



**BOARD OF COUNTY COMMISSIONERS**

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**VIA EMAIL**

June 30, 2020

Columbia River Gorge Commission  
c/o [connie.acker@gorgecommission.org](mailto:connie.acker@gorgecommission.org)

**Re: Wasco County – Comments on the Proposed Revisions to the Management Plan for the Columbia River Gorge National Scenic Area (Redline Draft dated June 1, 2020)**

Dear Chair Liberty and Commissioners:

Wasco County is approximately 2,395 square miles, with a considerable amount of private land located within the National Scenic Area (NSA). It is home to the City of The Dalles, the largest urban area within the NSA and has a population of over 25,000 people, 10,000 + households, and 6,500+ families

Wasco County has actively engaged in the Gorge 2020 process since the beginning. Wasco County is undertaking its own comprehensive planning project with Wasco County 2040, the process for updating the County's Comprehensive Plan. With Wasco County 2040, staff conducted roadshows, formed a citizens advisory group, maintained an interactive website with polls, blogs, and regular updates. The County tackled its work in chapters, per an established and approved work program. Being in the midst of its own process, the Board recognizes the volume of information and material involved and can appreciate the task before the Commission. However, the Commission's process has been anything but transparent and inclusive. It is riddled with procedural errors and misinformation, including releasing a draft Management Plan that did not identify new changes in redline (*e.g.*, changes to Part I Chapter 3, Natural Resources and an entirely new Climate Change Chapter in Part III). The redline errors should be corrected and the plan re-noticed so the public can see and comment on all the proposed changes. All of this in the face of a worldwide pandemic that is restricting movement of people and forcing them into a single point of interface in the form of virtual meetings if you have the technology and internet connection to connect.

Despite volumes of public comments from multiple stakeholders expressing concerns over proposed changes to the Urban Area Boundary Revisions and Land Use Designations, the Commission continues to push forward on an agenda and timeline that serves only its own purpose. The Commission is already behind on its periodic review of the Management Plan and now in the face of considerable public concern, ignores it for the sake of schedule. The Board voted unanimously on June 24, 2020, to formally oppose the Commission's proposed changes to the Urban Area Boundary Revisions section in the management Plan. Like the City of The Dalles and the Port of The Dalles, the County has repeatedly expressed its concerns with the

Commission's approach to defining "minor" and repeatedly explained why it is unreasonable to require the City to look to Dallesport for its urban land supply needs. Despite multiple conversations, explanations, and testimony (written and oral), the Commission continues to ignore these concerns, which is what prompted the Board to take formal action on June 24 in an attempt to demonstrate to the Commission and others how serious these issues are for Wasco County.

The proposed changes in the Management Plan will have permanent ramifications on Wasco County and negatively affect its resident. The Commission appears to be giving more credence to out of area urban users of the Gorge than to the people that live and work in the Gorge. The revised Management Plan will eliminate rights currently held by property owners and impose new development and design standards, which the County maintains are not necessary to protect the SNRCs or meet the standards in §544d(d)(7) and (8).

The Commission's definition of "minor" in §4(f)(1) will result in a no growth policy when the County is facing a diminishing industrial land supply. MCEDD identified in its SWOT analysis a threat from a dwindling housing supply, particularly affordable and workforce housing. The Commission needs to accept that not all housing can be resolved simply by increasing density. The County will not be able to comply with Oregon's urban land inventory requirements and will be prevented from growing to accommodate new public service, housing, and employment and commercial/industrial opportunities. It seems unfathomable that Congress would impose the high hurdles in the §4(f)(2) approval criteria and then limit an urban boundary revision to 20 acres or 0.36 percent growth. While the County maintains that numeric threshold for "minor" is not the right approach because it does not treat all urban areas the same, the County would support the City of The Dalles' alternative of 10 percent as long as there was no cumulative cap on acreage over time.

### **Recommendations**

In addition to the comments and recommendations from the Wasco County Planning Director and the Wasco County Economic Development Commission, the County recommends the following:

- Adopt the revision to the Management Plan in Parts or Chapters. This is the approach Wasco County is taking with Wasco County 2040 and it helps resolve easier issues while spending more time on the more controversial, difficult issues.
- Do not roll back land use privileges on rural lands that are currently allowed under state law and the Management Plan.
- Do not remove references to Senator Hatfield and his quote or the vision language in the Introduction that recognizes that an urban area may expand over time, even at some cost to the SNRCs. This language is important to frame how the Commission must balance the two purposes of the Act.
- Remove the requirement for a bridgehead city to consider land outside of its home state. This requirement is arbitrary and unfeasible. A bridgehead city would not have

jurisdiction over land in the different state, would not be able to promulgate land use regulations for the land, and would not be able to include the land in its tax base. What the Commission is effectively requiring would be a state boundary adjustment to allow a bridgehead city to regulate land across the river.

- If the Commission is going to stick with a percentage for defining minor, *a more reasonable number would be 10 percent*. While the County still objects to using a percentage of acres to define minor, 10 percent with no cumulative cap on acreage would be workable for the County.
- Eliminate procedural barriers to accepting applications – allow for cost reimbursement for processing an application; require a six month notice of intent to be filed with Commission staff; look to the Oregon Department of Land Conservation and Development process for guidance on reviewing applications.
- If the Commission cannot reach agreement on final policy choices for Urban Area Boundary Revisions, the section should be dropped from this periodic review and taken up during the next review. It would be better to defer policy making than adopt policy that is unfinished, unworkable in practice, and fails to balance the purposes of the Act.

Thank you for your consideration.

Very truly yours,



Chair Scott Hege  
Wasco County

cc: Governor Brown's Office  
DLCD  
Senator Merkley  
Congressman Walden  
Representative Bonham  
Senator Findlay  
Representative Smith