

Gorge 2020 Economic Vitality Comments and Responses  
 June 1-September 8, 2020

	Page	Topic	Comment	Response
1	391	Econ	<p>My proposed changes are to GMA Policies; This is the only place in the draft plan that a specific product or occupation is mentioned. This should be stated in generic terms and not be specific to any single product or occupation. Wine and wine sales are important but there are several similar products that would have similar if not the same impacts on the National Scenic Area. They all should be treated the same.</p> <p>GMA Policy 6.E., Replace with:            E. Produce or product sales or tasting facilities, in conjunction with a lawful production facility, on lands designated Large-Scale or Small-Scale Agriculture, Commercial Forest Land, or Large or Small Woodland.</p>	<p>On 9/8/20 the Gorge Commission voted to added "cideries" to allowances for wineries in the GMA. This will allow cideries in the Land Use Designations where wineries are allowed, under the same guidelines for wineries in the Management Plan. This will also allow cider sales and tasting rooms as a review use, using the same guidelines for wine sales and tasting rooms, including allowing commercial events at these venues. The Gorge Commission will consider adding an amendment for allowing "incidental produce or edible product sales" at its October 2020 meeting, but stated that it does not want to allow commercial events at these venues.</p>
2	391	Econ	<p>GMA 6.F. Replace with;            F. Commercial events in all GMA designations except Open Space and Agriculture Special, in conjunction with a lawful produce or product sales/or tasting facility, commercial use, or dwelling listed in the National Register of Historic Places.</p>	<p>See response to Comment 1. The Gorge Commission decided to keep the language in the Draft Management Plan clarifying that fruit and produce stands are not a commercial use, and therefore cannot hold commercial events.</p>
3		Econ	<p>I support your efforts to provide for orderly and sensible means that allow for economic growth in the Columbia River Gorge and hereby support your resolution that would stifle economic growth.</p>	<p>The Draft Economic Development Chapter approved by the Gorge Commission states: "One of the National Scenic Area 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)]." And this chapter states the following GMA Goals for Economic Development:            "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,</p>

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				cultural, recreation, and natural resources of the Columbia River Gorge."
4		Econ	Counties and cities in the NSA need a regional strategy to effectively address areas of impediments for affordable housing which is closely linked with economic development in the NSA. The NSA has grown exponentially and will only continue to grow which threatens the resources and values that the ACT was created to protect.	There are no specific policies or guidelines to support affordable housing in the Management Plan. The Gorge Commission is aware of affordable housing issues in the urban areas.
5	390	Econ	The EDC appreciates acknowledgement of adequate infrastructure as critical to supporting existing communities. These investments are critical to supporting the residents and agricultural enterprise in the Gorge as well as resource protection.	The Gorge Commission adopted specific language to address adequate infrastructure: Economic Development Chapter, GMA Policy 8: "The Gorge Commission recognizes the importance of adequate, efficient, and reliable infrastructure (such as water, sewer, transportation networks, energy, telecommunications, and broadband) to protect health and safety, and to support the economic vitality of the Gorge."
6	390	Econ	The EDC also appreciates the acknowledgement of the importance of the region's Comprehensive Economic Development Strategy in the draft chapter. This strategy provides a framework for economic development efforts in the region and is updated every five years through robust stakeholder engagement to reflect the local community's needs.	The Gorge Commission adopted language acknowledging the importance of the region's Comprehensive Economic Development Strategy: Economic Development Chapter, GMA Policy 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."

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7	391	Econ	<p>However, the EDC has concerns about reducing opportunities for agricultural producers to incorporate value added efforts like cider for apples, fruit stands, or events that support their primary agricultural use if they can be done with adequate public safety needs met as ensured by the local review process. As noted above, for these producers the ability to sell direct to consumers or process their own crops to add value can support continuation of farming for these businesses. These smaller producers, along with larger cherry, wheat, and cattle production provide the foundation of our local economy. Continuing the working landscape is in line with the Act and is a prime opportunity for the Gorge Commission to support both purposes outlined.</p>	<p>See responses to Comments 1 and 2. The Gorge Commission has not approved any amendments that will limit existing allowances for commercial uses and events.</p>
8	392	Econ	<p>The Port requests that the Commission add back the two bullets deleted from the Policy 9 language. The bullets recognized the important role of ports in the Gorge and are needed to carry out the legislative directive contained in ORS 777.065.</p>	<p>The Gorge Commission recognizes the important role of ports in economic development but decided that a focus just on ports and not other economic drivers was not recommended.</p>

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9	389	Econ	<p>The Act does not require that economic activities, particularly in the urban areas, be “harmonized” with protection of the SNCRs. There is no evidence in the record documenting direct and indirect effects from climate change on the Gorge’s economic sectors; therefore, the Port suggests the revised language [proposed language in bold, deleted language in bold strikeout]:</p> <p><b>"The goals and policies in this chapter support the vision of a thriving economy within the Gorge supporting diverse business opportunities that operates in harmony with the National Scenic Area's qualities, values, and resources, especially with the Gorge's principal the Gorge's principal economic sectors, such as agriculture, forestry, high tech, health care, manufacturing and processing, and tourism. 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. The Gorge Commission recognizes that climate change may affect many of the region's current economic sectors and supports economic development that contributes to reducing climate change impacts."</b></p>	<p>One of the National Scenic Area 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 Commission-approved language in the Draft Management Plan reflects this. The language in the Climate Change Chapter and the Economic Development Chapter recognizing that climate change affects economic sectors is based on general conclusions highlighted in the report provided to the Gorge Commission, "Summary of Climate Change Effects in the Columbia River Gorge National Scenic Area" (Wozniak 2019). While this report did not find an economic impact analysis of climate change specific to the NSA, it describes economic impacts identified in national and state assessments that are relevant to the NSA. The Draft Management Plan text is consistent with the findings in this report.</p>
10	391	Econ	<p>Policy 6. The Port opposes the proposed revisions to the Land Use Designations that eliminate rights landowners otherwise enjoy under state law as the proposed changes are inconsistent with the Act and exceed the Commission’s authority. Commercial activities on rural resource lands can be carried out consistently with the SNRCs. An all-out ban on such activities is overreaching. The Act requires that commercial and residential development outside urban areas take place without adversely affecting the SNRCs. See Act, § 544d(d)(7) and (8). Such activities are permissible under the Act as long as conducted in a manner that does not result in adverse impacts to SNRCs.</p>	<p>See responses to Comments 1 and 2. The Gorge Commission has not approved any amendments that will limit existing allowances for commercial uses and events.</p>

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11	392	Econ	GMA policy 8: The Gorge Commission recognizes the importance of adequate, efficient and reliable infrastructure (such as water, sewer, roads, energy, telecommunications, and broadband) to protect health and safety, and to support the economic vitality of the Gorge. <i>ODOT supports this language; however, the reference to roads is limiting and recommend replacing "roads" with "transportation network" to include items wider than just a specific strip of asphalt (broadening to network acknowledges the role of transit, bridges, or cycling, for example).</i>	This suggestion was incorporated in GMA Policy #8. The new text is: "The Gorge Commission recognizes the importance of adequate, efficient, and reliable infrastructure (such as water, sewer, transportation networks, energy, telecommunications, and broadband) to protect health and safety, and to support the economic vitality of the Gorge."
12	390	Econ	Policy 3. Friends supports the changes to this draft policy to require the Economic Development Vitality Plan to be consistent with the National Scenic Area Act and the Management Plan. However, it is unclear what it means to say the Gorge Commission shall support the efforts of Oregon and Washington. We recommend deleting the word "shall" from the first sentence.	The phrase "shall support" was deleted and replaced with "supports" in the first sentence. The new text is: "The Gorge Commission supports 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 the Management Plan..."
13	390 391	Econ	Policy 4. Delete text allowing commercial uses in agricultural zones. Limited commercial uses in agricultural zones are addressed in Part 2, Chapter 7 of the Management Plan. The draft Policy 4 could be interpreted in a way that conflicts with the limited commercial uses allowed in agricultural zones.	The Management Plan already allows some uses in agricultural zones as noted in Part 2, Chapter 7. The Gorge Commission added Policy 4.F to provide this example of how agriculture industries are protected by allowing some commercial uses on GMA agriculture lands that are incidental and subordinate to the agricultural use: "4. Agriculture and forest industries in the Columbia River Gorge shall be protected and supported by: F. Allowing commercial uses on GMA agriculture lands that are incidental and subordinate to the agricultural use."
14	391	Econ	Policy 5. The economic vitality of the Gorge economy shall be enhanced by encouraging growth to occur in Urban Areas. Comment: Friends supports the retention of this policy and clarifying that it refers to the existing boundaries of the urban areas in the National Scenic Area.	This policy was retained.

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15	391	Econ	Policy 6. F. could be interpreted to allow commercial events at all commercial uses, including home occupations and overnight accommodations. This conflicts with the policies and guidelines for home occupations and 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. If this interpretation is correct, this would be a major expansion of commercial uses and events within the Scenic Area without any analysis of the effects. Friends recommends either deleting this policy or deleting the term "commercial use" from the guideline.	To clarify that commercial events are not allowed at overnight accommodations, staff added the following guideline to the Draft Management Plan under "OVERNIGHT ACCOMMODATIONS" in Part II, Chapter7: "1. E. Commercial events are not permitted at overnight accommodations." Home Occupations are currently considered a commercial use in the Plan. The Gorge Commission did not discuss changing this.
16		Econ	Friends supports the draft revisions to policies 7 through 11.	No changes to the draft policies #7-11 were made after the Draft Management Plan was released for public comment on June 1, 2020.
17	390	Econ	Appreciate amendment of GMA Policy 2 re: Comprehensive Economic Development Strategy.	The Gorge Commission approved adding Policy 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."
18		Econ	Concerned that the economic development chapter revision is limiting opportunities for value-added agriculture, including agritourism. Need to have a balance between protecting scenic, natural, cultural, and recreation resources and protecting and supporting the economy of the Columbia River Gorge. Revisions to the Management Plan will affect the livelihoods of those who live and work here for the next 20-30 years.	See responses to Comments 1 and 2. The Gorge Commission has not approved any amendments that will limit existing allowances for commercial uses and events.