

**Testimony by Elaine Albrich
On behalf of Port of The Dalles
CRGC June 25, 2020**

Thank you for the opportunity to comment.

The National Scenic Area is about 293,000 acres.

- The GMAs make up approximately 50 percent of the area
- The SMA make up approximately 40 percent of the area
- And the urban areas are approximately 10 percent of the area

The urban areas total about 28,541 acres.

Under the Commission's proposal for urban area boundary revisions, if each of the 13 urban areas sought a revision and were able to satisfy the 4(f) approval criteria, about 170 acres could be added to the urban areas.

Dallesport, Hood River, North Bonneville, Stevenson, The Dalles, and White Salmon/Bingen would be limited to 20 acres total, forever. Cascade Locks, Home Valley, Lyle, Mosier, and Wishram would be limited to even less, forever.

- 170 acres amounts to a 0.6 percent increase in the total urban area acreage and would amount to a total of about 0.06 percent of land in NSA.

Breaking it down further,

- The 20 acres amounts to a 0.36 percent increase for The Dalles (5,436 acres), a .6 percent increase for White Salmon/Bingen and Stevenson (at 3,325 and 3153 respectively), and a 0.83 percent for Hood River (at 2,422).

These are ridiculously low numbers. And are absolute limits on growth.

These numbers do not ensure that an application is "minor" but rather that it is di minimis.

The Commission's definition cannot be what Congress meant when it used the word "minor" when granting the Commission authority to approve boundary revisions that complied with the 4(f) approval criteria.

For context,

- In 2019, the City of Nyssa added 281 acres, a small town of about 990 acres [which amounts to about 28 percent based on the 2018 data]

- In 2016, Bend added 2,380 acres a city around 20+ K acres [which is about 10-12 percent depending on the data you look at]
- In 2016, the City of Springfield added 781 a city about 10K+ acres [acres which is about 5 percent].

The reaction may be “well these communities are not in the National Scenic Area.”

These communities, however, also do not have to comply with the 4(f) criteria that provide the additional layer of protection to ensure that urban boundary revisions do not adversely impact the SNCRs.

Congress did not anticipate that there would be no impact or change over time. When it adopted the 4(f) criteria, Congress recognized that there would be some impact - criterion (D) expressly acknowledges that there can be reductions of agricultural land, forest land, or open space but that the reductions cannot be *significant*.

The Commission’s definition of “minor” is arbitrary and inconsistent with Congress’ intent.

I encourage the Commission to listen again to the presentation from Mr. Mike Salsgiver, the former staffer to Senator Mark Hatfield, who spoke at the November 12, 2019 meeting on the “History of the National Scenic Area” – there was a clear recognition that there must be balance between the two purposes of the Act and some ability for urban areas to grow over time.

The Gorge was not meant to be an urban recreational playground at the cost to people living and working it.

With respect to the other policy changes in the urban area boundary section, the Port proposed redline in its May comment letter. Simply put, the hard policy choices must be made in the Management Plan, not deferred till later.

Thank you for your time and consideration.