



TO: Columbia River Gorge Commission
FROM: Michael Lang, Friends of the Columbia Gorge
RE: Friends' comments on the Economic Development Draft Revisions 4.23.2020
DATE: April 27, 2020

Thank you for the opportunity to comment on the draft revisions for Economic Development chapter of the Management Plan dated April 23, 2020. Friends of the Columbia Gorge (Friends) is a nonprofit conservation organization with approximately 6,500 members dedicated to the protection and enhancement of the scenic, natural, cultural and recreation resources of the Columbia River Gorge area. Friends supports livable, well-planned communities within the National Scenic Area.

The staff report along with all other meeting materials were posted after the close of business on Wednesday, April 22. This provided little more than two business days to submit written comments prior to the 12:00 p.m. deadline on Monday, April 27 for your consideration at the meetings scheduled for April 28, and April 29. As a result, these comments are preliminary. Friends asks the Commission to postpone any decisions based on the topics covered in the staff reports until the public has had an adequate time to review them and provide comments.

GMA Policies

Draft Policy 3. Page 2.

Recommendation: Require the Economic Development Plan to be consistent with the National Scenic Area Act and the Management Plan. (Staff draft revisions in red. Friends recommended text in blue.)

23. The Gorge Commission shall support the economic development efforts of the States of Oregon and Washington pursuant to their **Economic Vitality Plan, as long as these efforts are consistent with the National Scenic Area Act and its Management Plan.** ~~economic development plans established under the National Scenic Area Act.~~ 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.

Draft Policy 4, Page 2.

Recommendation: Since industrial development is prohibited in the Scenic Area, delete “industries” and replace it with “uses.” Delete text allowing commercial uses in agricultural zones. Commercial uses in agricultural zones are addressed in Part 2, Chapter 7 of the Management Plan. (Staff draft revisions in red. Friends recommended text in blue bold.)

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 **uses 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.~~

Current Policy 5. Page 3.

Recommendation: Retain this critical reference to the second purpose of the National Scenic Area Act. This is one of the most important functions of the National Scenic Area Act and Management Plan. (Friends recommends retaining the text in blue.)

5. The economic vitality of the Gorge economy shall be enhanced by encouraging growth to occur in Urban Areas.

Current Policy 7, New Policy 5. Page 3.

Recommendation: Policy F. below would allow commercial events at all overnight accommodations. It would allow them in all land use designations except Open Space and Agriculture Special. This would include short term rentals if the Commission revised the Management Plan to allow these commercial uses. This is a major expansion of commercial uses and events within the Scenic Area without any analysis of the effects. Friends recommends deleting this policy and relying on Part II of the Management Plan to define what commercial uses are allowed in which zones. (Friends recommended text in blue.)

75. The following commercial uses may be allowed outside Urban Areas:

~~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.~~