



[Port of The Dalles Letterhead]

April 27, 2020

VIA EMAIL

Columbia River Gorge Commission
c/o connie.acker@gorgecommission.org

Re: Comments on Gorge 2020 Economic Development Chapter Revisions (April Version)

Dear Chair Liberty and Commissioners:

The Port of The Dalles (“Port”) provides these comments to the Columbia River Gorge Commission (“Commission”) to support further revisions to the current working draft of Part III, Chapter 2 Economic Development (“April Version”) to reiterate the importance of economic vitality to working communities in the National Scenic Area.

The Commission will be considering the Chapter 2 April Version on April 28, 2020. This latest version significantly undermines the importance of balancing the economic and quality of life in the Gorge. While the revised introduction to the Chapter 2 appears to support a balanced consideration of resource protection and economic vitality, the proposed revisions to the GMA policies raise serious concern about the intent and future interpretation of the GMA policies to limit future economic development opportunities, even in Urban Areas. Further, the April Version of Chapter 2 drastically departs from the proposed revisions presented for public comment in December (“December Version”), which on whole, presented a more balanced consideration of resource protections and economic vitality.

The Port provides the following overarching comments and encourages the Commission to revise Chapter 2 accordingly or otherwise place on the record is reasons for rejecting these important policies considerations.

- **The Gorge has been home to people for centuries.** The Port requests that the language “The Columbia River Gorge is home to 55,000 people” be added back into the Introduction.
- **The Gorge has other industries besides resource industries and tourism.** The Port requests that the economic sectors be revised and described as “agriculture, forestry, tourism, high tech, manufacturing and processing, and healthcare” to accurately reflect the industrial sectors in the urban areas.
- **The ports serve an important role in economic development.** GMA Policy 9 currently recognizes the role of ports in the National Scenic Area as a special economic development contributor. The April Version of Chapter 2 proposes to strike this policy in its entirety. As described throughout this plan amendment process, the ports play a role in economic development within urban areas, along the waterfront and elsewhere. Removing this language



significantly changes the intent and policy direction of Chapter 2 as it relates to port development and infrastructure, a major contributor in the Urban Areas.

- **Reliance on an Economic Vitality Plan for basis of management plan policies is concerning.** The Port previously raised concerns over the incorporation of the Economic Vitality Plan into the management plan and what appears staff's reliance on the Economic Vitality Plan to justify management plan policies.

In addition to the above, the Port provides a redline of its additional comments and suggested revisions for the Commission's consideration (Attachment 1, bold and italics note the Port's redline comments). The Port also encourages the Commission to reconsider language proposed in the December Version of Chapter 2 (Attachment 2).

Thank you for your consideration.

Andrea Klaas, Executive Director
Port of The Dalles

CHAPTER 2

Economic Development

~~The Columbia River Gorge is home to nearly 55,000 people. The Columbia River Gorge National Scenic Area spans 85 miles of the Columbia River and includes 292,500 acres of diverse landscapes and 13 urban communities. It is home to nearly 55,000 people.~~ Congress intended the National Scenic Area Act to support the ~~economy of their~~ economies of the communities in the National Scenic Area. ~~The second of the Act's two stated purposes~~ One 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 protection of scenic, cultural, recreation, and natural resources [Section 3(2)]."

~~The term "economic vitality" as used in this chapter, refers to a strong and diverse economy that contributes to increased prosperity, job opportunities, and an enhanced quality of life. As stated in the National Scenic Area Oregon and Washington Economic Vitality Plan (2016): "The purpose of the National Scenic Area Oregon and Washington Economic Vitality Plan is to set forth a vision and strategies for enhancing the economy and quality of life of Oregon and Washington communities located within the National Scenic Area".~~ The economic vitality of the National Scenic Area and the health of the scenic, natural, recreational, and cultural resources of the Columbia River Gorge are interdependent. The goals and policies in this chapter support the vision of a thriving economy supporting diverse business opportunities that operate in harmony with the National Scenic Area's ~~rural~~ qualities, values, and resources, especially with the ~~the~~ Gorge's ~~principal~~ economic sectors, such as agriculture, forestry, ~~and~~ tourism, *high tech, manufacturing and processing, and healthcare*, while allowing new commercial uses on lands designated Rural Center, Commercial, and Commercial Recreation. Climate change directly and indirectly affects many of the region's current economic sectors. Addressing climate change will improve the viability of those economies into the future. ~~In addition, the necessity of adapting to changing conditions and the interest in mitigating effects create new opportunities for a natural resource-based economy.~~

This chapter focuses on the General Management Area as the primary location for commercial development. The Special Management Areas (SMA) include the region's most sensitive lands and resources. In the Act, Congress explicitly limited new development in the SMA, and directed that commercial development take place outside of the SMA.

GMA PROVISIONS

GMA Goals

1. Protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing Urban Areas.
2. Protect and support the economy of the Columbia River Gorge area by allowing future economic development in a manner that is consistent with the protection and enhancement of the scenic, cultural, recreation, and natural resources of the Columbia River Gorge.

GMA Policies

1. The Gorge Commission shall consult with the States of Washington and Oregon in the States' updates to their coordinated Economic Vitality Plan developed pursuant to Section 11 of the National Scenic Area Act, ~~development and implementation of their state and regional economic development plans.~~ *[Port comment: return to original language]*
2. The Gorge Commission recognizes the importance of their participation in updates to the regional Comprehensive Economic Development Strategy (CEDS) as may be requested by Mid-Columbia Economic Development District, the bi-state economic development entity that coordinates the CEDS planning process.
- ~~23.~~ The Gorge Commission shall support the economic development efforts of the States of Oregon and Washington pursuant to their Economic Vitality Plan ~~economic development plans established under the National Scenic Area Act.~~ *[Port comment: revert to original language for first sentence]*. The Gorge Commission recognizes and supports the importance of the economic vitality efforts of regional and community organizations and the four treaty tribes, pursuant to their economic development strategic plans and as consistent with the purposes and standards of the Act and the Management Plan.
- ~~3.~~ ~~The Gorge Commission shall encourage the States of Washington and Oregon to coordinate their economic development planning in order to maximize the benefits of federal dollars to all Gorge communities.~~
4. Agriculture and forest industries in the Columbia River Gorge shall be protected and supported by:
 - ~~preventing fragmentation of the land base and by;~~
 - ~~minimizing interference with agricultural and forest practices from conflicting uses;~~
 - enhancing agricultural lands for agricultural uses, forest lands for forest uses and forest lands for agricultural uses;
 - being consistent with the strategies listed in the Economic Vitality Plan to provide ongoing support for these industries;
 - encouraging conservation efforts such as renewable energy and water efficiency; and
 - allowing commercial uses and events on GMA agriculture lands that are incidental and subordinate to the agricultural use.
- ~~5.~~ ~~The economic vitality of the Gorge economy shall be enhanced by encouraging growth to occur in Urban Areas.~~
- ~~6.~~ ~~New commercial uses shall be allowed outside Urban Areas on lands designated:~~
~~Rural Center.~~

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~~Commercial.~~

~~Commercial Recreation.~~

75. The following commercial uses may be allowed outside Urban Areas:
- A. Home occupations ~~and cottage industries~~ in all designations except Open Space.
 - B. Commercial recreation in appropriate recreation intensity classes throughout the Scenic Area.
 - C. Commercial uses in conjunction with public recreation on lands designated Public Recreation.
 - D. Conversion of existing industrial sites to commercial use.
 - E. ~~Wineries and farm produce stands~~ Wine sales/tasting rooms, in conjunction with a lawful winery, on lands designated Large-Scale or Small-Scale Agriculture, Commercial Forest Land, or Large or Small Woodland.
 - F. Commercial events in all GMA designations except Open Space and Agriculture Special, in conjunction with a lawful winery, wine sales/tasting room, ~~bed and breakfast inn~~ overnight accommodation, commercial use or dwelling listed in the National Register of Historic Places.
 - G. Commercial uses in all GMA designations except Open Space and Agriculture Special on a property with a building either on or eligible for the National Register of Historic Places, and that was 50 years or older as of January 1, 2006.

[Port comment: accept revisions as presented in December Version of Chapter 2, which reflects prior public input and a cleaner policy statement than as proposed. Eliminate reliance on Economic Vitality Plan]

PART III-Action Program

86. The Gorge Commission shall support the economy of Gorge communities by ~~encouraging integrating~~ integrating recreation development at appropriate rural locations with adequate infrastructure and coordinating with appropriate organizations.
7. The Gorge Commission recognizes the importance of adequate efficient and reliable infrastructure (such as water, sewer, roads, energy, telecommunications, and broadband) to protect the health and safety and to support the economic vitality of Gorge communities.

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~~9. The Gorge Commission shall recognize the special role of the five ports in the Scenic Area as providers of river transportation and recreation facilities in Urban Areas, and support their efforts to stimulate urban waterfront economic development by:~~

- ~~• Assigning priority for revisions to Urban Area boundaries to those requests involving port properties or projects.~~
- ~~• Relying upon existing state and federal wetlands regulations on the Columbia River and exempting urban waterfronts from wetland and riparian area guidelines in the Management Plan.~~

[Port comment: reinsert original language recognizing the ports' role in economic development in the urban areas.]

8. The Oregon Investment Board and the Washington Investment Board review economic development proposals for loans and grants in the National Scenic Area and recommend the projects for federal funding appropriated for this purpose. The Gorge Commission encourages the States of Washington and Oregon to coordinate their economic development efforts in order to maximize the benefits of federal dollars to all Gorge communities.

A. Prior to the approval of any grant under the states' plans for economic development projects pursuant to Section 11 of the National Scenic Area Act, the Gorge Commission shall certify that all activities undertaken under the grant are consistent with the purposes of the National Scenic Area Act, the Management Plan, and land use ordinances adopted pursuant to the National Scenic Area Act.

B. If such activities would take place wholly within an urban area, the Gorge Commission shall, after consultation with the appropriate city or county, certify that the activities are consistent with the National Scenic Area Act, the Management Plan, and land use ordinances. The Gorge Commission shall maintain this certification process so that it is simple, efficient, and speedy to not delay consistent activities. The details of economic development projects shall be confidential consistent with Gorge Commission rules on disclosure of public records.

~~11. In consultation with the States of Washington and Oregon and Gorge counties, and after public hearings, the Gorge Commission established a process for certifying that activities to be undertaken under a grant pursuant to Section 11 of the Scenic Area Act are consistent with the purposes of the Scenic Area Act, the Management Plan, and land use ordinances adopted pursuant to the Scenic Area Act. The Gorge Commission shall maintain this certification process so that it is simple, efficient, and speedy to not delay consistent activities. The details of economic development projects shall be confidential consistent with Gorge Commission rules on disclosure of public records.~~

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Gorge2020 Focus Topic: Economic Vitality

Background on the Economic Vitality Focus Topic

Role of the Commission to date in Economic Development:

The two purposes of the National Scenic Area (NSA) Act passed in 1986 by Congress are:

- (1) to establish a national scenic area to protect and provide for the enhancement of the scenic, cultural, recreational, and natural resources of the Columbia River Gorge; and*
- (2) to protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with paragraph (1).*

The Commission is involved in activities and partnerships that serve to support economic development in the Columbia River Gorge in several ways, including but not limited to: approval of local Economic Loan Certifications that are consistent with the goals of NSA Act; encouraging and supporting bi-state cooperation, collaboration and innovation on initiatives of regional significance; and developing methods to better track and measure economic vitality using the Vital Sign Indicators initiative process.

Role of the Economic Vitality Work Group:

In 2018, Commission and Forest Service staff organized an Economic Vitality Work Group (EVWG) with 28 representatives from Oregon and Washington businesses, non-profits involved with tourism and recreation, and other economic interests. EVWG participants were invited to join because they have expertise and represent different economic sectors or organizations that specialize in economic development/coordination in the NSA. The three main tasks asked of the Economic Vitality Work Group are:

- Review the Chapter 2 Economic Development part of the Management Plan and provide input on information that needs to be updated/revised, added or deleted because it is no longer relevant, and to identify the “gaps”;
- Discuss the Vital Sign Indicators for Economics recommended in 2009 and determine if these are the most relevant indicators in the NSA that can be monitored over the next decade and identify who might be the entity to monitor and track outcomes; and
- Provide input to the Commission about staff’s current role implementing the two purposes of the NSA Act and identify if any changes should be considered.

The staff requested that each EVWG participant review the Economic Development Chapter of the Management Plan and provide initial thoughts on what is and is not working in the current chapter, as well as what gaps may exist that should be considered in the updated version. Staff requested that the updates to the chapter be strategic and provide concrete examples for how the Commission supports economic development, while protecting the resources.

Through the EVWG meetings, the participants provided input to the staff of the Gorge Commission and the Forest Service, and suggested changes to the Chapter. These suggested edits represent the views of the EVWG members and are subject to reviewed for consistency by the Commission staff and the Forest Service staff before they are brought to the Commission as final recommendations.

Economic Development Chapter Draft Edits (as of 12/01/19)

Background: This is a compilation of input received from the Economic Vitality Work Group (EVWG) on the Economic Development Chapter of the Management Plan. Below is the original language in each section of Chapter 2 in black, with suggested edits and proposed new language in blue, compiled from the EVWG meetings on June 13, August 15, October 10, November 28, 2018 and January 23, and September 24, 2019.

All the suggested edits below are *draft edits* provided by the EVWG. These draft recommendations will be presented to the Commission on December 10, 2019 for discussion and guidance.

Black = original language

~~Strikethrough~~ = language proposed for removal by EVWG

Blue text = new suggested text agreed upon by workgroup participants

Economic Development

~~The Columbia River Gorge is home to 55,000 people. The second of the Act's two stated purposes~~ **The Columbia River Gorge National Scenic Area spans 85 miles of the Columbia River and includes 292,500 acres of diverse landscapes and 13 urban communities.** Congress intended the **National** Scenic Area Act to support the economy of their communities in the **National** Scenic Area. ~~The second of the Act's two stated purposes~~ **One 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 protection of scenic, cultural, recreation, and natural resources [Section 3(2)].”

The term “economic vitality”, as used in this chapter, refers to a strong and diverse economy that contributes to an enhanced quality of life. As stated in the National Scenic Area Oregon and Washington Economic Vitality Plan: “The purpose of the National Scenic Area Oregon and Washington Economic Vitality Plan is to set forth a vision and strategies for enhancing the economy and quality of life of Oregon and Washington communities located within the National Scenic Area”. The economic vitality of the National Scenic Area and the health of the scenic, natural, recreational, and cultural resources of the Columbia River Gorge are interdependent. The goals and policies in this chapter support the Gorge's economic sectors, such as agriculture, forestry, and tourism, while allowing new commercial uses on lands designated Rural Center, Commercial, and Commercial Recreation.

This chapter focuses on the General Management Area as the primary location for commercial development. The Special Management Area includes the region's most sensitive lands and resources. In the Act, Congress explicitly limited new development in the SMA, and directed that commercial development take place outside of SMA.

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GMA Policies

1. The Gorge Commission shall consult with the States of Washington and Oregon in the ~~development and implementation of state and regional economic development plans.~~ [States' updates to their coordinated Economic Vitality Plan developed pursuant to Section 11 of the National Scenic Area Act.](#)
2. [The Gorge Commission recognizes the importance of their participation in updates to the regional Comprehensive Economic Development Strategy \(CEDS\) as may be requested by Mid-Columbia Economic Development District, the bi-state economic development entity that coordinates the CEDS planning process.](#)
3. The Gorge Commission shall support the economic development efforts of the States of Oregon and Washington pursuant to their economic development plans established under the [National Scenic Area Act.](#) [The Gorge Commission will support and recognize the importance of the economic vitality efforts of regional and community organizations and the four treaty tribes, pursuant to their economic development strategic plans and subject to consistency with the purposes and standards of the Act and the Management Plan.](#)
4. The Gorge Commission shall encourage the States of Washington and Oregon to coordinate their economic development [planning efforts](#) in order to maximize the benefits of federal dollars to all Gorge communities.
5. Agriculture and forest industries in the Columbia River Gorge shall be protected and supported by:
 - preventing fragmentation of the agricultural and forest land base,
 - minimizing interference with agriculture and forest practices from conflicting uses
 - [enhancing agricultural lands for agricultural uses, forest lands for forest uses and forest lands for agricultural uses](#)

- being consistent with the strategies listed in the Economic Vitality Plan to provide ongoing support for these industries.
 - encouraging conservation efforts such as energy and water efficiency.
6. The economic vitality of the Gorge economy shall be enhanced by encouraging growth to occur in Urban Areas.
 7. The Commission shall provide a clear process for urban area boundary revisions and shall coordinate with land use management agencies in the General Management Area (*cite reference in new 2020 Management Plan after Urban Area Boundary Policy adopted*).
 - ~~6. New commercial uses shall be allowed outside Urban Areas on lands designated:
 - A. Rural Center
 - B. Commercial
 - C. Commercial Recreation~~
 - ~~7. The following commercial uses may be allowed outside Urban Areas:
 - A. Home occupations and cottage industries in all designations except Open Space.
 - B. Commercial recreation in appropriate recreation intensity classes throughout the Scenic Area.
 - C. Commercial uses in conjunction with public recreation on lands designated Public Recreation.
 - D. Conversion of existing industrial sites to commercial use.
 - E. Wineries and farm produce stands on lands designated Large-Scale or Small-Scale Agriculture, Commercial Forest Land, or Large or Small Woodland.
 - F. Commercial events in all GMA designations except Open Space and Agriculture Special, in conjunction with a lawful winery, wine sales/tasting room, bed and breakfast inn, commercial use or dwelling listed in the National Register of Historic Places.
 - G. Commercial uses in all GMA designations except Open Space and Agriculture Special on a property with a building either on or eligible for the National Register of Historic Places, and that was 50 years or older as of January 1, 2006.~~
 8. The Gorge Commission shall allow commercial uses that are consistent with land use designations contained within this document and consistent with the resource protections policies and guidelines.
 9. The Gorge Commission shall support the economy of Gorge communities by encouraging integrating recreation development at appropriate rural locations with adequate infrastructure and coordinating with appropriate organizations.
 10. The Gorge Commission shall acknowledge the importance of adequate infrastructure (such as water, sewer, roads, telecommunications, and broadband) to protect the health and safety and to support the economic vitality of Gorge communities.

11. The Gorge Commission shall recognize the ~~special~~ **unique** role of the ~~five~~ ports in the **National** Scenic Area as providers of river transportation, and recreation facilities, ~~in Urban Areas, and support their efforts to stimulate urban waterfront economic development by:~~ **and as developers of infrastructure to support economic vitality. The Gorge Commission shall support their efforts to stimulate economic development by:**

- Assigning priority for revisions to Urban Area boundaries to those requests involving port properties or projects.
- Relying upon existing state and federal wetlands regulations on the Columbia River and exempting urban waterfronts from wetland and riparian area guidelines in the Management Plan.

12. Prior to the approval of any grant under the states' plans for economic development projects pursuant to Section 11 of the **National** Scenic Area Act, the Gorge Commission shall certify that all activities undertaken under the grant are consistent with the purposes of the **National** Scenic Area Act, the Management Plan, and land use ordinances adopted pursuant to the **National** Scenic Area Act.

If such activities would take place wholly within an Urban Area, the Gorge Commission shall, after consultation with the appropriate city or county, certify that the activities are consistent with the **National** Scenic Area Act, the Management Plan, and land use ordinances. *(moved up from 11)* The Gorge Commission shall maintain this certification process so that it is simple, efficient, and speedy to not delay consistent activities. The details of economic development projects shall be confidential consistent with Gorge Commission rules on disclosure of public records

~~11. In consultation with the States of Washington and Oregon and Gorge counties, and after public hearings, the Gorge Commission established a process for certifying that activities to be undertaken under a grant pursuant to Section 11 of the Scenic Area Act are consistent with the purposes of the Scenic Area Act, the Management Plan, and land use ordinances adopted pursuant to the Scenic Area Act.~~