

**Attachment B: Gorge 2020 Phase I and II Scoping January through March 2017
Summary of Agency and Partner Comments**

Gorge Commission staff received written comment letters regarding Gorge 2020, the National Scenic Area Management Plan review and revision. Comments submitted by agencies and organizations ranged from very general, to very specific suggested policy changes. Letters were received from the following entities and are included in this attachment:

City of Hood River
City of The Dalles
City of Mosier
Dufur Volunteer Fire and Ambulance
Friends of the Columbia Gorge *and* Oregon Physicians for Social Responsibility
Hood River County Forestry Department
Hood River County Community Development
Klickitat County Board of County Commissioners
Mid-Columbia Economic Development District
Mid-Columbia Fire and Rescue
Mid-Columbia Housing Authority
Mid-Columbia Housing Authority *and* Columbia Gorge Housing Authority
Multnomah County Land Use Planning Division
Oregon Department of Fish and Wildlife
Oregon Department of Forestry
Port of The Dalles
Representative Mark Johnson, Representative John Huffman, *and* Senator Chuck Thomsen
Skamania County Economic Development Council
South Sherman Fire and Rescue
Wasco County Economic Development Commission
Wasco County Planning Department
Washington State Department of Transportation *and* Oregon Department of Transportation
West Side Fire Protection District
Wy'East Fire District

Common themes that emerged were:

- The agencies and partners would like to be engaged in the plan review process.
- The Commission is urged to clearly address urban area boundary changes.
- There is interest in reducing the length and duration of development reviews to make the process streamlined, as well as a need for more consistent interpretation of the management plan.

- There is a need for recreation planning in the NSA to help address issues with current overuse and parking problems, but also to strategically plan for additional recreation opportunities.

Below is a general summary of comments taken from the agency and partner letters separated into three general categories: 1) Comments directly related to the CRGC's Gorge 2020 Process and Plan content, 2) comments that can be addressed outside of Gorge 2020 through staff-led programs, partnerships, and operations, 3) comments that relate to issues or actions beyond the Commission's authority or that are too general to be addressed.

The order of the items does not imply issue priority or the frequency with which comments were repeated.

COMMENTS DIRECTLY RELATED TO THE CRGC's GORGE 2020 PROCESS

Plan Review Process

- Engage with agencies and partners throughout the plan review process
- Update resource inventories before moving forward with plan revision
- Broaden participation in the process of plan review locally, regionally and nationally

Implementation

- Streamline application processes
- Clarify and streamline the review process for temporary structures
- Create a list of non-discretionary uses
- Use land purchases and/or transfers of development rights as tools to implement the management plan
- Ensure grandfathered uses/buildings adhere to management plan goals
- Provide clearer definitions of key terms in glossary
- Address and avoid cumulative effects to all resources

Economics

- Identify a clear process to change urban area boundaries
- Incorporate existing economic development plans
- Address split zoning
- Ensure tourism is not the only economic development considered
- Provide for small home based business
- Address housing affordability by expanding urban areas

Natural Resources

- Increase timber harvest in SMA, no new restrictions in GMA
- Allow for harvest on private lands to increase overall forest health, allow salvage after fire
- Be more restrictive of timber harvest, ensure no clear cutting is allowed on public lands

- Incorporate recent updates from state conservation strategies for the protection of fish and wildlife into the NSA plan especially in the areas of:
 - White Oak Habitat
 - Winter range
 - Fence specifications
 - Stream crossings
- Ensure tracking and control of invasive species
- Revisit planting lists for mitigation plantings
- Curtail recreation in critical and sensitive habitat
- Include standards for air and light pollution in the Plan

Cultural Resources & Treaty Rights

- Complete cultural resource reconnaissance surveys prior to approval of new land divisions, ground disturbing uses or developments.
- Ensure protection of treaty rights
- Revise treaty rights consultation process

Scenic Resources

- Remove “visual subordination” and KVA requirements and replace with a GIS based elevation model or similar
- Reduce limitations on development due to scenic resources (key viewing areas, visual subordination)
- Continue stringent management of scenic resources

Recreation

- Allow for more trail development including linked trail systems
- Allow for more recreational development in SMA
- Revisit recreation intensity classes for transit purposes
- Evaluate current visitation numbers and address impacts
- Improve river access but avoid adverse impacts to sensitive resources and treaty rights

Development

- Restrict new development to land within the Urban Areas
- Provide for unforeseen changes or new uses
- Address new technologies in plan I.E. solar, cellular, self-driving cars
- Relax restrictions on development in agricultural parcels
- Change restrictions on building size and building sites

Wildfire/Climate Change

- Address and plan for climate change
- Incorporate Firewise Community program into the NSA management plan
- Incorporate the International Wildland Urban Interface Building Code into the Plan

- Adopt an exemption to the emergency response fire suppression procedures and provisions with the CRGNSA management plan
- Manage* timber resources for overall forest health to prevent wildland fire

*Staff note: CRGC does not actively manage timber, but has some related regulatory authority

Transportation/Safety

- Parking areas and access along the HCRH are inadequate. Pedestrians often cause a safety hazard for motorists
- Transportation via river, rail, air, and highway are vital and should be supported and allowed to expand to meet growing needs
- Certain processes that ODOT and WSDOT implement affect public safety and would benefit from expedited processing or less stringent requirements. Processes include but not limited to:
 - The creation of new disposal sites
 - Geotechnical Investigations
 - Use of Barriers
 - Rock Fall protection

COMMENTS THAT CAN BE ADDRESSED OUTSIDE OF GORGE 2020 THROUGH STAFF-LED PROGRAMS, PARTNERSHIPS, AND OPERATIONS

- Shorten duration of land use applications and development reviews
- Increase the consistency of interpretation of the NSA Management plan
- Create an advisory committee of ranchers and farmers for the Gorge Commission
- Provide for better enforcement of current NSA plan
- Address general concern about transportation of fossil fuels through the scenic area (both spills and pollution from coal dust)

COMMENTS THAT RELATE TO ISSUES OR ACTIONS BEYOND THE COMMISSION'S AUTHORITY OR THAT ARE TOO GENERAL TO BE ADDRESSED

- Ensure affordable housing for all residents

- Fence specifications
- Stream crossings
- Ensure tracking and control of invasive species
- Revisit planting lists for mitigation plantings
- Curtail recreation in critical and sensitive habitat
- Include standards for air and light pollution in the Plan

Cultural Resources & Treaty Rights

- Complete cultural resource reconnaissance surveys prior to approval of new land divisions, ground disturbing uses or developments.
- Ensure protection of treaty rights
- Revise treaty rights consultation process

Scenic Resources

- Remove “visual subordination” and KVA requirements and replace with a GIS based elevation model or similar
- Reduce limitations on development due to scenic resources (key viewing areas, visual subordination)
- Continue stringent management of scenic resources

Recreation

- Allow for more trail development including linked trail systems
- Allow for more recreational development in SMA
- Revisit recreation intensity classes for transit purposes
- Evaluate current visitation numbers and address impacts
- Improve river access but avoid adverse impacts to sensitive resources and treaty rights

Development

- Restrict new development to land within the Urban Areas
- Provide for unforeseen changes or new uses
- Address new technologies in plan I.E. solar, cellular, self-driving cars
- Relax restrictions on development in agricultural parcels
- Change restrictions on building size and building sites

Wildfire/Climate Change

- Address and plan for climate change
- Incorporate Firewise Community program into the NSA management plan
- Incorporate the International Wildland Urban Interface Building Code into the Plan
- Adopt an exemption to the emergency response fire suppression procedures and provisions with the CRGNSA management plan
- Manage* timber resources for overall forest health to prevent wildland fire

*Staff note: CRGC does not actively manage timber, but has some related regulatory authority

Transportation/Safety

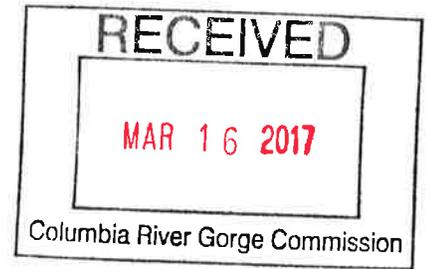
- Parking areas and access along the HCRH are inadequate. Pedestrians often cause a safety hazard for motorists
- Transportation via river, rail, air, and highway are vital and should be supported and allowed to expand to meet growing needs
- Certain processes that ODOT and WSDOT implement affect public safety and would benefit from expedited processing or less stringent requirements. Processes include but not limited to:
 - The creation of new disposal sites
 - Geotechnical Investigations
 - Use of Barriers
 - Rock Fall protection

COMMENTS THAT CAN BE ADDRESSED OUTSIDE OF GORGE 2020 THROUGH STAFF-LED PROGRAMS, PARTNERSHIPS, AND OPERATIONS

- Shorten duration of land use applications and development reviews
- Increase the consistency of interpretation of the NSA Management plan
- Create an advisory committee of ranchers and farmers for the Gorge Commission
- Provide for better enforcement of current NSA plan
- Address general concern about transportation of fossil fuels through the scenic area (both spills and pollution from coal dust)

COMMENTS THAT RELATE TO ISSUES OR ACTIONS BEYOND THE COMMISSION'S AUTHORITY OR THAT ARE TOO GENERAL TO BE ADDRESSED

- Ensure affordable housing for all residents



March 13, 2017

Columbia River Gorge Commission
Krystyna Wolniakowski, Executive Director
1 Town & Country Square
57 NE Wauna Avenue
White Salmon, WA 98672

Re: Comments to the Columbia River Gorge Commission: Gorge 2020 Management Plan Review

To the Columbia River Gorge Commission:

Thank you for the opportunity to provide formal comments on Gorge 2020, the update to the Management Plan for the Columbia River Gorge National Scenic Area. The City of Hood River supports the Columbia River Gorge National Scenic Area Act and protection of the outstanding resources and recreation amenities that make this such a special place to live. Along with the protection of the national resources, we must also protect the urban areas, and allow them to maintain viability.

The short supply of affordable housing is changing the composition of our community and is making it difficult for working people to live in Hood River. To enable Hood River to better plan for its future, we would like the Gorge Commission to provide clarification and definition of what exactly is a "minor revision" of the urban area boundaries, as allowed in Section 4(f) of the National Scenic Area Act. This should be included in the scope of review for the Management Plan. The City staff is available to provide assistance on this topic to offer input, especially if an expansion of their Urban Growth Boundary is to be contemplated.

Now is a good time for the Commission to clarify the urban area boundary revision terms and procedures. The City of Hood River has completed its Housing Needs Analysis for the next 20 years, and has just barely enough land for future growth. With proposals for increased densities and potential increases in building height Hood River may be able to work within our current boundary, however, any process to expand our Urban Growth Boundary requires meeting the Department of Land Conservation and Development Commission's Goal 14- Urbanization requirements along with the Scenic Area requirements. We have to plan years ahead and a clear and measurable process to expand our urban area boundary, if needed, is essential.

Respectfully,

Paul Blackburn, Mayor



March 8, 2017

City of Mosier Comments regarding Columbia Gorge National Scenic Area Management Plan Review

Dear Gorge Commission and Staff,

The City of Mosier is a small rural community with very few resources other than the considerable asset of its location along the Columbia River in the heart of the National Scenic Area. In the early 20th century, the City of Mosier was a regional transportation hub for both freight and passengers by rail, steamboat, and road (Highway 30) and the city bustled with 33 businesses located in its downtown core. But by the 1970's, Mosier had lost all of those transportation connections and was left with no businesses, no local services, no local jobs, and a diminished sense of identity.

However, the recent rise in visitors coming to this region to experience the beauty of the Columbia Gorge and to access its many recreational opportunities has brought new life to Mosier's downtown commercial area and new residential development. Most people building homes in Mosier cite quality of life and the scenic vistas as their main reasons for choosing to live in Mosier.

The City of Mosier City Council appreciates the work of the Gorge Commission, which is charged to protect this unique natural landscape that is the lifeblood of our community.

Recreational Resources

The restoration of the Historic Columbia River Highway in 2000 between Hood River and Mosier sparked a surge of both commercial and residential development activity and community revitalization. And in 2013 the Friends of the Columbia Gorge Towns to Trails program completed a section of that regional trail system in Mosier, called the Mosier Plateau Trail. This trail head is located in downtown Mosier, which means that hikers accessing the trail park in downtown Mosier will most likely enjoy Mosier's downtown restaurants and pub before or after their hike.

The City of Mosier urges the Gorge Commission to strengthen existing policies and guidelines and to adopt new ones which strongly support these types of visionary trail systems which benefit the downtown cores of the Gorge communities. These regional trails are designed to attract vehicle traffic to our downtown parking areas, which has the additional benefit of relieving the congestion in US Forest Service Areas and State Parks and brings the benefits of tourism to the downtown cores of the urban areas.

We also request support for trail enhancement projects like the Gorge Hubs Project. The Gorge Hubs are also designed to bring visitors into the downtown cores of the Historic Columbia River Highway cities like Mosier, yet past Gorge Commission staff tried to prevent this project from moving forward, stating that these trail head enhancements would negatively impact the National Scenic Area.

Restrict New Development

You can imagine, then, when the Gorge Hubs project prompted serious Gorge Commission concerns about increasing negative impacts to the Scenic Area, that it was difficult for the City of Mosier to understand how the Gorge Commission could have approved the Broughton Resort proposal in 2007, which required an amendment to the Management Plan which favored one developer and approved the development of a luxury destination area twice the size of Mosier. (See attached City of Mosier City Council letter of concern.)

We urge the Gorge Commission to strengthen existing polices or adopt new ones which encourage new development to occur in existing Urban Areas only and not on National Scenic Area lands, and to also prevent reduction in minimum lot sizes, which doubles the impact of development on the existing communities like Mosier who are experiencing serious groundwater declines.

Protect Natural and Recreational Resources

In February of 2012, the City of Mosier City Council was deeply disturbed to learn that the Gorge Commission had allowed a clearcutting operation on lands zoned as GMA Open Space just above the Mosier Twin Tunnels State Trail (see attached City of Mosier letter of concern). New growth will take many decades to take root and to stabilize those steep slopes and to cover the large swath of scarred landscape.

We request that the Commission now to clarify and to strengthen the Gorge Commission's historic position that timber harvest is not permitted in GMA Open Space.

River Access: The Columbia River is the single greatest asset in the Scenic Area, yet many of our communities and recreational areas are blocked from safe and legal access. The Management Plan should include policies that support improvements to river access when that access does not impact sensitive resources or treaty rights.

Fossil Fuel Concerns

On June 3rd of 2016, an oil train derailed in the City of Mosier, spilling 42,000 gallons of Bakken Crude Oil. The City is concerned about fossil fuel imports and exports through the Columbia Gorge that could have long lasting and widespread negative impacts to all of the scenic, natural, cultural, and recreational assets of the Scenic Area and the urban areas. We request Management Plan requirements for the safe passage of any hazardous commodity.

Industrial Use Expansion

The City of Mosier requests clarification that industrial uses like rail roads must meet the applicable Scenic Area standards in order to apply for expansion.

Climate Change Impacts

The City of Mosier requests inclusion of standards that evaluate and address climate change, especially when considering major development projects.

Thank you

The Mosier City Council appreciates the work that the Gorge Commission has undertaken to review and to strengthen the Management Plan so that it is an effective tool that will protect the Scenic Area and our communities for generations to come.

Sincerely,

The Mosier City Council

Mayor M.D. Berry
Council President Allan Rodrick
Andrea Rogers
Iva Harmon
Peny Wallace
Bill Akin
Kathy Fitzpatrick

City of Mosier

P.O. Box 456 Mosier, OR 97040
541-478-3505 541-478-3810 (fax)
mosiercityhall@gorge.net

The City of Mosier is opposed to the current Broughton Resort proposal.

1. The proposed development should conform to the existing management plan, which would allow for a recreation-based resort if developed to a proper scale. The scale and impact of any development allowed must be limited to ensure compatibility with the scenic, cultural, recreational, and natural resources as are currently protected by the National Scenic Act.
2. The Gorge Commission should not make an amendment to the National Scenic Act Management Plan to favor one developer. This will set the precedent of applying the rules to some, but giving exceptions to others. These actions will only weaken the NSA management plan and will create an irreparable breach of trust with the people and the communities who live within the Scenic Area borders.
3. Mosier has been an incorporated city since 1914. We now have a population of 430 people, projected to grow to 750 residents by the year 2024. That is a possible 750 residents in 110 years. In comparison, the Broughton development will have a projected population of 555 beds or a possible 750 residents in 10 years. The City of Mosier has already felt the strain of balancing our resource and infrastructure demands as our population grows. Two of our most pressing issues are: our water supply (our aquifers are dropping at an average of 4 ft. a year) and our under-staffed and under-funded fire department. We would recommend a careful analysis of how this development will affect the resources of already established communities in the area.
4. The Gorge Commission has so far met with the Underwood Community Council, the Yakima Nation, and “several windsurfers,” giving those groups special consideration. The city of Mosier would respectfully submit that EVERY community in the national scenic area would be impacted by changes to the NSA management plan, and that we would all be impacted heavily by the “inevitable ripple effects” and “controversial precedents” that the Broughton proposal itself acknowledges that it will create. The existing Gorge communities depend upon the promises of the National Scenic Act: to enhance our natural resources and to promote economic development within our already established urban areas. We would recommend a careful analysis of how this development could have a negative affect not on the *existing* commercial development within our communities, but on the *future* commercial development within our communities.
5. Finally, we would recommend waiting for the Cumulative Impact Study which will establish the necessary baseline that should be consulted before approving any development like the Broughton proposal which will have such a large and permanent impact on the face of the Columbia River Gorge Scenic Area.

The Mosier City Council at their regular meeting on February 7, 2007 came to a unanimous consensus to allow this statement to be presented.

September 7th, 2012
Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98682

Dear Gorge Commission Members,

The City of Mosier is deeply concerned about the logging activities that occurred in February 2012 on lands zoned as GMA Open Space above the Mosier Twin Tunnels State Trail. The City is concerned that the logging was allowed to occur although ODF's own internal policy states that "there are some zones, such as 'Open Space,' that do not allow forest operations." Their policy also states, "For operations within the GMA, ODF shall send copies of notifications and written plans to the Forest Service, Gorge Commission and applicable local government. Enforcement of zoning provisions that prohibit forest practices in the GMA are not the responsibility of ODF and are left to the Commission or the county." The Gorge Commission Director's Report on Timber Harvest in GMA Open Space of July 3, 2012, also confirms the Gorge Commission's current and historic position that timber harvest is not permitted in GMA Open Space. Yet neither the Gorge Commission nor the Oregon Department of Forestry were able to fulfill their duties and responsibilities to protect public resources and the logging above the Mosier Twin Tunnels State Trail did occur.

The City of Mosier is vulnerable to any threats to the area between Hood River and Mosier because the City has begun the process of a downtown revitalization whose success depends to a significant degree on the continuation of GMA Open Space protections given to the important bluffs above and alongside the Mosier Twin Tunnels State Trail.

In 1910, the City of Mosier was home to 33 booming businesses. We were connected to the region by steamboat passenger and freight services, railroad passenger and freight services, and automobile passenger and freight services along the Historic Highway. But when the Bonneville dam was built, we lost our steamboat connection. When I-84 was built, our Historic Highway connection was abandoned by ODOT. In the 1970's, we lost our train depot. Our businesses slowly suffocated and the vibrant downtown life that we once enjoyed was almost diminished.

And then in the year 2000, the Historic Highway was rebuilt between Hood River and Mosier as the Mosier Twin Tunnels State Trail. Mosier became reconnected to the region and we immediately gained three important businesses downtown—our pub, our restaurant, and our coffee house. Mosier has become a recreational destination for the growing sport of cycling and also for the internationally famous hiking opportunities near us because of our central location in the National Scenic Area. Our coffee house and ice cream shop bustle in the summer mornings and our restaurant and pub offer the liveliest backyard BBQ atmosphere in the Gorge.

The City of Mosier has invested significant resources into preparing for future downtown development. We are purchasing 4 acres of commercial property along the Historic Highway, our Main Street, this year. We have received several grants for and are working with regional and state government agencies to develop a bicycle and pedestrian Welcome Center and rest area called the Mosier Hub.

The City's successful revitalization of Main Street, however, depends on these two things: that the Gorge Commission is consistent in its policies and in its application of its own regulations and that the Gorge Commission continues to strongly support the two purposes of the Scenic Act. #1. To protect and provide for the enhancement of the scenic, cultural, and recreational and natural resources of the

Columbia River Gorge. #2. To protect and support the economy of the Columbia River Gorge area by encouraging growth to occur within the existing urban areas and by allowing future economic development in a manner consistent with the first purpose.

In 1991, the Gorge Commission prepared an Open Space memo which addressed the area between Hood River and Mosier:

“The Commission received more comments of support on this candidate Open Space area than any other. ...identified by ODOT as the highest priority project for restoration under section 12 of the Scenic Area Act. The entire bluff is highly scenic from prominent key viewing areas. The chief threats to scenic resources are logging and mining.” A second memo followed: “Logging would dramatically reduce the scenic and recreational values of the area...”

The City of Mosier is concerned that the Gorge Commission has already begun the process of questioning this Open Space land use designation without the benefit of public discussion. What is the underlying intention behind the decision to question the Open Space zoning? Does the Gorge Commission intend to create new types of zoning or eliminate certain lands from those currently zoned GMA Open Space? How will this impact the City of Mosier now and in the future? What will be the cumulative impacts of these changes that are alluded to as possibilities in the Director's Report? Why is the Gorge Commission pursuing an inquiry that appears intended to remove certain protections from or completely eliminate the zone GMA Open Space?

There are also many questions regarding the logging event that our Mosier City and Scenic Area residents and business owners have been asking us with some urgency. Have there been or will there be any mitigation or restoration actions on the logged lands? What is the likelihood that this area will slide in heavy rains? Is there a possibility of impact to the Historic Highway? Will there be more logging in this area in the future?

The City of Mosier would like to develop a better system of communication with the Gorge Commission. The City of Mosier has few resources within our City limits, yet the protection of the lands in the Scenic Area that surround us gives us access to incredible public resources that we had hoped to rely on as we move forward in our efforts to revitalize our city.

The Gorge Commission Director's Report on Timber Harvest in GMA Open Space refers to possible changes in the Gorge Commission's policies and management of the Scenic Area. This creates uncertainties for the planning of the City of Mosier's economic development. If the Gorge Commission is preparing for changes to these protections, the City requests to be included in these discussions.

The City of Mosier invites the Gorge Commission Board and Staff to attend a City Council meeting in October or November of this year to address our concerns. Please contact our City Recorder Jean Hadley at 541-478-3505 to let us know which City Council meeting would be most convenient for those Gorge Commission representatives who would like to participate.

Thank you all for your continued service to this beautiful Columbia River Gorge Scenic Area that we call home.

Mayor Andrea Rogers and The City of Mosier City Council



Dufur Volunteer Fire and Ambulance

March 6, 2017

Columbia River Gorge Commission
57 NE Wauna Avenue
P.O. Box 370
White Salmon, WA 98672
E-Mail: planreview@gorgecommission.org

Re: Columbia River Gorge Commission Management Plan Review

To Whom it May Concern,

The Columbia Gorge National Scenic Area has certainly experienced its share of wildland fires over the past several years. Wildfire can have a positive and cleansing effect on the landscape, however, the disaster sequence starts when a wild fire or multiple wildfires burn during extreme fire conditions. The combination of extreme vegetation, weather, and topographic conditions given a fire start produces fast-spreading, intensely burning fires that overwhelm wildfire suppression efforts. If extreme wildfire spreads close enough to residential development with its flames and firebrands, hundreds of ignitable homes can be simultaneously exposed.

Unfortunately, once a wildfire ignites, firefighters are limited in what they can do to protect the values in its path. The National Fire wise Communities Program is a national interagency program that encourages partnerships among communities, homeowners, private industry, tribes, and public agencies and officials to develop and implement local solutions for wildfire preparedness – before a fire starts.

Many rural areas lack proper Building, Fire or WUI Codes. A portion of the population feels that since they own the property they should be able to do what they please and suffer the consequences. A growing consensus even in rural areas, however, is that WUI codes may assist in the prevention and impact of wildfires. For example:

- A code that regulates the layout of a structure may help avoid heat traps.
- The establishment of a water supply on properties, which are more than a certain distance from a hydrant or existing natural water supply, can increase the value of the property.
- The requirement for a certain driveway width can allow access for more than fire Department vehicles, as most companies have large vehicles for delivery purposes.
- The establishment of defensible space around structures and improvements that will reduce the potential for damage to property and the environment.

Because of damage from many recent wildfires, the need was identified to adopt statewide Building, Fire and WUI codes. Adopting specific WUI codes for builders and property owners to follow would provide reassurance to homebuyers that their home is safe from many of the natural hazards that exist and to the Gorge Commission that Scenic Area resources are better preserved and protected.

The Scenic Area Management Plan briefly addresses fire protection requirements within the forest land, however, these requirements were established several years ago and have become outdated. New research and data from recent wildfires has prompted the need to revise those standards that are no longer relevant to the ever changing wildland fire environment.

The wildland/urban interface (WUI) is a geographic location where structures and flammable vegetation merge in a wildfire-prone environment. Over the past century, America's population has nearly tripled, with much of the growth flowing into traditionally natural areas. This trend has created an extremely complex landscape that has come to be known as the wildland/urban interface.

Nearly 100,000 wildfires burn approximately 7 million acres of land each year. Most of the past century's wildfire activity has been seasonal in nature. However, recent years have proven otherwise and our nation now experiences fire activity in every month of the calendar year. Encroaching development into forests, grasslands, and farms has put lives, property, and natural resources at risk from wildfire.

As wildfires are growing in scale and duration, and increasing numbers of communities are affected, wildfires are now affecting economies and communities on a much larger scale. Wildland fire impacts are often described in terms of lives threatened, structures and homes lost or damaged, overall suppression costs, and damage to the natural resource base on which many rural communities rely.

Among the negative economic effects for communities, wildfires can burn timber, make recreation and tourism unappealing, and affect agricultural production. Local communities often become concerned about the effects of smoke on health and safety, as well.

Wildfires impact communities in multiple ways, from closing natural areas that residents and tourists visit to damaging homes and harming residents or firefighters. Short- and long-term impacts on recreational activity are quite possible and the closures of these areas often eliminate recreational activity. Many of the local businesses will experience impacts to facilities, shipping delays, and interruptions in employee productivity.

Depending on the severity and location of a wildfire, post-disaster recovery can come with a considerable price tag. Factors that affect state and local budgets in the long-term include: 1) replacement of lost facilities and associated infrastructure; 2) watershed and water quality mitigation; and 3) sensitive species and habitat restoration.

Post-catastrophe management of endangered species and their habitat is an issue as well. Management requires extensive funding for watershed restoration and hazard mitigation efforts. Portions of these funds are used to restore habitat and control the potential impact of erosion and floods in the following seasons. While not easily measured, loss of ecosystem services would be included in the total economic loss.

The best approach to wildfire preparedness involves utilizing the wide range of Fire wise standards and practices. The International Urban Interface Wildland Code (IUIWC) is a standard that regulates building materials that are used in the wildland/urban interface areas and provides for the enforcement of a set of standards for building inspectors (a problem that has been underscored after reviewing damages from wildland fires within recent years). This standard is reviewed and updated on a regular basis.

The National Fire wise Communities Program offers a series of practical steps (landscaping, home construction and design, community planning, etc.) that individuals and communities can take to reduce their vulnerability to wildfire. Using at least one element recommended by the National Firewise Communities Program and adding other elements, such as the (IUIWC), over time will begin to protect against the risk of fire in the wildland/urban interface.

Examples of Firewise techniques for property owners include creating a defensible space around residential structures by thinning trees and brush; choosing fire-resistant plants; selecting ignition-resistant building materials; positioning structures away from slopes; and working with firefighters to develop emergency plans.

After the catastrophic fire season of 1985, representatives of NFPA and the USDA Forest Service met to discuss the increasing trend of wind-driven fire in populated areas, and formed what is now the National Wildland/Urban Interface Fire Program. In 1992, the advisory group for the program adopted the term “Firewise” to describe the state of being knowledgeable and prepared for wildfire in residential or urban settings. In 1999 the advisory group became the Wildland/Urban Interface (WUI) Working Team of the National Wildfire Coordinating Group, which oversees the National Wildland/Urban Interface Fire Program and its Firewise Communities program. The Firewise Web site launched in 1996, and the national workshop series began in 1999. Today, the Firewise Communities team continues its mission of wildland/urban interface fire education through its Web site, workshop series, community recognition program, and information resources.

The Firewise Communities program is part of the National Wildland/Urban Interface Fire Program, which is directed and sponsored by the National Wildfire Coordinating Group’s Wildland/Urban Interface Working Team (WUIWT), a consortium of wildland fire organizations and federal agencies responsible for wildland fire management in the United States. The WUIWT includes:

- USDA Forest Service
- USDI Bureau of Indian Affairs
- USDI Bureau of Land Management
- USDI Fish & Wildlife Service
- USDI National Park Service
- Federal Emergency Management Agency
- International Association of Fire Chiefs
- National Association of State Fire Marshals
- State Forestry Organizations
- National Emergency Management Association
- National Fire Protection Association

Based on the dynamics of the growing wildfire problem that we continue to face within the Columbia River Gorge, we are requesting that you consider the following recommendations for addressing the issues mentioned above:

1. We recommend that the Gorge Commission adopt the National Wildland/Urban Interface Fire Program to include the Firewise Communities Program into the Columbia Gorge National Scenic Area Management Plan.
2. We recommend that the Gorge Commission adopt the International Wildland Urban Interface Building Code into the Columbia Gorge National Scenic Area Management Plan.
3. We recommend that the Gorge Commission adopt an exemption to the emergency response fire suppression procedures and provisions within the Columbia Gorge National Scenic Area Management Plan.

Wildfires are a natural process. It is our vision, based on the recommendations above, that with adequate planning and cooperation among varying interests, wildfires can occur without disastrous loss of life, property, resources and the environment. The National Firewise Communities Program provides a number of wildland/urban interface resources for firefighter safety, community planning, landscaping, construction, and maintenance to help protect people, property, and natural resources from wildland fire.

Additionally, the requirements established in the International Wildland Urban Interface Building Code can effectively reduce losses and damage from wildfires. We are proposing that the Gorge Commission take a proactive, community-based approach to our wildfire problem so we may better protect and preserve the lives, property and resources that are encompassed within the Columbia River Gorge Scenic Area. Your time and consideration in regards to this important issue is greatly appreciated. Thank you.

Respectfully submitted,

Jack Frakes
Dufur Fire Chief

160 NE First Street, PO Box 145
Dufur, OR 97021
Phone 541-467-2349 * Fax 541-467-2353



FRIENDS OF THE COLUMBIA GORGE

March 8, 2017

Krystyna Wolniakowski
Executive Director
Columbia River Gorge Commission
P.O. Box 730
White Salmon, WA 98672
planreview@gorgecommission.org

Lynn Burditt
Columbia River Gorge NSA Area Manager
United States Forest Service
902 Wasco Avenue, Suite 200
Hood River, OR 97031
lburditt@fs.fed.us

Subject: Scoping for the review of the Management Plan

Dear Ms. Wolniakowski and Ms. Burditt:

Friends of the Columbia Gorge and Oregon Physicians for Social Responsibility (collectively “Friends”) submit these comments on the scope of review for the Management Plan for the Columbia River Gorge National Scenic Area (“Management Plan”). Friends of the Columbia Gorge is a nonprofit groups with 6,000 members dedicated to protecting the outstanding resources of the Columbia River Gorge area. Oregon Physicians for Social Responsibility, comprised of approximately 2,500 health professionals and public health advocates working collaboratively to protect the health of all Oregonians, works to protect human life from the gravest threats to health and survival by striving to protect our climate and advance environmental health.

This list encompasses Friends initial thoughts on scoping. As plan review proceeds, it is possible that other issues that need attention will percolate to the surface. In the meantime, please consider the following issues in the scope of review for the Management Plan.

Public involvement

The Columbia River Gorge National Scenic Area is one of our nation’s natural scenic treasures. Issues involved in monitoring implementation, review, and revision of the National Scenic Area Management Plan are issues of national significance.

The Management Plan, page IV-1-2, states the following:

Once the Gorge Commission has adopted the Management Plan and the counties have put the ordinances in place to give it effect, Congress and the people of the Gorge and nation are entitled to know whether the Management Plan is working.

In its scoping for the review of the Management Plan, the Commission and Forest Service have held plan review listening sessions in Hood River, Skamania, and Wasco counties, but have not solicited the concerns of the residents in the other three gorge counties in the same manner, let alone throughout the region or the nation. At a minimum, Friends recommends that the Commission and Forest Service hold additional listening sessions in Portland and Vancouver to broaden participation in the review of the Management Plan.

Monitoring implementation of the Management Plan

The Management Plan, pages IV-1-3–IV-1-4, requires the Gorge Commission and Forest Service to establish and carry out a program of monitoring and evaluating the implementation of the Management Plan. To accomplish the purposes of the Management Plan monitoring and evaluation program the Management Plan requires up-to-date inventories:

In cooperation with the Forest Service, the Gorge Commission shall keep current and work to improve the database in the inventories that form the basis of the Management Plan.

Management Plan, p. IV-1-4. Friends requests that the inventories be updated before scoping is complete.

Inventories

1. The Commission and Forest Service should complete a build-out projection report **before** reviewing and revising the Management Plan.
2. All resource inventories should be updated prior to the review and possible revision of the Management Plan.

In addition, Friends requests inclusion of the following items in the current review of the Management Plan.

General Land Use Planning

1. Prohibit new mining and quarry operations in the National Scenic Area. Prohibit the expansion of existing quarries.
2. Prohibit inappropriate commercial uses in rural areas that are not zoned commercial or rural center. Such uses include construction businesses, travelers' accommodations, fish processing plants, businesses that host large events or cater to large crowds, and new educational buildings.
3. Consider zoning lands acquired by public agencies as open space or recreation, based on the land use designation policies.

4. Cluster developments: Prohibit cluster developments with bonus lots and dwellings on lands zoned for agriculture and forest uses. Define the term “cluster.” Clarify that all criteria must be met to approve a cluster development.
5. Geohazards: The Columbia River Gorge is very geologically active. Inventory, protect, and avoid siting development in geohazard areas.
6. Cumulative effects: Revise the glossary definition to include consideration of past, present, and reasonably foreseeable future actions and effects, and to clarify that cumulative effects review is not limited to “the same piece of ground.”
7. Railroads: Clarify that new rail development, including new tracks, are not allowed in open space and public recreation zones. Explicitly require Gorge-wide cumulative effects analysis for rail expansion projects. Require river access improvements to be provided with rail expansion projects.
8. Coal trains: Currently, coal trains with open-topped coal cars pollute gorge lands and waters with tremendous amounts of coal. Adopt policies and guidelines prohibiting coal pollution in the Columbia Gorge.
9. Oil trains: Since 2012, unit trains, each carrying 3 million gallons of oil, travel through the Columbia River Gorge National Scenic Area. In 2016, an oil train derailed in Mosier, spilling 42,000 gallons of oil and endangering local residents. Require railroads to develop oil spill contingency plans, provide funding for oil-spill emergency response, and carry enough insurance to respond to worst-case derailments and oil spills.
10. Prohibit commercial logging on Forest Service and state lands within the SMAs.
11. Accessory structures: Tighten guidelines to ensure that accessory structures are not used as dwellings. Refer to recent amendments to Multnomah County’s ordinance for an example.
12. Changes in use: Clarify that any changes in the use of existing buildings, roads, and other structures (*e.g.*, a change from residential to industrial or commercial) requires Scenic Area review.
13. Complete Land Use Applications: Promote uniformity throughout the Scenic Area by adopting minimum requirements for completing a Scenic Area land use application. Include a requirement for applicants and property owners (including holders of conservation easements) to sign or consent to land use applications, thus protecting property owners’ rights in the land use review process.
14. Forest Service Consistency Determinations: Include in the Plan chapter on the Forest Service Role (Part IV, Chapter 2) a discussion of the Forest Service’s important federal consistency review obligations required by section 14(d) of the Scenic Area Act.
15. Review Uses: The Oregon Supreme Court held in *Friends of the Columbia Gorge, Inc. v. Columbia River Gorge Comm’n*, 346 Or 415, 427, 212 P3d 1243 (2009), that where the Management Plan specifies that a review use “shall” be allowed or permitted, the Plan “unambiguously requires the counties to permit [such] uses.” Respond to this holding by revising the word “shall” to “may” for appropriate review uses that the Plan currently says “shall be permitted” or “shall be allowed,” thus protecting county discretion to deny uses where appropriate.
16. Enforcement: Specify that no new land use or development activities can be approved on properties with outstanding land use violations until the violations are resolved.
17. Do not reduce minimum lot sizes. New development should be encouraged to occur in existing Urban Areas and not on National Scenic Area lands.

Scenic Resources

1. **Landscape settings:** Determine whether the current system of requiring new development to be visually subordinate to its landscape setting is protecting scenic resources. For example, there may be multiple landscape settings, including woodland, pastoral, and residential, within a viewshed seen from a key viewing area. The observer sees the greater landscape in a viewshed, not as individual landscape settings. The Management Plan artificially segments scenic landscapes into smaller landscape settings with varying degrees of protection.
2. **Compatibility:** Under GMA Guideline 2, new development is required to be compatible with the general scale of existing nearby development to the maximum extent practicable. The terms “compatible” and “nearby” lack definitions and are not consistently applied. These terms need definitions and “maximum extent practicable” should be deleted. The compatibility requirement needs to be added to the SMA guidelines.
3. **Protect natural landscape features:** Require protection of natural features of landscapes rather than developed settings and features.
4. **Incorporate the Oregon Supreme Court’s decision** that GMA Policy 1 requires developments to comply with applicable scenic standards or be denied, even if draconian measures are necessary to condition a project to comply with the scenic standards.
5. **Railroads:** Clarify that new rail development, including new tracks, must meet the applicable scenic standard in all zones. Evaluation of the scenic impacts must include the trains that would travel on the new rail development.
6. **New roads and parking areas:** Clarify that the evaluation of new roads and parking areas for compliance with the applicable scenic standard must include the vehicular use of the road or parking area.
7. **Cumulative effects:** The Act prohibits adverse effects to scenic resources. The Management Plan currently requires evaluation of cumulative effects, but does not explicitly prohibit adverse effects to scenic resources. It does not contain guidance on how this evaluation should be carried out. Clear standards must be developed so that cumulative impacts of development can be assessed and avoided, or the proposed use must be denied. Currently, there are no guidelines for determining what causes adverse cumulative impacts, how to measure cumulative impacts, and how much cumulative impacts are allowed.
8. **Avoiding cumulative effects:** Develop a system to avoid cumulative adverse effects by assigning additional measures to new development in areas that are near or beyond the visual subordination threshold. These could include assigning a stricter scenic standard, requiring siting to minimize visibility, and requiring additional mitigation or offsets.
9. **Key viewing areas:** New key viewing areas should be designated to protect scenic viewpoints and corridors, such as Corbett Hill Road, the GMA portion of County Road 1230, U.S. Hwy 197, and Dalles Mountain Road.
10. **Review developed settings and clarify the boundaries** to better protect scenic resources.
11. **In the SMAs, prioritize topography over vegetation** to achieve the applicable scenic standard.
12. **Topography and Vegetation:** Under GMA Guideline 6, topography should be given a higher priority over existing vegetation for siting new developments.
13. **Guidelines for New Landscaping:** Reduce the deadline for planting new landscaping from five years from commencement of construction to two years.

14. Reflectivity: In GMA Guideline 13, “nonreflective” and “low reflective” are not defined and are too vague. These terms need to be defined in the Plan. The amount of surface area exposed to KVAs must be considered in calculating reflectivity.
15. Screening vegetation: Require coniferous trees, rather than deciduous trees, to provide year-round screening for new development.
16. No SMA grading guidelines: Substantive standards regulating grading need to be added to the SMA guidelines.
17. Air pollution and visibility impairment: Amend the air quality language to contain substantive standards for visibility protection.

Natural Resources

1. Update the inventories and guidelines to reflect current species and habitat status.
2. Expand buffers and protection for important fish, wildlife, and rare plant habitat to reflect the best available science.
3. Expand water resource buffers based on the best available science. Make the buffers mandatory.
4. Expand wetland buffers based on the best available science. Make the buffers mandatory.
5. GMA wetlands: Prohibit the loss of wetlands in the GMA.
6. GMA wetlands public interest test: Delete consideration of the economic value of the proposed use when determining the public interest. The current policy violates the provision of the Scenic Area Act that only “allows future economic development in a manner consistent with” protecting the scenic, natural, cultural, and recreational resources of the Scenic Area. 16 U.S.C. § 544a.
7. Water resource protection: Delete SMA water resource policies 5 and 6 because they could allow adverse effects to water resources.
8. SMA logging: Improve logging regulations to better ensure the protection of water quality and habitat for fish, wildlife, and rare plants.
9. Eliminate clearcutting as an allowed method of timber harvest in the Special Management Areas.
10. Develop clear policies and guidelines for the protection and enhancement of biodiversity.
11. Native plants: Identify significant native plant communities and require their protection.
12. Geologic resources: The Columbia River Gorge is an outstanding geologic resource, but the Management Plan lacks policies and guidelines to protect these resources. Add policies and guidelines to protect outstanding and unique geologic features, such as the Bonneville slide area.
13. Livestock Grazing: Protect natural resources by requiring new commercial-scale livestock grazing to be a review use in all land use designations.
14. Protect stream buffers: Prohibit new agricultural uses and cattle grazing within stream buffers.
15. Culverts: Require consistent review of the replacement or expansion of culverts.
16. Columbia River: The Plan lacks policies and guidelines for new uses within the Columbia River, even though it is part of the National Scenic Area. Add policies and guidelines to protect the river and its aquatic life.
17. Climate change: The Management Plan is devoid of standards addressing climate change. Add standards to evaluate and avoid worsening climate change, especially for major

development projects. Promote small-scale residential renewable energy, consistent with all the resource protection guidelines in the Management Plan.

18. Air quality: Adopt as part of the Management Plan the significance thresholds and overall goal of continued improvement in visibility in the National Scenic Area established by the Columbia River Gorge Air Study and Strategy (Sept. 2011).

Recreation Resources

1. Greater emphasis needs to be placed on protecting and enhancing appropriate recreational uses and acquiring land for recreational purposes.
2. The Recreation Development Plan needs to be part of the Management Plan and needs to be revised to assure consistency with scenic, natural, and cultural resource policies and guidelines; new environmental regulations; and ecosystem protection concepts. It should also be reviewed and revised based upon new recreational opportunities, demand, and visitor expectations.
3. Recreation resources are not adequately protected within the National Scenic Area. Areas adjacent to recreational sites need better protection. One way to accomplish this is to zone these areas as Open Space to preclude clearcutting, mining, and new development. For example, clearcutting along the Pacific Crest Trail has severely impacted the recreational experience for hikers along sections of the trail.
4. Support policies for trail systems linking recreation sites, viewpoints, and Gorge communities. This supports both purposes of the Act.
5. Promote more dispersed recreation by supporting new recreation sites and discouraging overuse of existing sites.
6. Support sustainable recreation through alternative transportation options.
7. Improve river access but avoid adverse impacts to sensitive resources and treaty rights.

Cultural Resources

1. Cultural resource surveys: Until a thorough survey of cultural resources is completed in the Gorge, reconnaissance surveys should be required prior to the approval of new land divisions and ground-disturbing uses or developments. Too often, planning departments conclude that an area has a low probability for cultural resources and approve new development without requiring the area to be adequately surveyed. Because land divisions determine future development sites, reconnaissance surveys should be required for land divisions. Once the land division is approved it is much more difficult to avoid cultural resource sites. This is especially true on small lots.
2. Cumulative effects: Prohibit cumulative adverse effects to cultural resources.
3. Require protection of first foods, as determined and defined by the tribes along the Columbia River.
4. Treaty rights: Ensure protection of treaty rights and tribal access to the Columbia River and other sites.

Agricultural Land

1. Prohibit lot-of-record dwellings on agricultural lands.
2. Prohibit cluster developments with bonus lots and dwellings.
3. Identify high-value farm land and provide additional protections.
4. Strengthen the farm dwelling standards by changing the capability test to a production test and increasing the gross annual income threshold for prime and unique farmland to at least \$80,000.
5. The Small-Scale Agriculture policies and guidelines should be reviewed and revised. The current policies and guidelines for this land use designation do not adequately protect agricultural land.
6. Farm labor dwellings: Clarify that farm labor dwellings must be necessary and accessory to a commercial agricultural use on the subject farm or ranch that meets the same requirements as for agricultural dwellings (such as the income capability test). Clarify that “necessary” means that there are no other dwellings on the farm that are not currently used for agriculture and that the agricultural use must be full-time and must meet the applicable income standard.
7. Delete GMA Agriculture Guideline K, which allows nonfarm dwellings for agricultural operator’s relatives.

Open Space

1. Designate more lands that are suitable for protection and enhancement as Open Space. These include the Memaloose and Rowena areas for rare plant and native plant protection, and the Pacific Crest Trail for recreation.
2. Develop public acquisition plans for all lands zoned as Open Space.

Thank you for the opportunity to comment and for considering inclusion of these important issues in the scope of plan review.

Sincerely,



Steven D. McCoy
Staff Attorney
Friends of the Columbia Gorge



Regna Merritt, PA
Healthy Climate Program Director
Oregon Physicians for Social Responsibility



Hood River County Community Development

Planning, Building Codes, Code Compliance, Economic Development & Veterans' Services

601 State Street, Hood River OR 97031

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

March 8, 2017

Columbia River Gorge Commission
c/o Krystyna Wolniakowski, Executive Director
1 Town & Country Square
57 NE Wauna Avenue
White Salmon, WA 98672

Re: Comments to the Columbia River Gorge Commission
Gorge 2020 Management Plan Review and Update

To the Columbia River Gorge Commission:

Thank you for the opportunity to provide formal comments on Gorge 2020, the update to the Management Plan for the Columbia River Gorge National Scenic Area. The Gorge is a natural gem with unique regional, national and international significance. As such, Hood River County recognizes the importance of this update and fully supports the required review and process. To date, the County has participated in a Gorge 2020 public scoping meeting / listening session and have met with Gorge Commission staff one-on-one to discuss updates. Furthermore, we intend to stay involved to help the Gorge Commission meet their desired goals and timeline to update the Management Plan.

The County's Planning Department has a long standing history and breadth of local experience in the most fundamental aspect of implementing the National Scenic Area (NSA) Act and Management Plan: reviewing land use applications. Each year, NSA land use applications account for approximately 5% of the County's Planning Department's total applications received. These development reviews, although typically straightforward, require a disproportionately large and significant amount of time to process and review. To be candid, the County's Planning Department continues to not have sufficient staffing resources available to process NSA land use applications in an efficient or expedited manner.

In light of the County's extensive experience with development review in the NSA, we feel the process is particularly burdensome for minor projects, involves a lot of redundancy, and contains circuitous requirements that could be removed. The County has a host of suggestions that would address our concerns and help improve the overall efficacy of development review.

The County's comments are divided into two categories: 1) guiding principles; and 2) specific

recommendations and technical changes related to the guiding principles. Our specific recommendations and technical changes are organized by the identified guiding principles and provided in an attachment to this letter.

Hood River County's Gorge 2020 Guiding Principles:

- A. Urban Areas — The ability to expand the Urban Area boundary is critical and should be based on respective community needs.
- B. Development Review — It is imperative to streamline and increase efficiency of development reviews through removing unnecessary processes and provisions and developing more objective standards. Applicants should not be required to go through an exhaustive process for minor projects.
- C. Emerging Uses — Recognize and provide guidance regarding new and emerging uses, industries and agricultural practices.
- D. Historic Columbia River Highway (HCRH) & I-84 — Simplify the review of HCRH and I-84 projects through refinement of applicable standards.

The County recognizes and empathizes with what a big undertaking the Gorge 2020 project is. The existing Management Plan needs a lot of changes, and this process is a great opportunity to address many outstanding issues. Without needed changes to the Management Plan, Hood River County cannot improve how we administer land use within our jurisdiction. The County is committed to continue to work with your staff throughout this process, provide feedback and help with revisions.

The amount of time and volunteer effort each Gorge Commissioner gives to the commission is greatly appreciated. It is no small endeavor engaging in the challenges and dialogue that accompanies the need to balance competing goals and interests in the NSA. Please consider our comments and recommendations as you plan for the future.

Sincerely,

/s/John Roberts

John Roberts

cc: Hood River Board of County Commissioners
Jeff Hecksel, County Administrator, Hood River County
Representative Mark Johnson, OR House District 52
Hood River County Planning Commission
Bridget Bailey, Hood River County Gorge Commission Appointee
Angie Brewer, Wasco County Planning Director

Attachment

Specific Recommendations and Technical Changes Related to Identified Guiding Principles

A. Establish ability to Expand Urban Area (UA) Boundaries

- A clear interpretation of what is a minor amendment to Urban Area boundaries is necessary. The interpretation would provide essential guidance and standards, and does not need to have criteria that are uniformly applied to all thirteen Urban Areas in the Gorge. Standards should recognize local jurisdictions needs and acknowledge other planning efforts. In the case of Hood River, there is a compelling need to expand the Urban Area boundary to possibly incorporate de facto urban reserve land to address a mix of affordable housing and community parks.
- It is recommended to look at the minor expansion to the Cascade Locks Urban Area boundary in 1999 for potential criteria, thresholds and tradeoffs.

B. Streamline Development Review - Review times of land use application are not sustainable

- **Expedited Reviews** – One of the greatest opportunities to streamline development review and increase efficiencies is to expand the list of uses that qualify for expedited review. Examples of requests that could be considered as expedited include:
 - Increasing the size of accessory structures that qualify as expedited.
 - Allow small-scale projects such as decks, porches and garages to qualify as expedited.
 - Allowing new development in “visually exempt” developed settings to be evaluated through an expedited review.
 - Allow for minor variances (up to 10% of the requirement) to be expedited; in order to allow land divisions of property just slightly under the required minimum lots size requirement.
 - Make all highway projects and wells an outright allowed or expedited review use as long as they follow guidelines.
 - Make “in-kind” building replacements an expedited review, especially when destroyed or damaged by a disaster.
 - Allow black, low-reflective solar panels on rooftops without review or expedited review.
- **Other Efficiencies to Consider:**
 - Create a list of non-discretionary uses: uses that qualify for an over-the-counter review without public notice or appeal periods.
 - Subject the Hood River “County Scenic Exempt Area” to lesser standards.

- Temporary Structures: either exempt temporary structures from review entirely or include as part of an expedited review process.
- Remove and extend timelines referenced in the Management Plan that are considered unrealistic. Specifically, the 14-day completeness review, notice within 7-days of receiving an application.
- Develop more objective (and less subjective) measureable standards to address “cumulative effects” guidelines; or eliminate the cumulative effects provision in entirety as implementation is not practical and instead focus on density.
- Remove the compatibility analysis requirements as these are overly subjective, resulting in capricious application.
- Allow “in-kind” building replacements to be exempt from certain scenic, cultural, recreational, and natural resource guidelines. Voluntary replacement should be treated the same as those resulting from a disaster. If replacement is at a different location or significantly larger (10% or more), then full compliance with all guidelines seems more justified.
- Modify Section 154 (Reevaluation of Existing Uses) to allow removal or modification of a prior condition(s) to match current guidelines without requiring full compliance with all current guidelines.
- Eliminate all split-zoned parcels. Move zone boundaries to the centerline of roads or property line boundaries; change the property line adjustment guidelines to prevent adjustments that would result in creating a split-zoned property.
- Remove the “visual subordination” & Key Viewing Area (KVA) requirements and replace with a Geographic Information System-based digital elevation model or similar.
- Make the review of trails easier and more realistic.

C. Recognize and create allowance for emerging uses, industries and agricultural practices

- Explore “similar use determination” standards for new uses that will invariably evolve.
- Create allowances and standards for:
 - Short-Term Rentals (STRs)
 - Distilleries
 - Cideries
 - Farm stands
 - Agri-tourism
 - Concerts/events/festivals
 - Weddings
 - Guest quarters
- Cider: Consider providing provisions, similar to wineries, which allow cideries to be developed in the Large Scale and Small Scale Agricultural zones when provided in

conjunction with on onsite orchard.

- Provide more specific guidelines for cell towers; clarification for collocation (e.g., exempt from review if it doesn't cause the tower to expand or increase its height).
- Explicitly prohibit marijuana businesses and Accessory Dwelling Units (ADUs).
- Consider allowing other types of structures than just manufactured dwellings as "temporary hardship residences." Such structures could include RVs or the use of an existing building. At the same time, consider limiting the size of manufactured homes to singlewides or small doublewides only to minimize costs and encourage their removal when no longer needed.
- Columbia River and Other Waterways:
 - Explicitly prohibit the long-term anchoring of boats in the Columbia.
 - Provide review criteria for development within the Columbia River (GMA Water).
 - Differentiate between naturally occurring and artificial watercourses, such as man-made ditches, ponds and sumps.
- Accessory Buildings:
 - Clarify whether or not full bathrooms (with shower/bathing facilities) should be allowed within an accessory building.
 - Clarify whether or not guest quarters should be allowed within an accessory building.
- Recreation/Trails/Parks:
 - The Management Plan does not make a distinction between private and public ownership of recreation uses listed in the Recreation Intensity Classes. Trails for equestrian use and trailheads (with provisions for hitching rails and equestrian trails at trailheads accommodating equestrian use) may be considered in all the Recreation Intensity Classes, regardless if they are privately or publicly owned.
 - Provide clarity regarding community parks and playgrounds, especially in regard to the current code reference to the "National Park & Recreation Society Guidelines."
 - Recognize the need to update or create a comprehensive trails and trailhead plan, and outdated recreational intensities classifications that are partially irrelevant.

D. Improve guidelines applicable to HCRH and I-84

- Clarify the applicable guidelines that apply to the Historic Columbia River Highway (HCRH) State Trail and new highway projects occurring within the I-84 highway right-of-way. Specifically consider codifying the various visual guidelines included as part of the I-84 Corridor Strategy Guidelines, Historic Highway State Trail Design

Guidelines, and Historic Columbia Highway Master Plan Guidelines. Currently, ODOT assumes these guidelines should be used to evaluate highway and trail related projects, but these guidelines were never formally approved by the Gorge Commission and adopted into the Management Plan. Once codified, consider making all highway projects an outright allowed or expedited review use as long as they follow these guidelines.

- Consider redefining “developed road prism (SMA)” to allow greater leeway in evaluating highway construction project, including the HCRH State Trail. Possibly state that everything located within the highway right-of-way or within 100 feet of the centerline of the highway is automatically within the road prism.
- Codify the HCRH State Trail Way finding Signs either directly or indirectly in the code/Management Plan.
- Clarify whether white guardrails along the HCRH State Trail are permissible regardless of whether they are proposed along a former or new section of highway.

E. Other considerations to improve implementation of Management Plan

- Revise the treaty rights consultation process; ensure local governments are not in a position of liability.
- Reinstigate property acquisition to acquire more SMA land and extinguish development rights; allow those development rights to be transferred to Urban Areas.
- Place more emphasis on ensuring that the Management Plan is implemented consistently throughout the six Scenic Area counties. This would warrant a Gorge-wide compliance program / officer.
- Revisit or reinstitute the USFS policy of acquiring property in the SMA or GMA sites with cultural resources.
- Implement a formal, independent third-party mediation process. This could lessen existing perceptions that “negotiations” with interest groups takes place when making decisions.
- Stipulate in the Management Plan that appeals of Gorge Commission land-use decisions will only be heard by the courts of the state in which the application originated.



KLICKITAT COUNTY
BOARD OF COUNTY COMMISSIONERS



205 S. COLUMBUS AVENUE, ROOM 103, MS-CH-04, GOLDENDALE WASHINGTON 98620 • FAX 509 773-6779 • VOICE 509 773-4612
REX F. JOHNSTON, DISTRICT #1
DAVID M. SAUTER, DISTRICT #2
JIM SIZEMORE, DISTRICT #3

March 7, 2017

Columbia River Gorge Commission
Management Plan Review
P.O. Box 730
White Salmon, Washington

RE: 2017 Management Plan Review

Dear Gorge Commission members:

Thank you for the opportunity to comment on the Management Plan Update. Below are the initial scoping comments, Klickitat County anticipates to providing additional input throughout the update process.

1. Resource Protection and Enhancement

a. Scenic Resources:

- i. Allow development that is consistent with the goal of protecting and enhancing scenic resources.
- ii. Redefine some terms (in the policies) to be more consistent with the Act. For example, the Plan currently stated that adverse impacts should be avoided to the “maximum extent practicable” or “maximum extent feasible”. The term should be replaced with the terminology from the Act that defines adversely affect as “a reasonable likelihood of more than moderate adverse consequence”. This would require revision throughout the Plan e.g. impacts to cultural resources, recreational resources, natural resources, etc.
- iii. Reclamation of rock quarries should not be required to “emulate surrounding landforms”, but merely “blend in”.
- iv. To provide predictability in the permitting process and uniform decisions “key viewing areas” should have a more precise definition so that any random place with some view of the Gorge is not used to condition a project, e.g. areas that are viewed from two or more points that are regularly accessed by the public through pedestrian or parked vehicle access.
- v. Language in objectives intended to phase out existing quarries needs to be deleted, as phasing out quarries is contradictory to the Act’s dual objectives of protecting natural resources and the economy.
- vi. The Plan limits development on “steeply sloping lands” – the term needs to be defined.

- vii. The requirement that construction materials be “non-reflective” needs to be deleted, as all standard building materials have a degree of reflectivity. The requirement to use materials that are non-reflective is not in sync with standard design and standard materials used in construction. Some, such as glass, are routinely used for windows. This provision could be read to preclude use of this material, yet to have homes without windows would preclude unwanted results.
 - viii. Property owners should be able to have a view of the Gorge from their residences because one of the reasons for living in the Gorge area is the scenery. The scenery should be enjoyed by those who live there as well as visitors. Variance criteria needs to be expanded to include approval where the owner of a home would be deprived of a view of the Gorge.
 - ix. The required colors of structures should be changed from “dark earth-tones” to colors that “blend with the natural setting”, and ‘a project proponent will have flexibility in choosing colors consistent with this standard”.
 - x. Delete requirements that the general scale (height, dimensions, overall mass) be compatible with development in the vicinity. Requiring buildings to be consistent with nearby development can be interpreted in many different ways and lead to unpredictability in the permitting process. Generally, local development regulations will ensure that new development is consistent with the plan for the area. This coupled with guidelines applicable to the particular Management Plan designation should accomplish the purpose of this Guideline.
 - xi. Property owners that are performing routine maintenance or repair should not be subject to permitting process because this discourages building upkeep. Legal non-conforming uses should be able to be replaced or modified so long as the replacement is not larger than the original use and is similar in use and design to the non-conforming structure. That way owners are not discouraged from replacing buildings that are becoming dilapidated for fear of an onerous permitting process.
- b. Wildlife Habitat:
- i. In regard to conditioning of permits for development: If a project is conditioned based upon a wildlife inventory or wildlife overlay, that overlay or inventory must be promulgated as a government rule and kept on file for public review at the Gorge Commission.
- c. Natural Resources/Recreation Resources:
- i. Amend goal of protecting and enhance these resources to include “and promote the local economy”.
- d. Agricultural Land:
- i. Amend “uses allowed outright” to include “modification, expansion, replacement, or reconstruction of serviceable structures” and “new cultivation or conversion from one agricultural use to another”.
 - ii. The definition of a commercial farm or agricultural operation is overly restrictive. Because of the cyclical nature of the farming industry as well as unpredictable weather patterns there is not always significant income from farming. Using an averaging method would allow for these unpredictable events but would also achieve the guideline’s purpose by not allowing for the person who merely farms for pleasure or recreation.

- iii. Allow for additional dwelling on farm parcels. There are numerous provisions that make it difficult to live and work on a farm. It makes little sense to force family members and farm workers to travel to work every day when they could live on the farm.

e. General Policies

- i. Expand list of uses exempt from review and utilize checklist to determine if proposal meets exemption criteria, e.g., projects that are simply maintenance and/or repair; or involving in-kind replacement of legal, non-conforming use where the new structure is not more than 100% of the original structure should not require an application.
- ii. One of the goals of the Act is to promote economic development. Traditional economic activity such as cattle ranching and low impact opportunities should be recognized, encouraged and supported.
- iii. Add a policy recognize the natural resource management and utilization activities (timber management/harvest, rock extraction, agriculture activities are economic activities that are consistent with the purpose of the Act and should be allowed.
- iv. Ranchers and farmers who know and understand the land should be consulted and provide insight on how best to manage it. Add a policy that the Commission shall establish an advisory committee of ranchers and farmers to assist in management and enhancement of public lands for continued historic and traditional uses within the Scenic Area; the Commission should provide support efforts to make public land available for historic and traditional uses (i.e. "local custom and culture").
- v. Add a provision recognize the public health and safety issues may sometimes take precedence over preservation of views and aesthetics.
- vi. RCW 90.58.020 states that "It is the policy of the state to provide for the management of the shorelines of the state by planning for and fostering all reasonable and appropriate uses. This policy is designed to insure the development of these shorelines in a manner which, while allowing for limited reduction of rights of the public in the navigable waters, will promote and enhance the public interest". It is less restrictive than the language in the Management Plan. Some discretion must be given to local jurisdictions as there are property uses along the Columbia River's shoreline which may not fit the current definition but are appropriate for a variety of reasons and may even increase public enjoyment of the water. The current mandate affords no flexibility to local circumstances.

f. Administration

- i. The Act was adopted to achieve two distinct and equally important purposes: (1) to "protect" and "enhance" the "scenic, cultural, recreational and natural features of the Columbia River Gorge;" and (2) "To protect and support the economy of the Columbia River Gorge Area" by "encouraging growth", and "allowing future economic development in a manner consistent with paragraph (1)." There is currently a broad diversity of activity within the Gorge: agricultural, commercial, residential, recreational uses all exist. The Act itself provides that the Management Plan is to regulate development (commercial and residential) in a way that does not have "more than moderate adverse consequences for the scenic, cultural, recreation or natural resources of the scenic area..." This standard does not prohibit development. Instead, consistent with the purpose section quoted above, it permits development that does not adversely affect the Scenic Area's resources.
- ii. Revise criteria for revising Urban Area Boundaries e.g. boundaries are to coincide with service boundaries, property lines, natural boundaries, roads. The Management Plan

should allow some flexibility in making minor revisions to the Urban Area boundaries. The current system makes revisions to areas that should be inside of Urban Areas impossible and results in land use planning that is at odds with both development and geography.

- iii. Development Review and Expedited Development Review process provisions should be reviewed and revised. The permit process should be predictable and the processing time should be defined and measurable. An action plan that would detail specific performances of the Commission should be included.
- iv. The issues of finality of decision needs to be addressed. Vested rights doctrine should apply in the scenic area. Final determination of legal parcels should rest with local jurisdictions.
- v. The Management Plan should be written as a guidance document which establish the official policy of the scenic area and presents goals and a vision for the future that guides official decision making, and not as a regulatory document.

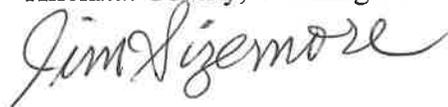
g. Glossary

- i. Add/amend definitions for agricultural use, historic and traditional uses, key viewing, new development, overlay, screening, standard construction materials, traditional uses.

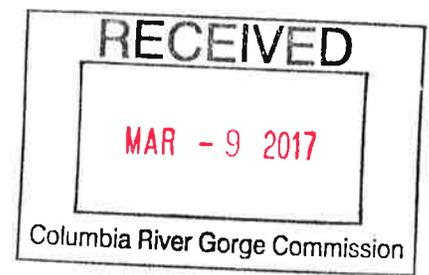
Thank you for the opportunity to submit our comments.

Sincerely,

BOARD OF COUNTY COMMISSIONERS
Klickitat County, Washington



Jim Sizemore, Chairman



March 8, 2017

Columbia River Gorge Commission
c/o Krystyna Wolniakowski, Executive Director
1 Town & Country Square
57 NE Wauna Avenue
White Salmon, WA 98672

Subject: Commenting on 'Gorge 2020' Management Plan Review and Update

I believe the stated mission of the Scenic Act is:

"To protect and support the economy of the Gorge by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with protection of scenic, cultural, recreation, and natural resources [Section 3(2)]."

In the years since the Scenic Act was implemented, the Gorge has grown tremendously. The wine industry, Boeing, recreation, and fruit tours are examples of industrial and recreational growth. At the time of enactment, no one could have predicted the Gorge would become one of the premier wind recreation areas in the world. This growth is now straining the existing urban areas.

Supporting the economy of the Gorge but limiting growth to existing urban areas is a contributing factor in the housing crisis. I have heard of teachers moving out of the region because they could not find affordable housing. Our teachers, public servants and service workers are having to commute long distances or move out of the area to survive. The median income for Klickitat County is around \$49,000. Housing costs and rent are skyrocketing. Last month a friend of mine listed a small house online for rent in White Salmon. It was rented in 20 minutes! The young couple were ecstatic to find a place. They were commuting two hours each way to work in Bingen.

As a member of the Mid-Columbia Housing Authority/Columbia Gorge Housing Authority, I have heard business owners state that lack of housing is hurting them financially. Klickitat County Commissioner, David Sauter, stated in our last meeting that housing has become their number one priority. MCHA/CGHA has a very difficult task finding affordable housing for Section 8 participants.

It is vital the plan reflect the changing economies and rapid growth in the Gorge. Planned growth and urban expansion are critical to the entire region.

A handwritten signature in blue ink that reads "Rosemary Hoyt". The signature is fluid and cursive.

Rosemary Hoyt,
Executive Board Member MCHA/CGHA

MID-COLUMBIA



FIRE & RESCUE

1400 West Eighth Street
The Dalles, Oregon 97058
541-296-9445 • Fax: 541-296-8656

March 5, 2017

Columbia River Gorge Commission
57 NE Wauna Avenue
P.O. Box 370
White Salmon, WA 98672
E-Mail: planreview@gorgecommission.org

Re: Columbia River Gorge Commission Management Plan Review

To Whom it May Concern,

The Columbia Gorge National Scenic Area has certainly experienced its share of wildland fires over the past several years. Wildfire can have a positive and cleansing effect on the landscape, however, the disaster sequence starts when a wild fire or multiple wildfires burn during extreme fire conditions. The combination of extreme vegetation, weather, and topographic conditions given a fire start produces fast-spreading, intensely burning fires that overwhelm wildfire suppression efforts. If extreme wildfire spreads close enough to residential development with its flames and firebrands, hundreds of ignitable homes can be simultaneously exposed.

Unfortunately, once a wildfire ignites, firefighters are limited in what they can do to protect the values in its path. The National Fire wise Communities Program is a national interagency program that encourages partnerships among communities, homeowners, private industry, tribes, and public agencies and officials to develop and implement local solutions for wildfire preparedness – before a fire starts.

Many rural areas lack proper Building, Fire or WUI Codes. A portion of the population feels that since they own the property they should be able to do what they please and suffer the consequences. A growing consensus even in rural areas, however, is that WUI codes may assist in the prevention and impact of wildfires. For example:

- A code that regulates the layout of a structure may help avoid heat traps.
- The establishment of a water supply on properties, which are more than a certain distance from a hydrant or existing natural water supply, can increase the value of the property.
- The requirement for a certain driveway width can allow access for more than fire Department vehicles, as most companies have large vehicles for delivery purposes.

- The establishment of defensible space around structures and improvements that will reduce the potential for damage to property and the environment.

Because of damage from many recent wildfires, the need was identified to adopt statewide Building, Fire and WUI codes. Adopting specific WUI codes for builders and property owners to follow would provide reassurance to homebuyers that their home is safe from many of the natural hazards that exist and to the Gorge Commission that Scenic Area resources are better preserved and protected.

The Scenic Area Management Plan briefly addresses fire protection requirements within the forest land, however, these requirements were established several years ago and have become outdated. New research and data from recent wildfires has prompted the need to revise those standards that are no longer relevant to the ever changing wildland fire environment.

The wildland/urban interface (WUI) is a geographic location where structures and flammable vegetation merge in a wildfire-prone environment. Over the past century, America's population has nearly tripled, with much of the growth flowing into traditionally natural areas. This trend has created an extremely complex landscape that has come to be known as the wildland/urban interface.

Nearly 100,000 wildfires burn approximately 7 million acres of land each year. Most of the past century's wildfire activity has been seasonal in nature. However, recent years have proven otherwise and our nation now experiences fire activity in every month of the calendar year. Encroaching development into forests, grasslands, and farms has put lives, property, and natural resources at risk from wildfire.

As wildfires are growing in scale and duration, and increasing numbers of communities are affected, wildfires are now affecting economies and communities on a much large scale. Wildland fire impacts are often described in terms of lives threatened, structures and homes lost or damaged, overall suppression costs, and damage to the natural resource base on which many rural communities rely.

Among the negative economic effects for communities, wildfires can burn timber, make recreation and tourism unappealing, and affect agricultural production. Local communities often become concerned about the effects of smoke on health and safety, as well.

Wildfires impact communities in multiple ways, from closing natural areas that residents and tourists visit to damaging homes and harming residents or firefighters. Short- and long-term impacts on recreational activity are quite possible and the closures of these areas often eliminate recreational activity. Many of the local businesses will experience impacts to facilities, shipping delays, and interruptions in employee productivity.

Depending on the severity and location of a wildfire, post-disaster recovery can come with a considerable price tag. Factors that affect state and local budgets in the long-term include: 1) replacement of lost facilities and associated infrastructure; 2) watershed and water quality mitigation; and 3) sensitive species and habitat restoration.

Post-catastrophe management of endangered species and their habitat is an issue as well. Management requires extensive funding for watershed restoration and hazard mitigation efforts. Portions of these funds are used to restore habitat and control the potential impact of erosion and floods in the following seasons. While not easily measured, loss of ecosystem services would be included in the total economic loss.

The best approach to wildfire preparedness involves utilizing the wide range of Fire wise standards and practices. The International Urban Interface Wildland Code (IUIWC) is a standard that regulates building materials that are used in the wildland/urban interface areas and provides for the enforcement of a set of standards for building inspectors (a problem that has been underscored after reviewing damages from wildland fires within recent years). This standard is reviewed and updated on a regular basis.

The National Fire wise Communities Program offers a series of practical steps (landscaping, home construction and design, community planning, etc.) that individuals and communities can take to reduce their vulnerability to wildfire. Using at least one element recommended by the National Firewise Communities Program and adding other elements, such as the (IUIWC), over time will begin to protect against the risk of fire in the wildland/urban interface. Examples of Firewise techniques for property owners include creating a defensible space around residential structures by thinning trees and brush; choosing fire-resistant plants; selecting ignition-resistant building materials; positioning structures away from slopes; and working with firefighters to develop emergency plans.

After the catastrophic fire season of 1985, representatives of NFPA and the USDA Forest Service met to discuss the increasing trend of wind-driven fire in populated areas, and formed what is now the National Wildland/Urban Interface Fire Program. In 1992, the advisory group for the program adopted the term "Firewise" to describe the state of being knowledgeable and prepared for wildfire in residential or urban settings. In 1999 the advisory group became the Wildland/Urban Interface (WUI) Working Team of the National Wildfire Coordinating Group, which oversees the National Wildland/Urban Interface Fire Program and its Firewise Communities program. The Firewise Web site launched in 1996, and the national workshop series began in 1999. Today, the Firewise Communities team continues its mission of wildland/urban interface fire education through its Web site, workshop series, community recognition program, and information resources.

The Firewise Communities program is part of the National Wildland/Urban Interface Fire Program, which is directed and sponsored by the National Wildfire Coordinating Group's Wildland/Urban Interface Working Team (WUIWT), a consortium of wildland fire organizations and federal agencies responsible for wildland fire management in the United States. The WUIWT includes:

- USDA Forest Service
- USDI Bureau of Indian Affairs
- USDI Bureau of Land Management
- USDI Fish & Wildlife Service
- USDI National Park Service
- Federal Emergency Management Agency
- International Association of Fire Chiefs

- National Association of State Fire Marshals
- State Forestry Organizations
- National Emergency Management Association
- Association
- National Fire Protection Association

Based on the dynamics of the growing wildfire problem that we continue to face within the Columbia River Gorge, we are requesting that you consider the following recommendations for addressing the issues mentioned above:

1. We recommend that the Gorge Commission adopt the National Wildland/Urban Interface Fire Program to include the Firewise Communities Program into the Columbia Gorge National Scenic Area Management Plan.
2. We recommend that the Gorge Commission adopt the International Wildland Urban Interface Building Code into the Columbia Gorge National Scenic Area Management Plan.
3. We recommend that the Gorge Commission adopt an exemption to the emergency response fire suppression procedures and provisions within the Columbia Gorge National Scenic Area Management Plan.

Wildfires are a natural process. It is our vision, based on the recommendations above, that with adequate planning and cooperation among varying interests, wildfires can occur without disastrous loss of life, property, resources and the environment. The National Firewise Communities Program provides a number of wildland/urban interface resources for firefighter safety, community planning, landscaping, construction, and maintenance to help protect people, property, and natural resources from wildland fire.

Additionally, the requirements established in the International Wildland Urban Interface Building Code can effectively reduce losses and damage from wildfires. We are proposing that the Gorge Commission take a proactive, community-based approach to our wildfire problem so we may better protect and preserve the lives, property and resources that are encompassed within the Columbia River Gorge Scenic Area. Your time and consideration in regards to this important issue is greatly appreciated. Thank you.

Respectfully submitted,



Robert F. Palmer
Fire Chief



March 8, 2017

Columbia River Gorge Commission
c/o Krystyna Wolniakowski, Executive Director
1 Town & Country Square
57 NE Wauna Avenue
White Salmon, WA 98672

Re: Commenting on Columbia River Gorge National Scenic Area Act Management Plan Review and Update

Chair Blair and Columbia River Gorge Commissioners:

Thank you for the opportunity to comment on 'Gorge 2020', the update to the Management Plan for the Columbia River Gorge National Scenic Area Act ('the Act'). We value the uniqueness of The Gorge it's natural landscapes as well as regional, national and international significance. Mid-Columbia Housing Authority (MCHA) and Columbia Gorge Housing Authority (CGHA) appreciate our regional partnership and collaborative approaches to the second of the Act's two stated purposes;

"To protect and support the economy of the Gorge by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with protection of scenic, cultural, recreation, and natural resources [Section 3(2)]."

CGHA and MCHA recognize the importance of your efforts to review the Act's management plan and fully support the review and update. Our organizations have participated in the listening sessions and have met with Gorge Commission staff to discuss updates and will stay engaged in this process as a regional partner.

We respectfully request the Columbia River Gorge Commission incorporate existing economic development plans in a manner that allows the management plan to act as a living document and reflect changing economies in the Gorge. The bi-state region develops and continually refines its vision and economic roadmap through the Columbia Gorge Comprehensive Economic Development Strategy. It is imperative to align with the existing regional economic development planning efforts which will allow the Management Plan to be effectively implemented.

Furthermore, we respectfully request the management plan identify a clear process to analyze urban growth boundary modifications and define minor and major amendments. A clear process which, at its core, is based on respective community needs is critical to the economy of the Gorge and would encourage growth to occur in urban areas. Housing is a key element of our regional infrastructure.



500 East 2nd Street, The Dalles, OR. 97058
Deaf Community Relay – (OR) 1-800-735-1232 (WA) 1-800-833-6384
(Phone) 1-541-296-5462 (Toll Free) 1-888-356-8919
(Fax) 1-541-296-8570





Without adequate housing opportunities for all our community members' efforts to promote a diverse and vibrant economy will be stifled.

Finally, we ask you to engage with MCHA and CGHA both in this planning process and throughout the development of plan revisions. Your commitment to balancing competing goals throughout the Gorge National Scenic Area is to be commended. MCHA and CGHA look forward to working together with you and your staff as we update and implement the management plan to the Columbia River Gorge National Scenic Area.

Sincerely,

Joel Madsen
Executive Director

Columbia Gorge Housing Authority and Mid-Columbia Housing Authority promote affordable housing solutions throughout Klickitat, Skamania Counties in Washington and Hood River, Wasco and Sherman Counties in Oregon.



500 East 2nd Street, The Dalles, OR. 97058
Deaf Community Relay – (OR) 1-800-735-1232 (WA) 1-800-833-6384
(Phone) 1-541-296-5462 (Toll Free) 1-888-356-8919
(Fax) 1-541-296-8570



1600 SE 190th Avenue, Portland OR 97233-5910 • PH. (503) 988-3043 • Fax (503) 988-3389

Columbia River Gorge Commission
1 Town & Country Square
57 NE Wauna Ave.
White Salmon, WA 98672

March 7, 2017

RE: Columbia River Gorge Scenic Area Management Plan Review

Commissioners,

Please accept this letter as a summary of the discussion that Multnomah County Land Use Planning had with representatives from the Gorge Commission on February 21, 2017. At this meeting several topics were discussed in reference to the Columbia River Gorge Scenic Area Management Plan Review that is currently taking place. The topics are presented in no particular order of importance.

- **Safety:** The Highway 84 corridor is limited regarding how safety improvements can be made within the NSA. The County this past year received a request from ODOT to approve two (2) safety projects along the corridor. During the review process we determined that one of the proposed improvements could not be permitted due to the limitations of the management plan. A discussion regarding safety versus aesthetics should occur. Should more discretion be permitted regarding safety improvements along the corridor?
- **Mapping and Zoning:** Multnomah County recently with Staff to address several mapping errors within the NSA. There are however still areas that could not be addressed which should be. In addition the current zoning results in some properties having “split zones”. In some instances this was deliberate in order to provide specific zoning for resource areas. It may be appropriate to place resource areas into overlay zones to avoid a split zones. Alternatively there could specific guidance provided on how to deal with split zoned properties.
- **Existing Uses:** One of the complaints we hear from people constructing a new building within the NSA is why it has to be painted, sited and designed to be visually subordinate when the neighbor’s house is white or yellow? Should there be a requirement that moves existing uses closer to conformity?
- **Building sizing and massing:** Should there be a standardized way to determine building size that is applied uniformly throughout the NSA? Does the 1500 sq ft limitation on accessory structures work? Should there be more flexibility in accessory structures for uses such as home occupations? Should there be more limitations for standard residential uses? How can these standards be designed to address the issues of cumulative impacts?
- **Planting Lists for Mitigation:** It may be an appropriate time to revisit the planting lists for mitigation with emphasis on adding more species of trees, shrubs, and groundcovers.
- **Non Discretionary Review Process:** One of the complaints we hear from applicants is that the process and timeline for review is complicated and costly. Development of clear and objective standards for implementation allow for non-discretionary reviews. These

processes can make it easier for an applicant to prepare and application, simplify the review, lower the cost of the review, and remove the need for an appeal process. Identification of additional products/samples that can be used to satisfy requirements in the NSA could be used to assist with streamlining some decisions.

- Parking and Access along the Historic Columbia River Highway. People are currently parking and walking along the side of the roadway. This can be dangerous for the people walking and can result in delays along the corridor for people traveling.
- Should some properties be exempt from Visual Subordinance? We had a person interested in redeveloping a commercial property at the base of Corbett Hill Road. The property location and topography of the site coupled with the development regulations make it unlikely this property will ever redevelop.

We thank you for reaching out to us and working on our behalf to revisit the vision articulated within the plan. We do not have a position on any of the items described above, rather we know that these are topics that have been brought to our attention by our constituents. We believe these topics warrant discussion during the current review. We look forward to engaging in the process and working with you in your endeavor.

Respectfully,



Michael Cerbone, AICP
Land Use Planning Director
Multnomah County



Oregon

Kate Brown, Governor

Department of Forestry

Central Oregon District

The Dalles Unit

3701 West 13th

The Dalles, OR 97058

PHONE: 541-296-4626

FAX: 541-298-4993

www.ODFcentraloregon.com

March 7, 2017



"STEWARDSHIP IN FORESTRY"

Columbia River Gorge Commission
57 NE Wauna Avenue
P.O. Box 370
White Salmon, WA 98672
E-Mail: planreview@gorgecommission.org

Re: Columbia River Gorge Commission Management Plan Review

To Whom it May Concern,

The Columbia River Gorge Scenic Area encompasses a number of land uses, currently identified under a variety of land use designations. It is recognized that the purpose of the Columbia River Gorge National Scenic Area Act is to protect and enhance the natural, cultural, scenic, and recreation resources of the NSA, and to protect and support the economy of the Columbia River Gorge Area.

To that extent, the Oregon Department of Forestry (ODF) would like to address several items that directly relate to the purpose of the CRGNSA Act.

First, specific to forestry practices and timber management, it is noted under Chapter 2 (Forest Land) of the Management Plan Scenic Area Act Provisions (p. II-2-1), *'The Act defines forest lands to be those lands "used or suitable for the production of forest products"'*. Further, under Key Issues (p. II-2-1), the act states that *'Because public agencies, primarily those dealing with federal lands, are decreasing the acreage of land available for harvest, it is increasingly important that private industrial and non-industrial forest lands are managed and protected for the production of forest products.'* In addition, to minimize the conversion of forest lands, the Forest Land chapter also states, *'Land divisions in forest lands need to ...provide the opportunity for continuous growing and harvesting in an economically efficient manner.'*

As it currently stands, landowners who intend to manage the timber resource on their property must file a Notification of Operation and a Permit to Operate Power Driven Machinery with the Oregon Department of Forestry. By doing so, ODF is able to assess the proposed activity to ensure compliance with the Oregon Forest Practice Act (FPA), ensuring resource protection measures are addressed prior to, during and post-harvest. In addition, ODF foresters conduct inspections on the mechanized equipment to ensure it meets Industrial Fire Requirements, reducing the risk of fire starts from machinery.

From a forest health and economics standpoint, ODF has a vested interest in supporting forest management on private and non-federal public forestlands. Increased vegetation competition and recent drought have contributed to outbreaks of insect and disease in the Columbia River Gorge. Managing

these stands will provide for healthier forests today and into the future. An added benefit to reducing vegetative competition and opening up the spacing between trees for forest health is that it also reduces fuel loading that can contribute to high intensity, catastrophic wildfires which are extremely difficult to suppress and manage and which damages natural resources and the key species dependent on them. Another benefit from the removal of timber for forest health and wildfire hazard mitigation is the income brought in to the local economy from the essential production of forest products.

In addition to administering the Oregon Forest Practices Act, the Oregon Department of Forestry is responsible for the suppression of wildland fire on private and non-federal public lands. It is well known that wildfires can move through the gorge very quickly, often being wind driven, burning hundreds or thousands of acres which leave a lasting mark on the landscape.

ODF has several practices in place with the objective of minimizing or mitigating the start or spread of fire. We work cooperatively with our partner agencies to promote fire prevention through public education and awareness; ODF (and local fire districts) issue burn permits to ensure debris and slash burning is conducted safely; we conduct Industrial Fire Inspections on mechanized equipment during fire season; and we staff, train and assist our partner agencies in the suppression response on wildland fires.

Further, ODF applies for and manages grant funds that are used to help private landowners offset the cost of conducting fuels hazard removal and thinning work on their property. These funds have been very successful at treating over 5000 acres since 2005 across Hood River and Wasco counties, by reducing the concentration of vegetation on private lands, as well as around home sites (creating defensible space). This program not only reduces the intensity of wildfires that may move through these areas, it also improves the health of the residual timber stand.

Retention of healthy forested landscapes is also a benefit for local fish and wildlife species. Wildlife populations move around and utilize niche environments (i.e. Oak woodland habitat), depending on the wildlife species. Burned landscapes deplete essential foraging, bedding and nesting habitat. They also increase sediment runoff into waterways and reduce stream shading.

The Oregon Department of Forestry recommends that the NSA Act allow for the management of timber resources on private and non-federal public lands (regardless of land designation) to ensure:

- Forest landowners are allowed to harvest their timber for forest health reasons. This includes harvesting healthy trees to prevent outbreaks of insect or disease.
- Forest landowners are allowed to thin trees and reduce understory vegetation to reduce the fuel loading, thereby, minimizing the risk of catastrophic wildfire.
- Burned timber stands should be salvage harvested to allow for establishment of a new forest stand.
- Forest lands are managed to provide for the production of forest products, helping to support local economies.
- Forest lands are not penalized, thus subject to conversion of non-forest uses.

I appreciate your consideration of these comments. I would be happy to discuss these items further, should you have any questions.

Respectfully submitted,



Kristin Dodd

Unit Forester



Oregon

Kate Brown, Governor

Department of Forestry

Central Oregon District

The Dalles Unit

3701 West 13th

The Dalles, OR 97058

PHONE: 541-296-4626

FAX: 541-298-4993

www.ODFcentraloregon.com

March 6, 2017



"STEWARDSHIP IN FORESTRY"

Columbia River Gorge Commission
57 NE Wauna Avenue
P.O. Box 370
White Salmon, WA 98672
E-Mail: planreview@gorgecommission.org

Re: Columbia River Gorge Commission Management Plan Review

To Whom it May Concern,

The Columbia Gorge National Scenic Area has certainly experienced its share of wildland fires over the past several years. Wildfire can have a positive and cleansing effect on the landscape, however, the disaster sequence starts when a wild fire or multiple wildfires burn during extreme fire conditions. The combination of extreme vegetation, weather, and topographic conditions given a fire start produces fast-spreading, intensely burning fires that overwhelm wildfire suppression efforts. If extreme wildfire spreads close enough to residential development with its flames and firebrands, hundreds of ignitable homes can be simultaneously exposed.

Unfortunately, once a wildfire ignites, firefighters are limited in what they can do to protect the values in its path. The National Fire wise Communities Program is a national interagency program that encourages partnerships among communities, homeowners, private industry, tribes, and public agencies and officials to develop and implement local solutions for wildfire preparedness – before a fire starts.

Many rural areas lack proper Building, Fire or WUI Codes. A portion of the population feels that since they own the property they should be able to do what they please and suffer the consequences. A growing consensus even in rural areas, however, is that WUI codes may assist in the prevention and impact of wildfires. For example:

- A code that regulates the layout of a structure may help avoid heat traps.
- The establishment of a water supply on properties, which are more than a certain distance from a hydrant or existing natural water supply, can increase the value of the property.
- The requirement for a certain driveway width can allow access for more than fire

Department vehicles, as most companies have large vehicles for delivery purposes.

- The establishment of defensible space around structures and improvements that will reduce the potential for damage to property and the environment.

Because of damage from many recent wildfires, the need was identified to adopt statewide Building, Fire and WUI codes. Adopting specific WUI codes for builders and property owners to follow would provide reassurance to homebuyers that their home is safe from many of the natural hazards that exist and to the Gorge Commission that Scenic Area resources are better preserved and protected.

The Scenic Area Management Plan briefly addresses fire protection requirements within the forest land, however, these requirements were established several years ago and have become outdated. New research and data from recent wildfires has prompted the need to revise those standards that are no longer relevant to the ever changing wildland fire environment.

The wildland/urban interface (WUI) is a geographic location where structures and flammable vegetation merge in a wildfire-prone environment. Over the past century, America's population has nearly tripled, with much of the growth flowing into traditionally natural areas. This trend has created an extremely complex landscape that has come to be known as the wildland/urban interface.

Nearly 100,000 wildfires burn approximately 7 million acres of land each year. Most of the past century's wildfire activity has been seasonal in nature. However, recent years have proven otherwise and our nation now experiences fire activity in every month of the calendar year. Encroaching development into forests, grasslands, and farms has put lives, property, and natural resources at risk from wildfire.

As wildfires are growing in scale and duration, and increasing numbers of communities are affected, wildfires are now affecting economies and communities on a much larger scale. Wildland fire impacts are often described in terms of lives threatened, structures and homes lost or damaged, overall suppression costs, and damage to the natural resource base on which many rural communities rely.

Among the negative economic effects for communities, wildfires can burn timber, make recreation and tourism unappealing, and affect agricultural production. Local communities often become concerned about the effects of smoke on health and safety, as well.

Wildfires impact communities in multiple ways, from closing natural areas that residents and tourists visit to damaging homes and harming residents or firefighters. Short- and long-term impacts on recreational activity are quite possible and the closures of these areas often eliminate recreational activity. Many of the local businesses will experience impacts to facilities, shipping delays, and interruptions in employee productivity.

Depending on the severity and location of a wildfire, post-disaster recovery can come with a considerable price tag. Factors that affect state and local budgets in the long-term include: 1) replacement of lost facilities and associated infrastructure; 2) watershed and water quality mitigation; and 3) sensitive species and habitat restoration.

Post-catastrophe management of endangered species and their habitat is an issue as well.

Management requires extensive funding for watershed restoration and hazard mitigation efforts.

Portions of these funds are used to restore habitat and control the potential impact of erosion and floods in the following seasons. While not easily measured, loss of ecosystem services would be included in the total economic loss.

The best approach to wildfire preparedness involves utilizing the wide range of Fire wise standards and practices. The International Urban Interface Wildland Code (IUIWC) is a standard that regulates building materials that are used in the wildland/urban interface areas and provides for the enforcement of a set of standards for building inspectors (a problem that has been underscored after reviewing damages from wildland fires within recent years). This standard is reviewed and updated on a regular basis.

The National Firewise Communities Program offers a series of practical steps (landscaping, home construction and design, community planning, etc.) that individuals and communities can take to reduce their vulnerability to wildfire. Using at least one element recommended by the National Firewise Communities Program and adding other elements, such as the (IUIWC), over time will begin to protect against the risk of fire in the wildland/urban interface.

Examples of Firewise techniques for property owners include creating a defensible space around residential structures by thinning trees and brush; choosing fire-resistant plants; selecting ignition-resistant building materials; positioning structures away from slopes; and working with firefighters to develop emergency plans.

After the catastrophic fire season of 1985, representatives of NFPA and the USDA Forest Service met to discuss the increasing trend of wind-driven fire in populated areas, and formed what is now the National Wildland/Urban Interface Fire Program. In 1992, the advisory group for the program adopted the term "Firewise" to describe the state of being knowledgeable and prepared for wildfire in residential or urban settings. In 1999 the advisory group became the Wildland/Urban Interface (WUI) Working Team of the National Wildfire Coordinating Group, which oversees the National Wildland/Urban Interface Fire Program and its Firewise Communities program. The Firewise Web site launched in 1996, and the national workshop series began in 1999. Today, the Firewise Communities team continues its mission of wildland/urban interface fire education through its Web site, workshop series, community recognition program, and information resources.

The Firewise Communities program is part of the National Wildland/Urban Interface Fire Program, which is directed and sponsored by the National Wildfire Coordinating Group's Wildland/Urban Interface Working Team (WUIWT), a consortium of wildland fire organizations and federal agencies responsible for wildland fire management in the United States. The WUIWT includes:

USDA Forest Service	National Association of State Fire Marshals
USDI Bureau of Indian Affairs	State Forestry Organizations
USDI Bureau of Land Management	National Emergency Management Association
USDI Fish & Wildlife Service	National Fire Protection Association
USDI National Park Service	
Federal Emergency Management Agency	
International Association of Fire Chiefs	

Based on the dynamics of the growing wildfire problem that we continue to face within the Columbia River Gorge, we are requesting that you consider the following recommendations for addressing the issues mentioned above:

1. We recommend that the Gorge Commission adopt the National Wildland/Urban Interface Fire Program to include the Firewise Communities Program into the Columbia Gorge National Scenic Area Management Plan.
2. We recommend that the Gorge Commission adopt the International Wildland Urban Interface Building Code into the Columbia Gorge National Scenic Area Management Plan.
3. We recommend that the Gorge Commission adopt an exemption to the emergency response fire suppression procedures and provisions within the Columbia Gorge National Scenic Area Management Plan.

Wildfires are a natural process. It is our vision, based on the recommendations above, that with adequate planning and cooperation among varying interests, wildfires can occur without disastrous loss of life, property, resources and the environment. The National Firewise Communities Program provides a number of wildland/urban interface resources for firefighter safety, community planning, landscaping, construction, and maintenance to help protect people, property, and natural resources from wildland fire.

Additionally, the requirements established in the International Wildland Urban Interface Building Code can effectively reduce losses and damage from wildfires. We are proposing that the Gorge Commission take a proactive, community-based approach to our wildfire problem so we may better protect and preserve the lives, property and resources that are encompassed within the Columbia River Gorge Scenic Area. Your time and consideration in regards to this important issue is greatly appreciated. Thank you.

Respectfully submitted,

Kristin Dodd

Kristin Dodd
Unit Forester



Columbia Gorge Scenic Area Commission
57 Wauna Ave.
White Salmon, WA 98672

05-March-2017

Please consider the following comments from the Oregon Dept. of Fish and Wildlife (ODFW) in association with the Columbia Gorge National Scenic Area (CGNSA) Master Plan revision.

Several key developments as well as research knowledge associated with natural resources have taken place from inception of the current adopted Plan. Below are a few of these developments.

The currently adopted management plan identifies key fish and wildlife species and habitats with specific protections. From the time of the original plan, multiple stakeholders, including local, state and federal agencies, as well as non-governmental groups, created a guiding document which parallels the protections placed on the identified areas. The recently updated Oregon Conservation Strategy¹ (OCS) includes valuable information on fish, wildlife and habitats, which provides support for such protections. The OCS is an overarching voluntary state strategy for conserving fish and wildlife. ODFW recommends referencing the OCS in appropriate locations within the Plan.

Page 42. This proposed management plan acknowledges the value of Oak-Pine woodland. Within the OCS, this habitat type is identified as a key Strategy Habitat² with significant and unique biological values. Nearly all the Oak-Pine woodland serves as key wintering areas for deer and elk as well as turkey, woodpecker, bat, and gray squirrel habitat. Major threats to this habitat include habitat fragmentation from disturbance caused by increased residential development and increased public trail density. Other threats include land use conversion (e.g, vineyards, Christmas trees), as well as conifer encroachment and disease. Any loss of protection from these threats contribute to a net loss of habitat function and values, and potential for increased conflict between wildlife and residents. Best Management Practices (BMPs) should aim at reducing or eliminating conifer encroachment, such as Douglas-fir, but favoring Pine trees in structures shielding within Key Viewing Areas (KVA). Trail sitings should avoid these habitats to the greatest extent possible and co-locate trails within ¼ mile of prior disturbed areas such as I-84, Hwy 30 etc. The NSA should expect some degree of illegal trail construction as recreation interests increase in the Columbia Gorge and NSA. A plan to address and minimize potential for the illegal activity may be considered.

¹ <http://www.oregonconservationstrategy.org/>

² <http://www.oregonconservationstrategy.org/strategy-habitats/>

Page 43. A significant portion of the grasslands identified in the Scenic Area provide key wintering areas for deer and elk. Grasslands are also included as a Strategy Habitat in the OCS³. Neotropical migrants such as Horned Lark and Sage Sparrow are obligate to this habitat type and can suffer from fragmentation and catastrophic wildfire. ODFW recommends that BMP's should prioritize maintaining large intact blocks of habitat. Adjacent to the grasslands/shrub lands, the forest health is key to minimizing fire potential. Overstocking or diseased conifer trees, such as Pine trees, infested with bugs like the Ips and Pine bark beetle increase fuel loads making grasslands more susceptible to fire. Additionally, fire introduces noxious annual grasses such as Cheatgrass and Medusahead decreasing the habitat values.

Page 109. Section (2). ODFW supports these BMP's, with awareness that overcrowding of some vegetation, commonly Cattail within the NSA, can decrease habitat value in seasonal ponds crucial for Spotted Frog egg mass laying, rearing habitat for migratory waterfowl, and basking sites for Western Pond Turtles. This may be addressed on Rehabilitation and Enhancement Plan section of page 111.

Page 112. GMA Objective 1. ODFW supports this objective to update the wildlife inventories, as well as key wildlife areas and species. ODFW also supports promoting public programs that offer incentives to landowners who protect and enhance sensitive wildlife habitat.

Page 113/118. NSA fence standards are consistent with ODFW standards. ODFW has county Goal 5 winter range delineation as well as ODFW statewide winter range sites identified to assist in NSA management decisions.

Page 117. Section F. Noxious weed control and conifer encroachment (particularly Douglas fir) abatement are two common BMPs for habitat rehabilitation and enhancement within the NSA.

Page 138. Section F(3)(4). Oregon Administrative Rule 635-412-0005 provide language stating alterations of stream crossings or new stream crossings are legally required to provide criteria fish passage for native migratory fish where present. The plan language should reflect the current OAR.

Page 150. GMA Objective 2. Work with Oregon Parks and Recreation department (OPRD) on siting for campgrounds and trails. These objectives are identified within their recent management plan revision. ODFW recommends BMPs of siting these developments co-laterally with prior disturbed or developed areas and avoiding sensitive wildlife areas.

Page 155. ODFW recommends that trail densities have appropriate sideboards to minimize disturbance to wildlife and their associated habitats. Research from the USFS/ODFW Starkey experimental station suggests a maximum of 2 linear miles of trail every square mile. A plan to address illegal trails would be advantageous prior to these events.

Page 199. Chapter 2 Forest Land. This section identifies forest land as areas that are "used or suitable for the production of forest products". On page 206, it identifies Resource Enhancement

³ <http://www.oregonconservationstrategy.org/strategy-habitat/grasslands/>

projects for the purpose of enhancing scenic, cultural, recreation and/or natural resources”. Research has shown conifers, particularly Douglas fir, have the ability to grow, although not as productively, in historic Oregon White Oak habitat. With modern fire suppression priorities, Oregon White Oak Habitats are being lost to conifer encroachment. To support the plans objectives in preserving and enhancing key wildlife areas, language identifying reclamation and enhancement of the habitat from conifer encroachment would be warranted. Furthermore, proper stewardship of conifer silviculture methods, increases available wintering ungulate (deer and elk) as well as turkey habitat. This increase in available habitat has shown to decrease the wildlife/residential conflicts within the Columbia Gorge. Additional benefits can be realized through decreased disease in the tree structures, and decreased fuels in responding to wildfire events which have shown to increase with recreational uses.

Page 225. Desired Forest Structure and Pattern. Maintain flexibility within the matrix to address disease and WUI fire abatement management practices. Larger openings within coniferous forests have shown to benefit key species dependent upon invertebrate production and pollinator species. Limitations on opening size have contribute to habitat fragmentation, utilization, and availability.

Page 350. Recreation Development Plan. This chapter would be an appropriate location for comments stated above (page 150/155).

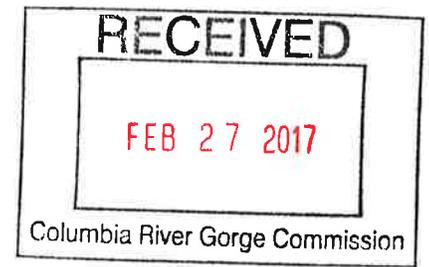
Thank you for the opportunity to provide comment on development of the CGNSA Master Plan revision.

If you have any question or would like clarification on any of the above stated comments, please feel free to contact me at the contact information provided below.

Respectfully,

A handwritten signature in black ink, appearing to read "Mike Moore".

Mike Moore
Assistant District Wildlife Biologist
Mid-Columbia District
3701 West 13th St.
The Dalles, OR 97058
(541) 296-4628 ext 326
Michael.moore@state.or.us



Representative Mark Johnson
OR House District 52
(503) 986-1452

Representative John Huffman
OR House District 59
(503) 986-1459

Senator Chuck Thomsen
Senate District 26
(503) 986-172

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

February 22, 2017

To Executive Director Wolniakowski and the Columbia River Gorge Commission:

Thank you for providing an opportunity for the public to comment on Gorge 2020, the update to the Gorge Commission Management Plan. We want to take this opportunity to share our concerns about the affordable housing shortage in the Gorge. We feel it is vitally important to share these concerns with you because our communities in the Gorge are struggling. The housing shortage and rising housing prices are changing the composition of our communities, pushing out average working people and increasing exclusivity.

We constantly hear from constituents affected by this problem. Employers, including Insitu and Hood River County School District, struggle to attract employees because working Oregonians can't afford increasing housing and rental prices. In Hood River, four teachers began the school year living in vans because they couldn't find affordable housing. And this shortage has ripple effects, putting strain on the housing supply and the social fabric of neighboring areas like The Dalles.

To alleviate the growing housing crisis, we would like to work with you to articulate a clear definition of minor or major amendments to the Management Plan which may allow cities within the National Scenic Area to expand our urban growth boundaries. The urban growth boundary was meant to provide for 20 years' worth of growth, but the boundary hasn't expanded since the founding of the Gorge Commission in 1986, over 30 years ago. The time to plan for the next 20 years of growth is long overdue.

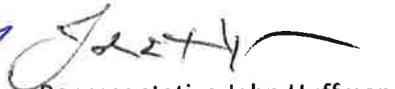
We have advocated in the legislature on behalf of the Gorge Commission for many years, and we want to continue to be your advocates. Now we need your support. The residents and local businesses of the Columbia River Gorge need a solution to this housing crisis: a process and a timeline for the expansion of the urban growth boundary. This process and timeline should be part of the updated Gorge Commission Management Plan.

The Gorge Commission has and continues to admirably fulfill its first goal: protecting and enhancing the scenic and natural resources of the Columbia River Gorge. We ask that as you plan for the future, you work to fulfill your second goal: protecting and supporting the Gorge economy.

Sincerely,



Representative Mark Johnson



Representative John Huffman



Senator Chuck Thomsen

cc: John Roberts, Director of Community Development, Hood River County
Cindy Walbridge, Planning Director, City of Hood River
Joel Madsen, Executive Director, Mid-Columbia Housing Authority

7 March 2017

National Scenic Area
attn: Krystyna Wolniakowski
PO Box 730
White Salmon, WA 98672

RE: 2020 Management Plan Update Comments

Dear Krystyna:

The Port of The Dalles respectfully submits these comments for the record with regard to Scenic Area Management Plan update:

1. **The management plan needs to be a living document that can adequately address unforeseen changes that could occur in the next 20 years.** Examples are:
 - The flourishing value added ag-businesses that have expanded beyond just wineries
 - Solar panels that are now constructed with non-reflective surfaces
 - Cell towers that did not exist in 1986
 - Self-driving cars that are heading our way
 - Other renewable energy sources
 - Allow a variety of home-based businesses
 - Define “commercial event” (Chapter 2, section 7.F)
 - Reliable and efficient transportation is a vital part of the Gorge's economy, as well as Oregon's economy, this includes river transport, rail, air, and highway. All transportation modes need to be supported and allowed to expand to meet their growing needs.
2. **Tourism can not be the only economic development industry supported in the National Scenic Area.**
 - The cost of the increased tourism in the Gorge is greatly taxing the EMS of the communities in the Gorge and at times putting the citizens of the communities at risk.
 - Small, home based businesses within the Scenic Area could be a valuable part of our economy, but these businesses need to be able to hire employees outside of the residence.
3. **Regional plans need to be integrated into the NSA Management Plan.**
 - MCEDD, Counties, Cities and Ports all have strategic plans. It is critical the the NSA read and understand what the mission is of each of these entities, incorporate by reference the individual plans and ensure alignment between the goals and objectives of these groups in the NSA with the management plan.
 - WADOT and ODOT plans also need to be incorporated so they can continue to provide reliable and safe transportation in this region in a coordinated way.

4. Urban Area Boundary Expansion.

- Define what a “minor” expansion actually is, do it quickly, realize you will be sued. Thinking about it for another 30 years does no one any good, and no matter what is proposed, a suit will happen.

5. If there is no visual impact, have some flexibility to address unique situations.

- In The Dalles there is very limited industrial land available for new business. Munsen Paving’s temporary batch plant is situated on about 8 acres of ready-to-build, industrially zoned land in the Port area. The business would like to move into their rock quarry located off Hwy 30 in The Dalles. There would be no visual impact/change since the plant would be in the pit below the bluff, there would be reduced truck traffic on Hwy 30, and moving would open up needed industrial land in the Port area. The historic issue has been that even though there are many benefits for this move, the NSA does not allow new batch plants in the NSA. This facility is very important to this region, and the Port will continue to support them where they are, but moving to their rock quarry would be a win-win on many levels.

6. Change the restrictions on building size and building site.

- Property owners need to have more flexibility on what and where they can build. Topography, septic location, sun, wind, can all limit a site’s potential house location options. Again, if the standard is no noticeable visual impact, give the architects and property owners some flexibility on building size, location and design.

7. Consistency of interpretation of the NSA management plan

Thank you for picking up this project, it’s been long over due.

Sincerely,



Andrea Klaas



SKAMANIA COUNTY

April 4, 2017

Columbia River Gorge Commission
Attn. Krystyna Wolniakowski
P.O. Box 730
White Salmon, WA 98672

RE: 2020 Management Plan Update Comments

Dear Krystyna,

Thank you for reaching out to Skamania EDC regarding comments pertaining to the 2020 Management Plan update.

On March 15, Skamania County, the City of Stevenson, the Port of Skamania, MCEDD, and the EDC met and brainstormed on language to include in the updates particularly relating to the economic development component of the act. In addition, we also discussed specific elements within the current Management Plan that should be updated or modified based on practical issues that have surfaced since the last Management Plan review occurred.

Economic Development Comments:

1. **Bi-State Vitality Plan and Regional Economic Development Plans – The Management Plan currently references the Bi-State Vitality Plan (refers to it as the Washington and Oregon economic development plans) in Policies 1-3 of Chapter 2, but there is no reference to any regional or local economic development plans.**
 - a. **Update to reflect current and complete economic development plan information on both the local and regional levels.**
 - b. **Incorporation of these documents (or references thereto) allows the Management Plan to be fluid in its ability to align with regional economic development efforts (living document).**
 - c. **Actively engage as part of these regional and local economic development efforts and increase awareness at the federal and state levels of the economic development component of the Act.**

- d. Utilize existing regional partners and their efforts to further the economic development goals of the Act.
2. Promote and advocate economic development projects within the Urban Areas and, if applicable, within the NSA boundaries.
3. Economic Development Priority Projects – The Regional Comprehensive Economic Development Strategy (CEDS) prioritizes economic development projects on a regional basis every year.
 - a. Language within the Management Plan should allow a mechanism for a third track review process for those projects to allow them to be completed on a “fast-track” basis.
 - b. The Gorge Commission should pay particularly attention to transportation projects/issues throughout the region and recognize the ongoing impact that congestion has on the regional economy and actively support funding and planning efforts to improve transportation as well as expedited review as mentioned in 3(a).
4. Scenic Area Funds for WIB and OIB – The Gorge Commission should be a strong advocate for the ongoing appropriations request for the remaining economic development funds of \$1,996,500 as this funding mechanism has the potential for a huge impact on economic development efforts within our communities.
5. Increase Awareness within the Gorge Commission of the ongoing economic development strategies:
 - a. Address inconsistencies within current Management Plan provisions that impacts economic development (see below Land Use Comments).
 - b. Create a sub-committee within the Gorge Commission that focuses on review of economic development priorities/issues within the region.
6. Recreation/Tourism – This industry sector should not be specifically identified in the economic development section of the Management Plan unless all industry sectors are specifically identified. Specific support for recreation from the Gorge Commission is not appropriate, but overall industry sector support should be identified based on regional planning efforts.
7. Public Infrastructure – Identify a mechanism to allow infrastructure expansion outside Urban growth boundaries when necessary.
8. Buildable Lands Inventory – Increase local capacity to plan for commercial and industrial growth by encouraging buildable lands inventories. Gorge Commission involvement could:
 - a. Require a buildable lands inventory to identify potential capacity issues (full build out) as part of the Urban Area revision process,
 - b. Identify best practices and/or standard protocols for development of buildable lands inventories,
 - c. Provide technical assistance to local governments conducting inventories.

Land Use Comments:

1. Existing Buildings – Management Plan should allow some flexibility in allowing new commercial uses to occupy a building when a prior commercial use has been discontinued. This is particularly important where the commercial use is nonconforming. For example, – a building previously used as a county road shop could only be used by a tenant who might store and maintain equipment for road maintenance or a similar use, but it could not be converted into a brewery or art studio. This should also apply to other non-residential structures, like granges.

2. Urban Growth Boundary – The Management Plan specifically identifies minor and major modifications, but does not currently define the difference. Once defined the minor modifications should be expedited.
3. Regional Transportation Issues – The Gorge Commission should work with existing regional agencies to understand, identify, and help address regional transportation issues. Transportation projects that address identified transportation congestion/issues should have a mechanism for expedited or modified development review.
4. Urban Area – several comment items:
 - a. Jurisdictional Confusion - The current Revised Code of Washington sections 35.21.160 and 35A.21.090 discuss city jurisdiction over adjacent first class shorelands and waterbodies. However, the Gorge Commission’s maps and Management Plan identify water areas like the Columbia River as General Management Area over which the counties have regulatory control.
 - i. Clarify jurisdictional authority between the statute and the Management Plan. Ensure Urban Area boundary amendment policies prioritize expansion of UAs within the statutory jurisdiction of cities.
 - b. Knowledge Gap - Currently, the Census Bureau acknowledges Oregon’s Urban Growth Boundaries, collecting and reporting information on demographic and economic activities within them as well as within city limits. The Census Bureau also does this for the Washington cities required to have Urban Growth Areas. Because Bingen, North Bonneville, Stevenson, and White Salmon are not required to have UGAs, we cannot identify trends for demographic and economic changes within vs. outside of our Urban Areas. This knowledge gap hinders grant applications for infrastructure projects and prevents accurate monitoring of economic development efforts.
 - i. Work with the Washington Office of Financial Management and the Census Bureau to identify NSA Urban Areas and facilitate better monitoring of economic development.
 - c. Legal description/rights-of-way - The recent definition of precise Urban Area boundaries relies on the centerline of road rights-of-way, despite the jurisdictional confusion this creates. Costs increase and project delays occur for the installation and maintenance of transportation and utility services. At best this increases the cost of doing business (or living) in UAs. At worst it prevents development of otherwise useable UA land.
 - i. Develop an expedited UA boundary expansion policy to allow inclusion of entire road right-of-ways within UAs. The following language was suggested in 2014: Any future Urban Area revision policy should include a statement regarding the importance of roadway corridors to the second purpose of the Act and provide that any proposed revision which moves an Urban Area boundary from a road centerline to the Scenic Area edge of a road ROW may cite the provision of transportation and utility service as prima facie evidence of compliance with the findings in Section 4(f)(2) of the Act.
 - d. Urban Area Legal Description/City Limits- Similarly, the legal descriptions exclude portions of city limits. Refer to the above descriptions of jurisdictional confusion and transportation and utility.

- i. Develop an expedited UA boundary expansion policy to allow inclusion of any city limits that existed prior to passage of the NSA.
5. Value Added Agriculture and accompanying commercial uses – Broaden the language in the Management Plan beyond just wineries and allow for commercial uses related to those agricultural activities. This has particular impact to several wineries on Underwood Mountain.
6. Cluster Development – Current provisions in the Management Plan have not been used as every application requires excessive information and ends up being appealed. The language either needs to be modified to allow it to be a relevant provision in the Management Plan or remove it entirely.

We appreciate the opportunity to comment on the Management Plan 2020 updates.

Please let us know if you have specific questions regarding our comments.

Sincerely,

A handwritten signature in black ink that reads "Kari R Fageress". The signature is written in a cursive style with a long, sweeping underline.

Kari Fageress

Cc: Pat Albaugh, Port of Skamania
Alan Peters, Skamania County
Ben Shumaker, City of Stevenson
Amanda Hoey, MCEDD



SOUTH SHERMAN FIRE & RESCUE

109 SW 2nd ST. P.O. Box 116
Grass Valley, Oregon 97029
Phone: (541) 333-2525
Fax: (541) 333-0821
info@southshermanfire.com

"We have the hottest job in town"

March 7, 2017

Columbia River Gorge Commission
57 NE Wauna Avenue
P.O. Box 370
White Salmon, WA 98672
E-Mail: planreview@gorgecommission.org

Re: Columbia River Gorge Commission Management Plan Review

To Whom it May Concern,

The Columbia Gorge National Scenic Area has certainly experienced its share of wildland fires over the past several years. Wildfire can have a positive and cleansing effect on the landscape, however, the disaster sequence starts when a wildfire or multiple wildfires burn during extreme fire conditions. The combination of extreme vegetation, weather, and topographic conditions given a fire start produces fast-spreading, intensely burning fires that overwhelm wildfire suppression efforts. If extreme wildfire spreads close enough to residential development with its flames and firebrands, hundreds of ignitable homes can be simultaneously exposed.

Unfortunately, once a wildfire ignites, firefighters are limited in what they can do to protect the values in its path. The National Fire wise Communities Program is a national interagency program that encourages partnerships among communities, homeowners, private industry, tribes, and public agencies and officials to develop and implement local solutions for wildfire preparedness – before a fire starts.

Many rural areas lack proper Building, Fire or WUI Codes. A portion of the population feels that since they own the property they should be able to do what they please and suffer the consequences. A growing consensus even in rural areas, however, is that WUI codes may assist in the prevention and impact of wildfires. For example:

- A code that regulates the layout of a structure may help avoid heat traps.
- The establishment of a water supply on properties, which are more than a certain distance from a hydrant or existing natural water supply, can increase the value of the property.
- The requirement for a certain driveway width can allow access for more than fire Department vehicles, as most companies have large vehicles for delivery purposes.
- The establishment of defensible space around structures and improvements that will reduce the potential for damage to property and the environment.

Because of damage from many recent wildfires, the need was identified to adopt statewide Building, Fire and WUI codes. Adopting specific WUI codes for builders and property owners to follow would provide reassurance to homebuyers that their home is safe from many of the natural hazards that exist and to the Gorge Commission that Scenic Area resources are better preserved and protected.

The Scenic Area Management Plan briefly addresses fire protection requirements within the forest land, however, these requirements were established several years ago and have become outdated. New research and data from recent wildfires has prompted the need to revise those standards that are no longer relevant to the ever changing wildland fire environment.

The wildland/urban interface (WUI) is a geographic location where structures and flammable vegetation merge in a wildfire-prone environment. Over the past century, America's population has nearly tripled, with much of the growth flowing into traditionally natural areas. This trend has created an extremely complex landscape that has come to be known as the wildland/urban interface.

Nearly 100,000 wildfires burn approximately 7 million acres of land each year. Most of the past century's wildfire activity has been seasonal in nature. However, recent years have proven otherwise and our nation now experiences fire activity in every month of the calendar year. Encroaching development into forests, grasslands, and farms has put lives, property, and natural resources at risk from wildfire.

As wildfires are growing in scale and duration, and increasing numbers of communities are affected, wildfires are now affecting economies and communities on a much large scale. Wildland fire impacts are often described in terms of lives threatened, structures and homes lost or damaged, overall suppression costs, and damage to the natural resource base on which many rural communities rely.

Among the negative economic effects for communities, wildfires can burn timber, make recreation and tourism unappealing, and affect agricultural production. Local communities often become concerned about the effects of smoke on health and safety, as well.

Wildfires impact communities in multiple ways, from closing natural areas that residents and tourists visit to damaging homes and harming residents or firefighters. Short- and long-term impacts on recreational activity are quite possible and the closures of these areas often eliminate

recreational activity. Many of the local businesses will experience impacts to facilities, shipping delays, and interruptions in employee productivity.

Depending on the severity and location of a wildfire, post-disaster recovery can come with a considerable price tag. Factors that affect state and local budgets in the long-term include: 1) replacement of lost facilities and associated infrastructure; 2) watershed and water quality mitigation; and 3) sensitive species and habitat restoration.

Post-catastrophe management of endangered species and their habitat is an issue as well. Management requires extensive funding for watershed restoration and hazard mitigation efforts. Portions of these funds are used to restore habitat and control the potential impact of erosion and floods in the following seasons. While not easily measured, loss of ecosystem services would be included in the total economic loss.

The best approach to wildfire preparedness involves utilizing the wide range of Fire wise standards and practices. The International Urban Interface Wildland Code (IUIWC) is a standard that regulates building materials that are used in the wildland/urban interface areas and provides for the enforcement of a set of standards for building inspectors (a problem that has been underscored after reviewing damages from wildland fires within recent years). This standard is reviewed and updated on a regular basis.

The National Fire wise Communities Program offers a series of practical steps (landscaping, home construction and design, community planning, etc.) that individuals and communities can take to reduce their vulnerability to wildfire. Using at least one element recommended by the National Firewise Communities Program and adding other elements, such as the (IUIWC), over time will begin to protect against the risk of fire in the wildland/urban interface.

Examples of Firewise techniques for property owners include creating a defensible space around residential structures by thinning trees and brush; choosing fire-resistant plants; selecting ignition-resistant building materials; positioning structures away from slopes; and working with firefighters to develop emergency plans.

After the catastrophic fire season of 1985, representatives of NFPA and the USDA Forest Service met to discuss the increasing trend of wind-driven fire in populated areas, and formed what is now the National Wildland/Urban Interface Fire Program. In 1992, the advisory group for the program adopted the term "Firewise" to describe the state of being knowledgeable and prepared for wildfire in residential or urban settings. In 1999 the advisory group became the Wildland/Urban Interface (WUI) Working Team of the National Wildfire Coordinating Group, which oversees the National Wildland/Urban Interface Fire Program and its Firewise Communities program. The Firewise Web site launched in 1996, and the national workshop series began in 1999. Today, the Firewise Communities team continues its mission of wildland/urban interface fire education through its Web site, workshop series, community recognition program, and information resources.

The Firewise Communities program is part of the National Wildland/Urban Interface Fire Program, which is directed and sponsored by the National Wildfire Coordinating Group's Wildland/Urban Interface Working Team (WUIWT), a consortium of wildland fire organizations

and federal agencies responsible for wildland fire management in the United States. The WUIWT includes:

- USDA Forest Service
- USDI Bureau of Indian Affairs
- USDI Bureau of Land Management
- USDI Fish & Wildlife Service
- USDI National Park Service
- Federal Emergency Management Agency
- International Association of Fire Chiefs
- National Association of State Fire Marshals
- State Forestry Organizations
- National Emergency Management Association
- National Fire Protection Association

Based on the dynamics of the growing wildfire problem that we continue to face within the Columbia River Gorge, we are requesting that you consider the following recommendations for addressing the issues mentioned above:

1. We recommend that the Gorge Commission adopt the National Wildland/Urban Interface Fire Program to include the Firewise Communities Program into the Columbia Gorge National Scenic Area Management Plan.
2. We recommend that the Gorge Commission adopt the International Wildland Urban Interface Building Code into the Columbia Gorge National Scenic Area Management Plan.
3. We recommend that the Gorge Commission adopt an exemption to the emergency response fire suppression procedures and provisions within the Columbia Gorge National Scenic Area Management Plan.

Wildfires are a natural process. It is our vision, based on the recommendations above, that with adequate planning and cooperation among varying interests, wildfires can occur without disastrous loss of life, property, resources and the environment. The National Firewise Communities Program provides a number of wildland/urban interface resources for firefighter safety, community planning, landscaping, construction, and maintenance to help protect people, property, and natural resources from wildland fire.

Additionally, the requirements established in the International Wildland Urban Interface Building Code can effectively reduce losses and damage from wildfires. We are proposing that the Gorge Commission take a proactive, community-based approach to our wildfire problem so we may better protect and preserve the lives, property and resources that are encompassed within the Columbia River Gorge Scenic Area. Your time and consideration in regards to this important issue is greatly appreciated. Thank you.

Respectfully submitted,

Glenn R. Fluhr
Sherman County Defense Board Chief,
South Sherman Fire & Rescue 0 Chief



CITY of THE DALLES

313 COURT STREET
THE DALLES, OREGON 97058

(541) 296-5481
FAX (541) 296-6906

March 13, 2017

Gorge Commission
P.O. Box 730
White Salmon, WA 98672

Honorable Chair and Members of the Commission,

The City appreciates the opportunity to comment on the Gorge 2020 Management Plan Review. As the largest community located within the boundaries of the National Scenic Area, The Dalles values its partnership role with the Commission and other stakeholders in the stewardship of the Gorge's resources. The City supports the efforts of the Gorge Commission and staff in the update to the Columbia River Gorge National Scenic Area Management Plan.

The Dalles is the population and employment center for the Mid-Columbia area, and as such the community's actions on housing and economic development have regional implications. In this regard the City Council strongly encourages the Commission to address the issue of urban area boundary adjustments as a component of the Management Plan Review. The Commission should not only identify and establish a process to consider adjustment requests; the City also respectfully requests that the Commission adopt definitions and processes for both minor and major amendments.

Without a process in place to consider urban area amendment requests, the City's continuing ability to attract job creating businesses and needed housing opportunities could be compromised. This is a critical issue not only for The Dalles, but also for other communities located throughout the NSA.

Additional comments will be forthcoming as the Plan update continues through the public process.

Respectfully submitted,

Stephen Lawrence, Mayor
City of The Dalles



PLANNING DEPARTMENT

2705 East Second Street • The Dalles, OR 97058
p: [541] 506-2560 • f: [541] 506-2561 • www.co.wasco.or.us

Pioneering pathways to prosperity.

March 8, 2017

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

Krystyna Wolniakowski, Executive Director
Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98672

(Also provided by email to krystyna.wolniakowski@gorgecommission.org and bowen.blair@gorgecommission.org)

Subject: Comments for the Gorge 2020 Management Plan Review and Update Process

Greetings Columbia River Gorge Commissioners and Staff,

Thank you for the opportunity to provide formal comments on the Gorge 2020 Management Plan review and update process. To date, Wasco County staff has attended two of the three Gorge 2020 listening sessions, provided feedback at the February 2017 Gorge Commission meeting, and has now met with Gorge Commission staff to discuss several of the comments listed below.

The Columbia River Gorge is world renowned for being a beautiful place to live, work, and play. Its scenic landscapes, public recreation opportunities, abundant natural and cultural resources, working farms, and diverse collection of communities are worthy of our efforts to protect and enhance for current residents and visitors as well as future generations. Wasco County feels strongly that this must be done in a manner that allows our residents a successful existence and every opportunity to prosper - while ensuring the landscape is sustainably managed to endure the influx of visitors.

An update to the Management Plan is welcome and much needed. We applaud your efforts to get this underway. As you know, we have voiced concerns regarding the need for additional community outreach to ensure the process is well informed by those most affected. That said we remain committed to assist the Gorge Commission in their efforts to achieve timeline goals and a successful update. Examples of our efforts to assist and collect local feedback include sending our staff to meet with yours on several occasions to discuss process suggestions and regional and historical context; outreach to our affected urban area leadership, economic development agency, port districts, transportation partners, fire departments and forestry/fire agencies; and a recently mailed public notice to all affected landowners in Wasco County pointing them to Gorge Commission resources and staff for additional information. We will be hosting a public meeting on April 11, 2017 that will include a brief overview of

Gorge 2020 and how to get involved. We will collect and share any additional feedback received at this meeting.

This comprehensive update effort is a rare opportunity to evaluate the successes and short comings of the current plan, including its impacts to our residents. We have categorized our comments below into policy level needs, formatting suggestions and specific changes to existing rules for your consideration.

Policy Level Needs:

- Incorporate the local vision with the national vision, based on feedback from each community.
- Clarify roles and responsibilities, and empower partner agencies and organizations that have specifically developed plans to achieve goals supported by the National Scenic Area Act. Examples include: MCEDD, ODOT, WSDOT, ODF, WA DNR, and other local public entities determined to be appropriate (please take the time to identify and understand those plans).
- Provide policy direction necessary to guide the urban area expansion process (define “minor”).
- Revise the treaty rights consultation process to ensure local governments are not in a position of liability and to ensure the consultation process is occurring as effectively as possible.
- Provide implementation guidance and technical assistance to ensure consistency and continuity of regulatory implementation from staff to staff.
- In coordination with each community, prepare a buildable lands survey that addresses the supply of land available for housing, commercial and industrial uses in each community.
- Evaluate current zoning and make changes where appropriate based on land use trends and available resources.
- Address trends in recreation and agriculture related tourism and identify how it will be balanced to ensure a sustainable economic impact, sensitive to natural and cultural resources, and will not negatively impact the livability of our residential communities.
 - Address community costs of recreation and agri-tourism, as well as the benefits, to provide a holistic source of information that can be used to set policy.
 - Overcrowding and overuse of natural sites, unmanaged uses, traffic congestion and parking issues, impacts of transit, treaty rights conflicts, degradation of resources, etc.
 - Address the impacts of recreation and tourism on emergency service providers. In some cases, demands on our local EMS services have exceeded local resource capacity. EMS services are assumed to be sufficient without coordination. We are unable to ensure a safe experience on our landscapes. These increases in demand also remove services from our local communities to serve visitors.
 - Need to assess the quality of protected resources that are being “loved to death”, and either (1) rezone and remap to allow resource managers to meet current vision and resource protection requirements or (2) mitigate to meet current rules.
- Address community needs that in some cases may only be met outside of urban areas.
- Address the demand for short term rentals and accessory dwelling units in the Gorge.
- Address regional energy planning issues and needs.
- Address climate change through reference to each county’s natural hazard mitigation plan already prepared to comply with FEMA requirements.
- Identify emerging issues that will affect our residents, visitors, emergency services, industries and agriculture operators over the next twenty years.

Formatting Suggestions:

- Pull out and reference implementation strategies to allow for more frequent updates.
- Insert a user's guide upfront to help readers use the document(s) more easily.
- Make the document is word searchable and linked for important cross-references.

Specific Changes:

- Set the expectation for each land use designation by referencing the landscape settings and identifying for the reader that most landscapes are protected as "working landscapes" not simply for "natural" appearances with limited development.
- Allow for a list of "Type 1" review uses (uses with no or low impact that qualify for an over-the-counter review and do not require public notice).
- Expand the economic development chapter to incorporate existing economic development plans to allow the Management Plan to act as a more living document and reflect changing economies in the Gorge. Add a transportation chapter to incorporate existing transportation plans, for the same reason.
- Expand winery uses to allow for similar development, including cideries, and clarify the intent for distilleries, farm stands, concerts, food sales, commercial "farm" dinners, weddings, winery hiking trails ("wiking"), bike tours and races that stop at these locations, and other events.
- Prepare a recreation master plan to identify the recreation "build-out" of the NSA. This will allow for the goals of the NSA Act to be met, provide certainty for communities who are relying on recreation development for tourism plans, set a threshold for resource impacts brought on by recreation, identify current and future management needs, and cap the number of properties taken out of private ownership (and off the local tax base) for recreation purposes.
- Clarify whether running, bicycle and other races and events occurring on private and public lands are commercial events that require review and resource impact analysis.
- Remove the scenic compatibility analysis as a means to determine the size of new development as it can unfairly impact new development occurring in landscapes that have no development or limited development.
- Exempt or refine resource protection language for critical infrastructure projects that must be in the immediate vicinity of protected resources.
- Allow roof mounted solar panels that are black with black frames, and not encased in glass, to be allowed without a Scenic Area permit.
- Provide mechanisms to allow agriculture labor housing clusters that meet a community need as opposed to being limited an individual farm's need.
- Exempt wildfire emergency responses from the requirements of the emergency response provisions or any other Scenic Area review process.
- Incorporate by reference and require new development to comply with the NFPA and Firewise Communities program (updates defensible space, water and access requirements, materials and landscaping requirements for wildfire prevention).
- Work with State and Federal forestry programs to allow for proactive forest health management on private and public lands to reduce fire risk and invasive species (e.g. beetle damage).
- Allow for ballfields and other community park amenities necessary for Gorge youth.
- Support local schools and fire departments with flexibility in rule language to add, replace and improve facilities to support the existing communities.
- Address long-term utility needs that need to be met outside of Urban Areas (e.g. communications towers, water towers and other collection facilities, waste water treatment for dense rural residential areas, etc.)

Wasco County Gorge 2020 Comments
March 8, 2017

- Allow for transfer of development rights to enable creative development that also protects resources.
- Add in ORS language that would allow for the legalization of illegal parcels that would have qualified at the time of creation (ORS 92.176)

Since the adoption of our local NSA Ordinance in 1994, we have reviewed hundreds of development requests. Our staff is well versed in Scenic Area rules, regulations and regional policies and is very familiar with the concerns of our affected residents. In order to be successful, the revised plan must work for our residents and must be possible to implement with existing resources. **We request that you strongly consider our comments, and continue to seek our feedback moving forward.**

Thanks again for allowing us the opportunity to provide formal comments. Please contact me directly with any questions or concerns.

Sincerely,



Angie Brewer, AICP
Planning Director

Cc: Tyler Stone, Wasco County Administrative Officer and the Wasco County Board of Commissioners

WASCO COUNTY ECONOMIC DEVELOPMENT COMMISSION

515 East Second Street The Dalles, OR 97058 ♦ 541-296-2266 ♦ www.co.wasco.or.us/county/wcedc

March 8, 2017

Columbia River Gorge Commission
Attn: Krystyna Wolniakowski
57 NE Wauna Avenue
White Salmon, WA 98672

RE: Gorge 2020 NSA Management Plan Update Comments

Dear Krystyna,

Please see the attached comments I am submitting on behalf of the Wasco County Economic Development Commission for consideration during the Gorge Commission's efforts to develop the scope of the Gorge 2020 National Scenic Area Management Plan Update. We welcome the opportunity to participate in this important process now and as the Gorge Commission moves through the course of this update.

Please feel free to reach out to us with any questions about the information submitted.

Thank you in advance for your engagement with the communities of the Gorge during this process so key to our continued community vitality.

Respectfully,

Carrie Pipinich
Coordinator
Wasco County Economic Development Commission

Gorge 2020 National Scenic Area Management Plan Update Wasco County Economic Development Commission Comments

Overview: Economic Development is one of the two primary purposes listed in the Columbia River Gorge National Scenic Act. As stated in the current management plan, “Congress intended the Scenic Area Act to support the economy of their communities in the Scenic Area. The second of the Act’s two stated purposes is to protect and support the economy of the Gorge by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with the protection of scenic, cultural, and natural resources [Section 3(2)].” The Management Plan is critical for the success of the communities in the Gorge as well as meeting the NSA’s key mandates.

Priority Issues and Requests for Wasco County Economic Development:

- **Local voices are too easily lost** to the sheer volume of voices from outside of the area—incorporating additional opportunities for input from local communities impacted by the NSA can ensure the Management Plan reflects issues key to their vitality.
 - **Incorporation of comments/concerns from local communities and planning entities.** The local planning departments implement the NSA requirements on a day-to-day basis—their input ensures the plan reflects their challenges in implementation and the needs of the communities they serve.
- **Economic Development Plan Utilization.** There are economic development planning documents that are developed through extensive local processes to reflect local economic development needs, issues, and opportunities. These include: MCEDD’s Regional Comprehensive Economic Development Strategy, the Bi-State Vitality Plan (Oregon and Washington Investment Boards), County focused plans, and Port District plans. Utilizing these documents that are updated regularly to guide economic development sections in the Scenic Area Management Plan would support strong partnership around meeting the Economic Development mandate in NSA Act.
- **Update principle economic development sectors.** Reflect regional targeted industry and growth sectors to address gaps in the plan that have developed over the last 30 years. These include other types of value added agricultural enterprises and related agritourism activities in addition to wineries. Coordination with local planning efforts in a more dynamic fashion could ensure that these changes can occur with shifting industry dynamics moving forward.
- **Ensure key infrastructure to support existing communities.** Many of the urban areas and existing communities in the NSA are working to ensure they have adequate infrastructure to support economic development within their bounds. Providing a process through which communities can meet key infrastructure needs by siting those facilities outside of urban growth boundaries, when necessary, will allow for economic development to continue to occur within the urban areas as mandated in the NSA Act.
 - This infrastructure should be broadly defined. Basic infrastructure like water, waste water, electric and broadband services are necessary conditions for community sustainability within urban areas and in dense rural residential areas. In addition, attainable housing as well as school and public safety facilities are needed to support not just economic development within urban areas but the continued appropriate utilization of recreation opportunities within the NSA.
- **Urban Area Boundary Adjustments.** Identify a process to analyze urban growth boundary modifications as well as defining major and minor adjustments so that there is a clear path for communities in their planning.
- **Treaty Rights Consultation.** Revise the treaty rights consultation process to ensure the local governments are not in a position of liability.
- **Tourism is important, but it is not the extent of economic development in the NSA.** Economic development partners in Wasco County have worked together since the collapse of the aluminum plant in the 1980s to grow and diversify the base of family wage jobs in this community. Tourism is an important component of that diversification, but the ability to support a variety of industries including manufacturing, value added agriculture, technology based companies, and many others is key to our community’s long term success.



West Side Fire Protection District

1185 Tucker Road - Hood River OR 97031
Office: 541.386.5551 Cell: 541.490.3324
Fax: 541.386.7228 wsfd502@gorge.net

March 8, 2017

Chris Nickelsen
Chief, West Side Rural Fire Protection District
1185 Tucker Road
Hood River, OR 97031

Columbia River Gorge Commission
1 Town and Country Way
57 NE Wauna Avenue
P.O. Box 370
White Salmon, WA 98672
E-Mail: planreview@gorgecommission.org

Re: Columbia River Gorge Commission Management Plan Review

To Whom it May Concern,

This letter is to urge you to allow building and landscaping practices within the Columbia River Gorge National Scenic Area consistent with modern fire prevention guidelines to reduce the risk of disaster from wildfire. The Firewise Communities Program, a national cooperative between the U.S. Department of the Interior, U.S. Forest Service, National Fire Protection Association, and local communities and governments dating back to the 1980s, has worked to reduce the risk of fire damage to over 1.5 million residents across 42 states through the use of modern fire science. I urge your organization to incorporate such practices into your Management Plan to reduce the risk of disaster from wildfire in the Columbia River Gorge National Scenic Area. A Fact Sheet about the Firewise Program is attached to this letter.

Disaster from wildfire is all too common, with an average of 3,875 structures destroyed annually by wildfire in 2011-2013, however, the impacts from wildfire can be greatly reduced through thoughtful building and fire codes. Wildfire disasters commonly occur through an unfortunate combination of fuels, weather, and topography and usually happen in the wildland/urban interface where structures and flammable vegetation merge. Most of the Columbia River Gorge National Scenic Area is in the wildland/urban interface zone, making this issue pertinent to your organization's Management Plan. Once these types of fire start, whether from human or natural causes such as lightning, they spread quickly through fuels such as vegetation and structures. It has become all too common to have such conditions result in fire spreading through residential developments destroying both homes and lives. The magnitude and fast-moving nature of such fires severely limits the effectiveness of firefighting efforts in reducing losses of life and

www.westsidfire.com

"Neighbor Helping Neighbor"

property, making prevention the best action to reduce the impacts.

Pro-actively reducing the risk of fire spread is the basic tenet of the Firewise Communities Program. Simple actions such as the use of non-flammable roofing materials and creating defensible spaces between structures and nearby vegetation greatly reduce the risk of disaster from wildfire, however, such actions must be allowed in building and fire codes. The International Urban Interface Wildland Code (IUIWC) is a standard that regulates building materials that are used in the wildland/urban interface areas and provides for the enforcement of a set of standards for building.

In closing, I urge your organization to take a proactive, community-based approach to the wildfire issue to help us better protect and preserve the lives, property and resources within the Columbia River Gorge National Scenic Area.

Respectfully submitted,

Chief Nickelsen



**Washington State
Department of Transportation**



**Oregon
Department
of Transportation**

March 2, 2016

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

RE: Management Plan Review Agency Comments

Chair Bowen and members of the Columbia River Gorge Commission,

The Oregon Department of Transportation and the Washington Department of Transportation are collectively presenting proposed revisions our two agencies would like to see addressed in the upcoming Columbia River Gorge National Scenic Area Management Plan Review for your consideration.

The Columbia River Gorge is a national treasure. The Columbia River Gorge National Scenic Area was established by Congress to protect and provide for the enhancement of the scenic, natural, cultural and recreational resources of the Columbia River Gorge. The Columbia River Gorge serves as a primary regional transportation artery, including two interstate freight routes and unparalleled scenic highway. The Oregon and Washington departments of transportation are encouraging the Commission to use the opportunity presented by plan review to enhance the safety and efficiency of the transportation systems through the Gorge.

We have prioritized some opportunities for clarification/revision within the management plan that would help our agencies maintain the safety and efficiency of the Gorge's transportation systems. We look forward to working with your staff to include this recommended revision as part of the Management Plan Review.

Recommended issues to be addressed in the upcoming plan revision process:

1. Disposal Sites (II-7-53 (2))

The Columbia River Gorge is a geologically dynamic place. Rocks fall, trees blow down, culverts overflow resulting in debris on our roadways. This debris requires immediate removal to maintain traffic flow. Our roads are life lines. They provide access to our communities, emergency responders and commerce. With over 28,000 average daily trips on Interstate 84 and 9,800 trips on SR 14, closures and delays have extreme impacts throughout the region.

There is an urgent need for new disposal sites in the Gorge close to where the material is being generated. Presently the Management Plan requires extensive planning requiring a reclamation plan and strict siting standards. These standards are appropriate to ensure that the scenic, cultural, recreational and natural

resources are protected. However, the Management Plan goes one step further by requiring that new disposal sites shall only be approved if the applicant demonstrates that it not practicable to locate the disposal site outside the NSA or inside an urban area. At a minimum, the applicants shall submit a feasibility and suitability analysis that compares the proposed disposal site to existing or potential disposal sites located both outside the Scenic Area and inside an Urban Areas. This requirement makes it challenging to site new disposal sites within the scenic area. Much of the activity requiring disposal is located within the SMA.

The Departments of Transportation are requesting that the Gorge Commission amend this language to say the following:

Existing Language

Siting Standard. The proposed disposal site shall only be approved if the applicant demonstrates it is not practicable to locate the disposal site outside the Scenic Area or inside an Urban Area. At a minimum, the applicant shall submit a feasibility study and suitability analysis that compares the proposed disposal site to existing or potential disposal sites located both outside and the Scenic Area and inside an Urban Area.

Proposed Language

Siting Standard. The proposed disposal site shall only be approved if the applicant demonstrates how to proposed site meets the need for disposal. At a minimum, the applicant shall describe the location, access and provide a use and development plan for the site. This analysis should include the size and location of the site in relation to surrounding land uses.

2. Geotechnical Investigations (II-7-21-1(P)5)

Presently the Management Plan requires geotechnical investigations within the disturbed roadway prism with the shoulder or ditch line to obtain a full NSA permit review. We are requesting that they be eligible under the expedited review process. Timing is critical during the design development phase.

Geo-technical investigations typically require test pits. Test pit depths are typically no more than 12 feet deep due to equipment constraints. The width of a test pit is limited to the width of an excavator bucket, typically less than 3 feet. Some raveling and caving of the test pit side slopes will likely occur which will increase the width of the pit. Upon completion of the analysis, the pit will be backfilled with excavated material and compacted using the excavator bucket. Bore holes will be complete using truck, track or skid mounted drill rigs. Bore holes are typically 5 inches in diameter. The holes will extend until they hit rock and their depth will depend on specific geotechnical need in the specific location. Subsurface geotechnical test pits, bore holes and the necessary access routes are temporary in nature and will not have long term visual impacts.

(II-7-21-1(P)5)Add Test pits, bore holes and temporary access

P. The following transportation facilities provide they are not part of larger construction or reconstruction projects (which will be reviewed as a whole).

(5) Test pits, bore holes and temporary access associated with geotechnical investigations located inside road, utility or railroad rights of way or easements that have been disturbed in the past provided (1) they are temporary in nature (2) and restored to their prior condition.

3. Barriers

The I-84 Corridor Strategy Team has developed a set of standards for new concrete barrier within the corridor. Presently new barrier within the National Scenic Area requires full NSA review while guardrail and guardrail ends do not. If the barrier complies with the Scenic Roadway Management Plan such as the I-84 Corridor Strategy Guidelines new barrier should be included as a use eligible for expedited review.

(II-7-21-1(P)(1) Barriers

P. The following transportation facilities provide they are not part of larger construction or reconstruction projects (which will be reviewed as a whole).

(1) New guardrail and guardrail ends, other than those allowed outright, new wire strand- and woven-wire access control fences and concrete barriers. ~~This category does not include jersey barriers.~~

4. Rock Fall Protection

Rock fall protection is a critical element of roadside safety and protective structures in the Gorge. Replacement of the existing rock fall protection should be allowed without review in the GMA (General Management Area) and SMA (Special Management Area) Open Space.

II-7-16 B. The following transportation facilities:

(1) Replace existing safety or protective structure, including guardrails, access control fences and gates, barriers, energy attenuators, safety cables, rock fall protection and traffic signals and controllers, provided the replacement structures (1).....

5. Cable Barrier

4-strand cable barrier is now required on some sections of Interstate 84 to improve motorist safety. These barriers are recommended to reduce the potential for road departure accidents resulting in serious injuries or fatalities to motorists. Recently, Oregon legislation was passed that mandated the installation of barriers in all sections of interstate with an open median less than 100 ft. wide to reduce the potential for cross over crashes. Replacement of existing safety barrier is allowed outright (II-7-16 (1)), however, new cable barrier is not called out in the Management Plan as a eligible expedited review use. As such, we are recommending that this added to list of expedited review uses.

(II-7-21-1(P)(1) PROPOSED LANGUAGE

P. The following transportation facilities provide they are not part of larger construction or reconstruction projects (which will be reviewed as a whole).

(1) New guardrail and guardrail ends, other than those allowed out right, and new wire-strand, woven wire access control fences and cable barriers.

6. Recreation Intensity Class

The Gorge Commission staff should revisit the recreational intensity class designations in relationship to transit services. Transit can provide a useful tool to help deal with congestion and illegal parking along the highways at the recreational destinations. However, the Management Plan's Recreational Intensity Classes are tied to the number of parking spaces and do not specifically address those accessing the site using transit. The Management Plan encourages transit use under recreation chapter but clarifying language would provide policy guidance and help the transportation agencies better manage parking and multi-modal access along our roadways.

Thank you for the opportunity to share some of issues we have encountered while maintaining our transportation systems through the Gorge. We look forward to working with your staff to ensure that we achieve the balance, protecting resources while maintaining access through the Columbia River Gorge National Scenic Area.

Sincerely,



Michael A. Williams, PE
Washington Department of Transportation
SW Region Planning Manager



Kelly Brooks
Oregon Department of Transportation
Region 1 Policy and Development Manager