementation of current policies challenging.

## B. Definitions in the Management Plan

**Issues:** The Management Plan does not include an objective definition of priority habitat for Oregon White Oak Woodlands and does not prescribe methods for assessing, allowing, or mitigating impacts. Planners shared a few examples of questions they encounter: Do the priority habitat provisions apply to any mixed forest that has oak trees? Does one oak tree constitute oak habitat? They expressed that both planners and landowners would benefit from improved access to natural resources expertise and guidance. In Klickitat County, planners have worked with Underwood Conservation District to advise landowners on several projects affecting oak. East Cascades Oak Partnership is continuing to refine monitoring tools that could help interested landowners assess oak habitat types and condition. Forest Service specialists support local planners as they are able, though uncertainty around staffing and funding levels remains a challenge.

Forest Service and Commission staff also observed that definitions and terms for oak systems are not consistent between Natural Resource and Scenic Resource provisions of the Management Plan. Clearer definitions could help planners implement existing guidelines intended to protect Oregon white oak as both a natural and scenic resource.

**Examples:** For SMA reviews, the Forest Service uses several data layers along with site visits to determine priority habitats. For GMA reviews, definitions used by WDFW and other



partners can be useful but are not standard. Washington counties can refer to their own datasets for critical areas that can include oak woodlands.

### C. Information and Education for the Public, Landowners, and Planners

**Issues:** Planners reported that many residents applying for development permits seem to generally understand that oaks are a unique habitat and show interest in protecting them. However, broader public awareness of the unique values of oaks is needed to help inform landowners early in the project planning process before they contact planning departments. In cases when landowners remove oaks through a forest practice application or without a permit, planners have no opportunity to share information or options with them as part of the planning process. When applicants do not express interest in oaks, planners described the challenge of encouraging them to protect or enhance oaks during project planning and permitting. Conservation Districts can be incredibly helpful in working with landowners to identify and meet the goals they have for their properties, while maintaining or improving the habitats found there. ECOP has developed resources to help communicate the many values of oaks to different audiences, including how they provide fire resilience.

Another important educational opportunity that Commission staff hear consistently from Tribal members and staff is the need for greater public awareness of Tribes' presence and relationships with the lands and waters of this region as they exercise their Treaty Rights to gather culturally important foods. Working with Tribes to improve community awareness of their living cultures can help reduce conflicts, foster stewardship of native plant species on all lands, and build understanding of the cultural significance of oak habitats.

**Example:** One example a planner shared involved a new vineyard developer who generally enjoyed the oaks on his property, yet voiced surprise and frustration during the application process when learning about the need to make changes to avoid oak removal. The landowner shared that more information about ways to meet requirements would have been helpful early in the process, including the unique value of acorn-producing trees on this property.

### D. Oak Habitat Enhancement

**Issues:** Resource enhancement applications are not common in the National Scenic Area; rather oak management is more often discovered after-the-fact when reviewing a new use or development. To date, most resource enhancement projects involving oak have occurred in SMA. During Gorge 2020, we heard from several enhancement project proponents that permitting barriers and cost for enhancement permits through the counties were a major challenge. These types of permitting barriers were reported as most significant for wetland and water resource enhancements.

Planners would like more confidence when reviewing proposed enhancement activities that the methods and approaches are likely to succeed. Providing adequate quality control and technical assistance for these projects has been a challenge in the past. It is important



to note that the Management Plan addresses Oregon white oak only within the context of wildlife habitat because oak trees are protected under Sensitive Wildlife Review Criteria, not by Rare Plant Review Criteria. For this reason, planners must rely on wildlife specialists for technical input. Planning departments often do not have dedicated wildlife biologists on staff. Forest Service resource specialists and state wildlife agency staff are available to provide some technical guidance. Gorge Commission staff are also adding some capacity through improved mapping and information sharing as part of VSI and Climate Action programs.

**Examples:** Planners reported a few instances of “resource enhancement” applications that did not seem to follow general best practices for oak management. Planners suspected in these cases the applicants had other management goals for the properties. At times, defensible space is used to justify oak removal.

#### IV. Potential Planning and Policy Improvements

Along with identifying key issues related to development reviews in oak habitat, participants in this assessment discussed opportunities to address these issues through various planning and policy improvements. Planners discussed initial criteria to help prioritize issues and needs included in this assessment. The following criteria are offered as a starting point for Commission discussion of policy priorities later this year. To what extent does acting on the issue:

- (1) Reduce delays or difficulties in the permitting process,
- (2) Increase opportunities to have fair, defensible outcomes across projects,
- (3) Protect existing oak habitat,
- (4) Address needs raised by county planning staff or permit applicants, and
- (5) Support other strategic Forest Service or Gorge Commission goals?

Staff recognizes that the Commission, through its broader engagement with Tribes and communities in the NSA, may identify additional criteria that are useful for setting its policy agenda.

Participants in this assessment discussed the following opportunities to improve implementation and effectiveness of existing policies and develop new policies during the next Management Plan revision process:

- **Guidance for implementing current policies:** Procedures and definitions for identifying priority oak habitat, determining mitigation, and supporting enhancement projects that are likely to benefit oak habitat
- **Policies** to increase consistency in the procedures, definitions, or maps used during development review process



- **A mitigation policy** for Oregon white oak to set expectations and improve fairness and outcomes
- **Policy** to increase oak protection based on land use designation
- **Education and outreach** for residents and resources for planners
- **Coordination** with WA and OR State Forestry agencies who regulate forest practices

The following section describes these opportunities in more detail and includes a status update on staff work underway where applicable.



## V. Summary Table of Possible Actions

Commission staff developed the following list of actions to address the key issue themes, needs, and opportunities discussed with planners through this assessment. The table below includes descriptions and status of these actions. Some tasks are already underway as part of specific actions identified in the Oregon White Oak Woodlands section of the Climate Change Action Plan. Others are potential actions the Commission may choose to prioritize as part of preparing for the next Management Plan review.

Action	Description	Status
<b>A. Develop maps and definitions</b>		
A.1 Define Oregon white oak habitats	Review definitions currently used by ECOP, WDFW, ODFW, USFS, and others. Adapt as needed for NSA.	Initial review of definitions complete. Coordinating with USFS, ECOP, WDFW, and ODFW to adapt for NSA.
A.2 Develop map of critical oak habitats in the NSA	Work with USFS, ECOP, and state wildlife agencies to map oak habitats and make a recommendation to planners about how to use map.	Draft oak extent map complete. Work underway with USFS, ECOP, WDFW, and ODFW to identify critical oak habitat areas in the NSA.
<b>B. Produce guidance documents for permit applicants and planners</b>		
B.1 Synthesize best practices and resources for achieving oak enhancement and protections in the NSA	Develop a resource guide for planners and permit applicants that includes best management practices, decision support tools, and monitoring protocols.	Compiling a draft resource list for ECOP review.
B.2 Develop a guidance document for oak enhancement applications in the NSA	Drawing upon compiled best practices, produce non-regulatory guides for oak habitat enhancement project applications.	Reviewing compiled resources for applicability to oak enhancement projects in the NSA.
B.3 Develop mitigation guidance or adapt existing mitigation guides to the NSA	Develop non-regulatory guidance for assessing impacts, assigning mitigation requirements, and describing practicable alternatives. Include	Reviewing past approved mitigation plans and other existing mitigation resources for applicability in the NSA.



Action	Description	Status
	decision trees for applications based on LUDs, parcel size, project type, etc.	
<b>C. Draft policies for Management Plan revision</b>		
C.1 Develop a mitigation policy, drawing upon B.3. above	Define when, where, and how mitigation shall be required. Evaluate maps and development potential to inform critical corridors and winter range in oak habitat.	Need to review existing mitigation policy examples.
C.2 Draft provisions that would apply to new review uses in oak	Evaluate maps and development potential to determine need for policy change and benefits to protected resources. In Forest LUDs, policies could focus on conversion to non-forest uses. In Agriculture LUDs, policies could focus on new review uses with larger footprints.	When maps are complete, will evaluate development potential and land use designations in oak priority habitats or critical corridors. Outreach and input will be important next steps.
C.3 Review and consider whether maps or map tools should become regulatory	Evaluate options for use of oak map: remain an optional resource for planners to use in reviewing applications or use to determine where policies are applied.	Oak map work underway for VSI will help inform this recommendation.
C.4 Review Management Plan for discrepancies between oak language in different resource chapters	Review and assess need for updates to natural and scenic resource provisions to improve consistency of terminology across Management Plan chapters.	Complete as time and resources allow or request input during next Management Plan review process.
<b>D. Support public outreach about the importance of oaks and their protection</b>		
D.1 Support outreach efforts and promote educational materials (priority action in Climate Change Action Plan)	With ECOP and other partners, share information about the importance of Oregon white oak for fire resilience, biodiversity, watershed function,	Ongoing coordination with ECOP to share oak informational materials, contribute to permitting section of ECOP website, and provide community



Action	Description	Status
	cultural significance, and public enjoyment.	learning opportunities through Climate Stewards program.
<b>E. Strengthen strategic coordination and build capacity</b>		
E.1 Coordinate with state forestry agencies (priority action in Climate Change Action Plan)	Coordinate with Oregon Department of Forestry (ODF) and Washington Department of Natural Resources (DNR) on climate change priorities including Oregon White Oak Woodlands and Fire Risk.	ODF-CRGC annual coordination meeting now includes climate action topics. Working with DNR on defensible space outreach to NSA residents.
E.2 Increase technical assistance capacity with local service providers (priority action in Climate Change Action Plan)	Coordinate with conservation districts, ECOP, and USFS to connect landowners with available resources and identify partnership and funding opportunities to improve technical assistance for landowners in the NSA.	Working with ECOP to connect interested landowners with oak condition assessment tool. Coordinating with Underwood Conservation District and others on defensible space outreach for NSA residents.
E.3 Build understanding of recreation pressures in oak habitat	Coordinate with recreation managers in the Gorge to better understand and address recreation pressures in oak habitat.	Ongoing participation in Gorge Stewardship Network. Assessing recreation use across habitat types as part of VSI.



## VI. Next Steps

- Staff will present a summary of this assessment's findings to the Commission at the meeting on July 8, 2025. As an introduction to this topic, East Cascades Oak Partnership presented an overview of the importance of oak habitats in the Gorge at the Commission meeting on March 11, 2025.
- Incorporating Commission input from the July 8<sup>th</sup> meeting, staff will refine policy options and conduct a work session in fall 2025 to seek Commission guidance on oak policy priorities for the 2026 work plan.

## VII. Resources Reviewed for this Assessment

Columbia River Gorge Commission, Climate Change Action Plan for the Columbia River Gorge National Scenic Area, [https://www.gorgecommission.org/images/uploads/pages/Approved\\_Columbia\\_River\\_Gorge\\_Commission\\_Climate\\_Change\\_Action\\_Plan\\_-\\_02.28.2023\\_1.pdf](https://www.gorgecommission.org/images/uploads/pages/Approved_Columbia_River_Gorge_Commission_Climate_Change_Action_Plan_-_02.28.2023_1.pdf).

Columbia River Gorge Commission and USDA Forest Service, Management Plan for the Columbia River Gorge National Scenic Area (2020), <https://www.gorgecommission.org/images/uploads/pdfs/! Management Plan Complete and Formatted.pdf>.

East Cascades Oak Partnership, Strategic Action Plan 2020-2030, <https://eastcascadesoakpartnership.org/wp-content/uploads/2025/03/ECOP-STRATEGIC-PLAN.pdf>.

Halofsky, Jessica E.; Peterson, David L.; Gravenmier, Rebecca A., eds. 2022. Climate change vulnerability and adaptation in the Columbia River Gorge National Scenic Area, Mount Hood National Forest, and Willamette National Forest. Gen. Tech. Rep. PNW-GTR-1001. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 469 p. <https://doi.org/10.2737/PNW-GTR-1001>.

Nolan, M. P., and J. M. Azerrad. 2024. Management recommendations for Washington's priority habitats: Best management practices for mitigating impacts to Oregon white oak priority habitat. Washington Department of Fish and Wildlife, Olympia, Washington. <https://wdfw.wa.gov/sites/default/files/publications/02465/wdfw02465.pdf>.

