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June 29, 2020

Krystyna Wolniakowski, Exec. Dir.
Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98672

Ms. Wolniakowski:

This letter is in response to the request for comments regarding the Gorge 2020 DRAFT Management Plan. The proposed changes to the Management Plan are broad, substantive, and affect each of its sections. The culmination of nearly two years work by CRGC staff and various ad-hoc committees, the nearly 500 pages of updated language contained in the draft Management Plan were released on June 1 with comments required to be submitted within 30 days.

Given the length of the document, the breadth and scope of the changes proposed, and the complications resulting from the COVID-19 pandemic (and the additional requirements associated with it), we have been unable to fully review the draft Management Plan within the time allotted. We consider it unreasonable for the CRGC to expect a document that has taken 24 months to update to be reviewed—and thoughtful comments submitted—within one month. If the CRGC truly desires public comment, it should avoid rushing through the process and, instead, provide adequate time for those potentially impacted by the proposed changes to fully read and comprehend the proposed plan.

Despite having insufficient time to fully review the draft document, the following issues stand out from the myriad changes proposed:

1. The language concerning urban area boundary revisions fails to establish a consistent, objective standard against which such revisions are assessed and, instead, creates a subjective, case-by-case assessment based on “the Commission’s discretion”. Whether this is due to an inability to agree on an objective policy or a desire to provide the CRGC with the freedom to make decisions on an ad-hoc basis, we believe the proposed language is neither appropriate nor effective. The result is a management plan that fosters inconsistency, creates a process without predictability, and invites endless lawsuits.
2. Though there has been considerable talk concerning the “second purpose of the Act” that requires the CRGC to “to protect and support the economy of the Columbia River Gorge...by allowing economic development in a manner consistent with the first purpose of the Act”, it appears to have had little impact on the proposed Management Plan. To the contrary, the changes offered are consistent with a concerted effort to prevent nearly any future growth or economic development outside the urban areas. To date, we have operated with the understanding the CRGC sought to identify how economic development could be integrated and managed in ways that minimized the impact on the natural environment, but we do not see this reflected in the language produced.

3. The CRGC is obligated to address urban area boundary revisions under section 544b(f) of the National Scenic Act. This is a fundamental purpose of the CRGC and there exists no provision within the Act making its fulfillment of this obligation dependent upon additional funding. The proposed language attempting to link urban area expansions to funding for the CRGC appears to be little more than an attempt to hold such expansions hostage in exchange for either payments from the requesting county (or another entity) or support for, and receipt of, additional funds in the two state budgets. We find this fundamentally inappropriate and—given no other aspect of the draft Plan has such a provision—inequitably applied.

Based on the above, and lacking adequate time for a more thorough assessment, we have no reasonable alternative but to withhold our support for the Gorge 2020 DRAFT Management Plan in its current form. We hope the Columbia River Gorge Commission will reconsider its current schedule and provide additional time to rectify the problems noted above and allow for a more comprehensive public review.

Regards,

Marc Thornsbury
Executive Director