



PLANNING DEPARTMENT

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

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September 8, 2020

Columbia River Gorge Commission
PO Box #730
White Salmon, WA 98672
(Sent by email to connie.acker@gorgecommission.org)

Subject: Gorge 2020 Management Plan Comments

Greetings Commissioners,

Thank you for the opportunity to provide comment on your final deliberations regarding proposed changes to the Management Plan. Your agenda highlights four final categories and your website indicates a clarified land use designation map will be voted upon today. This letter is largely focused on these topics but to be clear, concerns included in my prior comment letters still stand.

I commend your efforts to develop a diversity, equity and inclusion plan. At this point in time, I do not have any suggested language revisions. I look forward to hearing more about this important work.

“No Loss of Wetlands” is an admirable goal for resource protection, but it is simply not feasible in a landscape that includes both sensitive resources and critical infrastructure. The Columbia River and its multitude of tributaries and nearby water features is developed with major bridge crossings, an interstate and several state highways, two railroads, recreation development that intentionally bring visitors to water features, and culturally significant river access. As proposed, the modified language implies safety related development may occur in wetlands as long as it does not result in loss of feature acreage or function. It is physically not possible to add or modify development to a water feature or its buffer without displacing it in some form. Furthermore, there has been no analysis for the Commission’s consideration of the impacts and unintended consequences that this decision will bring. Requiring a standard of No Loss equates to no maintenance or modifications of critical infrastructure, posing an unnecessary safety risk and undermines our regional resilience for natural hazards planning. Please reject the proposed standard of No Loss and retain the current standard of No Net Loss, which carries the same resource protection obligations of No Adverse Effect (including considerations of cumulative effects) and is consistent with the National Scenic Area Act.

I support the addition of cider and locally grown produce to the revised document but would prefer that the language was expanded to include all agriculture products. This would allow for farmers and future farming advancements to employ agriculture uses on agriculture lands as the market demands – supporting our local farming families and agriculture economy. Conditional use permitting mechanisms are currently used and will continue to be used to ensure agriculture processing and production do not adversely impact SNCR resources, surrounding farm and forest lands, nearby residents, or community services. Limiting crop type will not address the underlying concerns expressed by Commissioners at recent meetings which were largely focused on commercial events and the industrial nature of production in any form (scale of production, odors, noise, traffic, etc.). Please reevaluate the tools needed to address your actual concerns and do not unnecessarily restrict farmers from farming. Agriculture is protected by the Act for more than its aesthetic and density.

“Clarifications, non-controversial and minor edits” are not necessarily non-substantive edits. Due to the short period of time in which to review the final revised document, it is simply not clear yet how substantive any of these changes may be. One example of a possible substantive “minor edit” includes the addition of language that states: “...and requirements to bring pre-Act development into compliance with National Scenic Area standards...” (page 15). Under current regulations, pre-Act development is not required to comply with the Act unless it is being replaced with new development. Additions and modifications would be subjected to compliance, but not the pre-Act portions of the structure. As proposed, this language is lacking context needed to be clear and it is controversial.

I welcome the progress of the clarified Land Use Designation maps (zoning maps) and appreciate the effort that has been invested to develop them. However, as with the Commission’s recent adoption of clarified Urban Area Boundary maps, the lack of landowner notification is concerning. The clarified lines have real impacts to private property and in some cases change the development options, permitting requirements and jurisdictional authority. Without notification, landowners have no way to express concern before changes are finalized. Please provide landowners notification of all clarified maps and the process in which to share feedback. If funds are a limiting factor for notification, please inform the counties so we can budget for it.

The Urban Area boundary expansion policy decision of “fifty acres forever” is problematic and should be removed prior to final approval. The Act does not require the Commission to identify a cap or maximum number of acres for minor modifications. In doing so, you are arbitrarily concluding the options available to 13 cities and communities that vary dramatically in scale and needs.

Commission staff efforts are to be commended; they have clearly worked very hard to produce a product that attempts to thread together public comment and Commission direction. What is not clear is why the Commission has elected to rush the process and finish the update without adequate analysis or landowner notification. Stakeholders had 30 days to review the first 500+ page draft and six days to review the revised final draft. This timeframe is insufficient for the public and stakeholders to provide meaningful comments.

Wasco County has raised issues and concerns with the proposed revisions to the Management Plan in written and oral testimony throughout the Gorge 2020 process. The

County reiterates its concerns with respect to the September Draft and reserves its right to argue on appeal issues that were not previously addressed in the County's written and oral testimony. The County should not be prejudiced on appeal by the unreasonably short period of time to review and provide meaningful comments on a policy document that has long-lasting, if not permanent changes to NSA policy.

Thank you again for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Angie Brewer". The signature is written in a cursive, flowing style.

Angie Brewer, AICP
Planning Director