

May 12, 2020

**VIA EMAIL**

Columbia River Gorge Commission  
c/o [connie.acker@gorgecommission.org](mailto:connie.acker@gorgecommission.org)

**Re: Comments on Gorge 2020 Urban Area Boundary Revisions**

Dear Chair Liberty and Commissioners:

We, the signatories to this letter, have been stakeholders and participants in the Gorge 2020 process since the beginning. We have participated, individually and collectively, in workshops, open houses, listening sessions, and Columbia River Gorge Commission (“Commission”) meetings, in addition to engaging our own constituents and stakeholders to encourage participation in the Gorge 2020 process. The process now seems to be a race to the finish in the midst of the Covid-19 crisis when many otherwise engaged stakeholders and communities are focused on the health and well-being of their families and livelihoods.

The Commission is proposing significant changes in policy that will have permanent, long-term ramifications on our Gorge communities and economies. We are particularly concerned about the recently released redline that proposes to rewrite the entire urban area boundary revision section of the management plan. The proposed language is far from providing a “clear and concise way to get to approval,” which was something both the Commission and the public were seeking from this amendment process.

Giving the public and stakeholders three business days to review the proposed redline language is unrealistic in any situation, let alone during this pandemic. It is disingenuous to expect the public and stakeholders to provide meaningful public comments during the May 12 work session with such notice and this being the first time the public has seen redline language that seeks to implement months and years of Commission discussion over urban area boundary revisions. The Commission needs to hear from the public and stakeholders given the significance of the proposed policy changes and have time to take into consideration such comments prior to making “endorsements” on what will very well likely be final language.

The Commission never finished the conversation about what amounts to “minor” for purposes of processing an application. There was discussion at the November 2019 Commission meeting about what amounted to “minor” including the discussion that 20 acres or 1 percent could be considered minor but the record reflects that other conversation was needed as there was insistence from other commissioners that applications greater than 20 acres or 1 percent could also be considered minor. There was also disagreement on whether the 20 acres or 1 percent threshold should be cumulative. In addition to the issue of what amounts to “minor,” we have several concerns about the proposed redline. For example, there are open-ended policy statements that allow for policy making on a case-by-case basis (e.g., policies 8, 10, 12, 13). There are unnecessary timing constraints for filing an application that may or may not align with state-required process. An overarching question is whether the Commission will process any

application at all based on a reading of proposed policy 1 and the budgeting requirements in policy 5.

These reflect some of our collective concerns and many of us would like an opportunity to provide more detailed comments into the record before the Commission considers and endorses any proposed redline language. **We therefore respectfully request that the Commission (1) defer action on May 12, (2) allow for public comment on the proposed redline through June 1, 2020, and (3) review and consider the public comments during the June Commission meeting before taking action on the proposed redline.** Thank you for your consideration of these concerns and comments.

Respectfully submitted,

Jessica Metta  
Executive Director  
Mid-Columbia Economic Development District



Joan Silver, Chair  
Economic Development Commission  
Wasco County



Mayor Rich Mays  
City of The Dalles



Chair Scott Hege  
Wasco County



Andrea Klaas  
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