



Columbia River Gorge Commission
57 NE Wauna Avenue
White Salmon, WA 98672

Re: Economic Development Chapter of the CRGNS Area Management Plan

Dear Commissioners,

Thank you for the opportunity to provide comments on the draft economic development chapter of the management plan. I applaud your efforts to undertake updates to the Management plan and balance the variety of perspectives and interests affecting the Columbia River Gorge National Scenic Area.

There are a few proposed updates in this draft chapter I think are important to retain and adopt:

- Economy and community references. Including reference to supporting the economy of communities in the NSA by using the **terminology “One of the Act’s two stated purposes”** ensures that the Commission seeks to harmonize between both natural/recreation/scenic/cultural resources and economy/communities. As the vision of the Act included both of these elements, the Management Plan should carry forth that vision to **balance and harmonize**.
- Inclusion of a **focus on adequate infrastructure** that will align with one of the original policies in the plan to encourage growth to occur in Urban Areas. Infrastructure is critical to long term success for communities and their economies. The policy does not ask the Commission to be involved in developing, funding or prioritizing infrastructure as those implementation roles are carried out by economic development agencies throughout the region. It does, however, ask the Commission to perform its primary role as a land use regulatory agency and to provide processes to allow for infrastructure, with expedited reviews as necessary. Examples of areas in which this becomes important include:
 - Issues relate to the **scale of some infrastructure**, such as Interstate 84 and Highway 14 which cannot be completely visually subordinated but may be mitigated and are necessary for efficiently transporting goods and people.
 - Issues related to **expediency in review** of infrastructure that may have an impact to **health and safety**, such as a water system outside an urban area, with funding on the line that requires quick action to secure.
 - **Infrastructure crossing between GMA and urban areas**, such as utilities – including broadband—that are core to ensuring growth can occur within the urban areas and reduce further expansion requirements.
 - Infrastructure necessary to support the urban areas that may have a segment outside of the urban area. For example, the importance of

education and educational facilities is reflected in the comprehensive economic development strategy prepared by MCEDD.

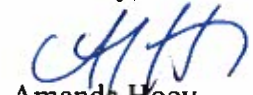
- For the proposed infrastructure policy, use of the word “**shall recognize**” instead of the word “recognizes.” I encourage retaining the language “shall recognize” as it is consistent with the language use in the other policies for the Management plan within this chapter and demonstrates ongoing intention as infrastructure needs are not static.
- Including a policy that the Commission shall provide a clear process for urban area expansion. While there is a separate chapter devoted to this item, the plan cross-references in many areas.
- Clarifying the policy on **commercial uses in the GMA**. The proposed policy removes what was previously a limited list and instead ties allowances to the underlying zoning. There was much discussion on this particular policy, but the end result proposed would provide a more equitable policy that can be applied to dynamically changing industries as well as the current state.

References to economic vitality plans are included in a couple of the policies in this chapter. The proposed language would update the original chapter to better reflect current and future status. When the Management Plan was originally adopted, there were two Economic Development Plans – one for each state. The Management Plan referred to those as separate documents and also included policy on coordinating efforts. With MCEDD’s leadership and the action of the Bi-State Advisory Council, these plans have since been coordinated into a single “Economic Vitality Plan” and aligned with the Comprehensive Economic Development Strategy produced by MCEDD. The plan includes separate chapters to address the individual needs of each state. The coordinated plan allows for a more dynamic document that can accommodate a bi-state region and changing economic development needs. The Commission is consulted in the process, but does not provide action in relation to the plans. These documents are outlined in the Act and approved by the States and USFS.

This particular chapter will be heavily impacted by revisions made in other chapters. I encourage the Commission to add the “E” (Economy) to “SNCR”s (Scenic, Natural, Cultural and Recreational) in other chapters as well and continue to take into consideration the balance between the two purposes of the Act.

Thank you.

Sincerely,



Amanda Hoey
Executive Director