

## Gorge Commissioners' Proposed Amendments for the Draft Gorge 2020 Management Plan

Topic/Comment	Commissioner
<p><b>Note:</b> <i>Commissioner comments are in italics</i> . Draft Management Plan text is in <b>black</b>. Commissioner deletions are in <b>red strike-through</b>, Commissioner additions are in <b>blue</b>, and Draft Management Plan text that Commissioners moved is in <b>green</b>.</p>	
<b>Introduction</b>	
Page 10–11: <i>Replace all references deleted because they refer to the fact that the Scenic Area is populated by people. Particularly egregious is the removal of Senator Hatfield's comment in the Introduction. I certainly do not remember voting on such an item, nor instructing staff to do so. This language is important to frame how the Commission must balance the two purposes of the Act. To remove this is disrespectful to the man who was a key player in getting the Act passed.</i>	Nichols
Page 10–11: <i>Re-instate Senator Hatfield quote.</i>	Ericksen
Page 12, 14: <i>Change wording back to original, "The Act does not prohibit ..."</i>	Ericksen
Page 13: <i>Replace original wording in top of 2<sup>nd</sup> column re: "expand over time."</i>	Ericksen
<b>Scenic Resources</b>	
Page 36: OVERALL SCENIC PROVISIONS, GMA Guideline: 2. New buildings and expansion of existing development shall be compatible with the general scale of existing nearby development and Expansion of existing development shall comply with this guideline <del>to the maximum extent practicable</del> . Findings addressing this guideline shall include but are not limited to...	Blair
Page 36, Guideline 2(D): <i>Allow an exemption for compatibility analysis for buildings under 2,500 sq ft.</i>	DeKay
Page 36, Guideline 2(D): <i>Exemption from study area for safe harbor size, say under 2,500' and define "compatibility"; average, less than max, 75% of average...?</i>	Ericksen
Page 36, Guideline 2: New buildings and additions shall be compatible with the general exterior scale (height, dimensions and overall mass) of existing nearby development. Expansion of existing development shall comply with this guideline <del>to the maximum extent practicable</del> .	Liberty
Page 39, KEY VIEWING AREAS, GMA Policies 8: New production and/or development of mineral resources on sites visible in the foreground or middle-ground from key viewing areas may be permitted if fully screened from view from those key viewing areas. New production and/or development of mineral resources on sites visible in the background from key viewing areas <del>shall</del> may be permitted if visually subordinate to its setting as seen from those key viewing areas.	Blair
Page 39, 8. + 9: <i>Change "may" to "shall subject to conditions" (8 in two places)</i>	Ericksen

<p>Page 41, Guideline 4: The extent and type of conditions applied to various proposed developments to ensure visual subordination to its landscape setting shall be proportionate to its potential visual impacts as seen from key viewing areas. Conditions may include and shall be <del>prioritized in order of condition to utilize</del>: applied using the following priorities.</p>	<p>Liberty</p>
<p>A. Screening by topography <del>Siting</del> (location of development on the subject property, building orientation, and other elements)</p>	
<p>B. Retention of existing vegetation on the applicant's property.</p>	
<p>C. Design and building materials (color, reflectivity, size, shape, height, architectural and design details and other elements).</p>	
<p>D. New berms or other recontouring on the applicant's property, if they are consistent with other GMA provisions.</p>	
<p>E. New landscaping on the applicant's property.</p>	
<p>Page 41: KEY VIEWING AREAS, GMA Guidelines 5: If new landscaping is required to make a proposed development visually subordinate from key viewing areas, existing on-site vegetative screening and other visibility factors shall be analyzed to determine the extent of new landscaping, and the size of new trees needed to achieve the standard. Any vegetation planted pursuant to this guideline shall be sized to provide sufficient screening to make the development visually subordinate within five years or less from the commencement of construction. If after five years the vegetation has not achieved a size sufficient to screen the development, additional screening <del>may</del> shall be required by the local government to make the development visually subordinate.</p>	<p>Blair</p>
<p><i>Support staff language on the definition of skyline:</i> The line that represents the place at which a landform, such as a cliff, bluff or ridge, meets the sky, and is topographically visible as viewed from a specified vantage point (generally a key viewing area, for the purpose of the Management Plan). The skyline is formed where the surface of the earth meets the sky <del>except in naturally occurring, densely forested landscapes areas</del> with thick, unbroken tree cover, the skyline <del>may be is generally</del> formed by the top of the vegetative canopy. <del>In treeless areas or with more open tree cover, the skyline is formed by the surface of the ground.</del></p>	<p>DeKay</p>
<p>Page 42, Guideline 7: <i>Skyline variance: revert to original pre-draft language.</i></p>	<p>Kaufman</p>
<p>Page 42, <i>Retain variance language for the GMA.</i></p>	<p>DeKay</p>
<p>Page 42, Guideline 10: The exterior of buildings on lands seen from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity, unless the structure would be fully screened from all key viewing areas by existing topographic features. <i>[Add back pre-draft language in this sentence. ]</i></p>	<p>Kaufman</p>

Natural Resources	
Page 107, WATER RESOURCES, Goal 1: Achieve no <del>overall-net</del> loss of wetlands acreage and functions.	Blair
Page 107, Water Resources Goal 1: <i>No <u>net</u> loss should be the continuing standard</i>	Kaufman
Page 108, WATER RESOURCES, Policy 6: New uses shall be sited to avoid wetlands <b>and adverse effects to wetlands.</b> <del>to the greatest extent practicable. New uses that are not water dependent or water related may be allowed in wetlands when practicable alternatives do not exist.</del>	Blair
Firewise policies, wetlands buffers, and "no loss" of wetlands policies should be considered as part of the Climate Change Action Plan.	DeKay
Page 112, Approval Criteria for Other Review Uses in Water Resources <b>Amendment: REVERT BACK TO ORIGINAL</b> 1. The uses identified in Guideline 2 <del>1</del> under "Review Uses," above, may be allowed only if they meet all of the following criteria: <b>Note:</b> A change to Guideline 1 from the original Guideline 2 now subjects modifications to existing serviceable structures and minor water-related or water-dependent structures to the more stringent requirements for all other uses. The edit also suggests that those other uses are not subject to this section. In addition to requiring a costly mitigation plan, this would also require that these uses satisfy a public interest test. As proposed, even a modest home addition would need to demonstrate a public need in order to be considered.	Kaufman
Page 117, WATER RESOURCES Buffer Zones, 2B: Streams used by anadromous or resident fish (tributary fish habitat), special streams, intermittent streams that include year-round pools, and perennial streams: <del>100</del> 200 feet.	Blair
Recreation Resources	
Page 157: <i>Delete last sentence in 1st paragraph: Not part of the Act</i>	Ericksen
Page 168, PROTECTION OF RESOURCES, GMA Policies 6: Temporary closures and restrictions of recreation sites during critical risk periods shall be supported where adverse, <b>or potentially adverse</b> , effects on protected resources have been identified or demonstrated.	Blair
Page 169, Policy 7, Trails and Pathways: <i>Amend to:</i> "except for emergency operator-propelled vehicles, cycles or similar devices (such as electric assisted bicycles as defined by ORS 801.258), emergency services vehicles, authorized maintenance vehicles, and electric powered wheelchairs and scooters for persons with disabilities."	Mills
Page 169, GMA Policy 7: <i>Add ebikes and electric wheelchairs to excepted vehicles</i>	Ericksen

<p>Page 171, Coordination: <i>Retain all deletions:</i> 1. Coordinated, regional approaches to solving ongoing operational and management problems (such as emergency response, law enforcement, <del>and</del> coordinated fee/permit systems, and congestion, etc. ) shall be pursued in planning new recreation uses and for comprehensive plan updates and revisions, to the maximum extent practicable. Such efforts shall include exploring additional revenue sources to defray the costs of law enforcement and public safety services provided by local government service providers.</p>	<p>Liberty</p>
<p><b>Land Uses</b></p>	
<p><b>Agricultural Land</b></p>	
<p>Page 198, LARGE-SCALE AND SMALL-SCALE AGRICULTURE, Land Use Policy 3 <del>3. Agricultural land shall be protected from conflicts by limiting the number, size, proximity, and scale of conflicting uses on nearby lands.</del> 3. Agricultural land shall be protected from conflicts by limiting the number, size, proximity, and scale of conflicting uses on nearby lands. <del>Agricultural land shall be protected from conversion to residential land by establishing minimum lot sizes for the creation of new parcels that are adequate to maintain existing agricultural operations, and by specifying the uses that may occur and the conditions of approval</del></p>	<p>Blair</p>
<p>Page 199, Policies 6.B: <i>AMEND to include "Cideries" along with lawful wineries.</i></p>	<p>Mills</p>
<p>Page 199, Policies 6 and 7: <i>Reword these policies to be inclusive of ag products grown on property beyond wines (such as apples for cideries). Support language below for Economic Development chapter (page 391):</i>  GMA Policy 6.E  <i>Replace draft language 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.</i>  GMA Policy 6.F  <i>Replace draft language 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.</i></p>	<p>DeKay</p>
<p>Page 199, Policy 6(B): <i>Add back in: "Produce or product sales"</i></p>	<p>Ericksen</p>
<p>Page 199, Policy 7: <i>Add: "Produce or product sales"</i></p>	<p>Ericksen</p>
<p>Page 200, Large-Scale and Small-Scale Agriculture Review Uses 1.A: New cultivation, subject to compliance with guidelines for the protection of cultural resources (Part I, Chapter 2: Cultural Resources) and natural resources (Part I, Chapter 4: Natural Resources), and upon demonstration that the landowner has sufficient water to support the use. <i>COMMENT/QUESTION - How is 'sufficient water' standard going to be determined? Difficult standard to enforce.</i></p>	<p>Kaufman</p>

Page 202, LARGE-SCALE AND SMALL-SCALE AGRICULTURE, Review Uses, 1H(3)(d): Income capability. The farm or ranch, and all its constituent parcels, must be capable of producing at least \$40,000 in gross annual income in 1991 dollars. This gross annual income amount shall be indexed for inflation on an annual basis using Consumer Price Index data from the U.S. Bureau of Labor Statistics, and the new adjusted amount for each calendar year (calculated from 1991 dollars) will be posted on the Gorge Commission website by January 15 of each year. This determination can be made using the following formula:	Blair
Page 205, GMA Guidelines, Review Uses 2.E. <i>to read</i> "Wine and cider sales and tasting rooms in conjunction with onsite winery or cidery."	Nichols
<i>Add new provision:</i> "Residential and agricultural landowners are required to familiarize themselves with their respective state FIREWISE standards and adhere to those FIREWISE standards while complying with all Scenic Resource requirements."	Wainwright
<b>Forest Land</b>	
Page 224, FOREST LAND, Land Use Policy 6: <del>Dwellings shall be allowed in conjunction with agriculture on lands designated Commercial Forest Land.</del>	Blair
Page 224, FOREST LAND, Land Use Policy 7: <del>New residences shall be allowed on lands designated Large Woodland if they are shown to contribute substantially to effective and efficient growing, propagation, and harvesting of forest tree species.</del>	Blair
Page 224, FOREST LAND, Land Use Policy 8 (224 DMP): Single-family dwellings shall be allowed in areas designated Small Woodland when: A. A dwelling is shown to be in conjunction with the growing, propagation, and harvesting of forest tree species, <del>or and it B. A dwelling</del> is on a parcel shown not to be eligible for enrollment in the subject state's forest assessment program.	Blair
Page 229, Review Uses E. <i>Add same</i> : Produce or product sales	Ericksen
Page 231, AMEND to: G. "Roofs of structures shall be constructed of fire-resistant materials such as <del>[metal]</del> stone-coated steel or similar, fiberglass, or asphalt shingle or tile. Roof materials such as cedar shake and shingle should shall not be used."	Mills
<b>Residential</b>	
Page 266: (H) Delete everything after "playgrounds" or cite current standards. Cited standard no longer exists	Ericksen
<i>Add new provision:</i> "Residential and agricultural landowners are required to familiarize themselves with their respective state FIREWISE standards and adhere to those FIREWISE standards while complying with all Scenic Resource requirements."	Wainwright

<b>Commercial Land</b>	
Page 273, <i>Economic Development Chapter GMA Objectives 1. Remove proposed use of the word 'limited':</i> Protect and support the economy of the Columbia River Gorge by allowing <del>limited</del> new commercial uses outside of Urban Areas where they will not adversely affect scenic, cultural, natural, or recreation resources.	Kaufman
<b>General Land Use</b>	
Pages 310-321, AMEND to Expand "Outright Allowed" and "Expedited Review:	Mills
Page 318, Expedited Development Review Process: <i>YES to all staff questions; Also, primary residential buildings up to 2,500 sq ft that are on parcels that already have approved landscape development should be allowed to go through the expedited development review process.</i>	Kaufman
Page 344, Guideline 2(A): Add <b>"and a copy of the previous year's Schedule F (Farm Profit and Loss) tax statement"</b>	Ericksen
Page 344, Part II, Chapter 7 Temporary Use Hardship Dwellings: <b>Correction:</b> <i>"dwelling structure" is not term in glossary - replace with "dwelling unit" is defined (p. 472), additional definition might need to include recreational vehicle or tiny home</i>	Kaufman
Page 346, Home Occupations: GMA/SMA Guidelines: <b>REVERT TO ORIGINAL LANGUAGE (allow incidental sales)</b> G. No retail sales may occur on the premises, except incidental sales at lodging establishments authorized in this chapter.	Kaufman
Page 347, Overnight Accommodation GMA Guideline 1: <i>Why is 2-acre residential not included?</i>	Ericksen
Page 347, 1.A. Overnight Accommodations, DELETE: 1.A. <del>"The owner of the subject parcel may rent the dwelling for up to 90 room nights per year."</del>	Mills
Page 347, Overnight Accommodations Guideline 1.A: The owner of the subject parcel may rent <b>up to 3 rooms for a maximum of 14 consecutive days.</b> <del>the dwelling for up to 90 room nights per year.</del>	Kaufman
Page 347, Overnight Accommodation Guideline 1.D: The dwelling must be the <b>permanent</b> residence... <i>Would "primary" be better, is permanent defined?</i>	Ericksen
Page 347, Overnight Accommodation Guideline 1.D: The dwelling must be the permanent residence of the owner and <del>occupied by</del> the owner, a local manager or contact person should be available at all times during the rental.	Kaufman
Page 347, OVERNIGHT ACCOMMODATIONS: F. The overnight accommodation may employ up to <del>three</del> <b>one full time equivalent</b> employees other than the residents of the dwelling.	Blair
Page 347, 1.G. AMEND: "Land use approvals for overnight accommodations may be revoked for violations of these provisions. [DELETE: "Land use approvals for overnight accommodations shall be <del>valid for no more than two years.</del> ..."]	Mills
Page 347, Overnight Accommodations Guideline 1: <b>Strike 1.G and 1.H</b>	Kaufman
<i>Bed and Breakfast Inns should be retained as a land use</i>	Kaufman

Add back B&B Inns. Do not limit room nights for overnight accommodations. Primary residence but owners need not be on the property.	DeKay
GMA Guidelines, Review Uses 2.D. to read "Wineries and cideries, in conjunction with onsite viticulture and apple production, upon a showing that processing of wine or cider is from grapes or apples grown on the subject farm or in the local region."	Nichols
GMA Policies 6 & 7 Commercial Uses on Large-Scale and Small Scale Agriculture Land Use Designations: <i>Strike "Wine" and "winery" from these provisions</i>	Kaufman
Outright: Forest fuel treatment/reduction activities; Accessory Buildings 200 Sq.Ft. or less; Co-location of antennas on existing wireless transmission tower within existing tower height.	Ericksen
Expedited: Accessory buildings and structures up to 1,500 Sq.Ft or less within a recognized "developed landscape setting"; "In-Kind" replacement buildings for structures destroyed or damaged by a disaster; highway projects occurring within recognized road prism and conforming to specific standards, such as the I-84 Corridor Strategy Guidelines .	Ericksen
Page 355, <i>Modify Guideline J to allow full review of NEW applications for commercial events but expedited review for renewal of permits.</i>	DeKay
Page 355, Commercial Events Guideline J: Land use approvals for commercial events shall not be valid for more than two years. Landowners must reapply for the use after a land use approval expires, <u>and may use the expedited review process.</u>	Kaufman
Page 355, Commercial Events Guideline K: A yearly report shall be prepared <del>submitted to the reviewing agency by January 31st</del> reporting on the events held the previous year. Commercial Event operators must maintain reports and - <del>This report</del> records <del>that</del> shall include the number of events held, how many people were in attendance, and copies of catering contracts or other vendors used to verify. <del>Records must be retained for _____ (7 years? Need to ask staff for appropriate length of retention.)</del>	Kaufman
<i>Modify Guideline K to allow operators to keep records, to be submitted at renewal, and remove Guideline L.</i>	DeKay
Page 355, Commercial Events Guidelines L: <del>Permits will may not be renewed if there have been past violations, including failure to file-maintain records, that have not been rectified.</del>	Kaufman
Page 356, Commercial Events: Guideline 2(L): <i>Reword – If there have been past violations, the renewal may be denied unless assurances are provided that violations will not be repeated, i.e. remedial plan of action. Failure to file, or severe or habitual violations may result in a denial.</i>	Ericksen
Page 357, GMA/SMA Policies 4: <i>Clarify who reviews private projects on Federal land. As stated, not clear.</i>	Ericksen

Page 373, Renewable Energy Production, Amendment: 2. Solar and wind power generation that is accessory to a primary structure or allowed use on the parcel is not considered an industrial use and may be permitted provided that that the capacity for power generation is limited to the expected annual electrical power need of the structure or use on the property and the generating equipment is located on the same parcel as the use. The generating equipment may serve only the parcel on which it is located. Sale of power back to the electrical grid is permitted <del>provided that it is an occasional event, not ongoing over the course of the year.</del>	Kaufman
<b>NEW DISCUSSION REQUESTED:</b> <i>The option to have an <b>Accessory Dwelling Unit</b> option does not appear to my knowledge in the Draft Management Plan but is essential to supporting the Gorge economy and families in the region. This is a vital conversation to have at this time. I have consulted with Jeff and he said that given the authorities of the bi-state compact, the CRGC has the power to develop land use planning to accommodate ADUs throughout the NSA. <b>Insert new GMA Policy Page 344 : Accessory Dwelling Units: Accessory dwelling units (ADUs) may be allowed, subject to guidelines to minimize adverse effects on scenic, cultural, natural and recreation resources. (more details on the detailed policy to come)</b></i>	Kaufman
<b>Climate Change</b>	
Page 378, 2nd Col, 2nd P: <i>Change "compact" to "distinct" or "distinctly defined"</i>	Ericksen
Page 380: <i>Delete automatic default after 1 year, buffer needs to be set with advice of experts and knowledge of the impacts and avoid unintended, unnecessary impacts.</i>	Ericksen
Page 380: <i>Delete the provision that would automatically expand stream buffers in the GMA (to 200 feet) if the Commission does not pass a climate change program in a year's time. This would bypass due process and not allow for public comment.</i>	Nichols
Page 380: <b>DELETE:</b> <i>The proposal to require 200 foot buffer if the revisions (evaluation) are not completed within one year. [Management Plan, the Gorge Commission will implement the following interim stream buffer protection standard: apply the existing SMA buffer width (200 feet) to cold water refuge streams within the GMA. Streams affected by this policy change include the Sandy River, Wind River, Little White Salmon River, White Salmon River, Hood River, Klickitat River, Fifteenmile Creek, and Deschutes River.]</i>	Mills & Kaufman
Page 380: <i>Modify stream buffer policy: <del>If the Gorge Commission has not completed its evaluation of appropriate stream buffer protections by one year after adoption of revisions to the Management Plan, the Gorge Commission will implement the following interim stream buffer protection standard: a</del>Apply the existing SMA buffer width (200 feet) to <b>these EPA priority</b> cold water refuge streams within the GMA:<del>Streams affected by this policy change include the</del> Sandy River, Wind River, Little White Salmon River, White Salmon River, Hood River, Klickitat River, <del>Fifteenmile Creek,</del> and the Deschutes River.</i>	Wainwright
200-foot buffers and forest land protection strategies should be evaluated and then part of the Climate Change Action Plan to allow for consultation with 4 Columbia River Treaty Tribes, landowners and agencies.	DeKay



Staff Report, pages 10–11: <i>If a 200' buffer width for the seven EPA-identified priority CWR streams is supported by the information the Commission currently has, it should expand the buffers at this time. The one-year delay will have no implementation effect because the expected timeline for when counties will have updated ordinances will be at least a year following Plan adoption. The Commission should clarify its reasoning for the one-year delay.</i>	Staff
Page 380: <i>If we leave 1 yr. limit, then remove Fifteenmile from cold water refuge streams. It definitely needs study before adoption of buffer.</i>	Ericksen
Page 380: <i>Include the six counties in the consultation process along with Tribes and Forest Service.</i>	Ericksen
Page 381 Reword: <i>“Forest Resources – protecting forested lands for timber production which provides for carbon storage. This includes....”, delete “forest practices policies.” No jurisdiction to establish forest practices rules [544o Sec.17b.]</i>	Ericksen
Page 381: <i>Next paragraph – Delete “the Management Plan should require full mitigation.” [Under Forest Resources]</i>	Ericksen
Page 381: <i>Strike the following language from GMA Policy 1: The Gorge Commission shall prohibit conversion of forest lands to any use other than agriculture, recreation, and open space. For conversion to agriculture or recreation, the Management Plan should require full mitigation.</i>	Kaufman
Page 382: 5. "...gas emissions, <b>enhance protect</b> forests for timber production increasing carbon storage..."	Ericksen
Page 382: 5. Second sentence: The Gorge Commission will <b>“work with partners such as Mid-Columbia Economic Development District, to develop...”</b>	Ericksen
<b>Part IV - Administration</b>	
Part IV Administration, Policies, new #6: <b>“At least 20 days but not more than 40 days before the date of the first hearing to amend the Columbia River Gorge Management Plan or any element thereof, the Gorge Commission shall cause a written individual notice of potential land use change to be mailed to each owner whose property would be subject to new restrictions if the change(s) were to become effective.”</b>	Nichols
Page 412, MONITORING IMPLEMENTATION OF THE MANAGEMENT PLAN, Policy 1: <b>Section 15(a)(1) of the National Scenic Area Act is a mandatory duty of the Gorge Commission.</b> The Gorge Commission shall work with the Forest Service, the counties, the four Columbia River treaty fishing tribes, local governments, and state and federal agencies to establish a program for monitoring and evaluating the implementation of the National Scenic Area Act and Management Plan, <b>and shall take such actions as it determines are necessary to ensure compliance with the Act and the Plan.</b>	Blair
<b>Economic Development</b>	
Page 391, GMA Policy 6(E) and (F): <i>Add Produce and product sales</i>	Ericksen
Staff report at page 25: Page 392, Policy 9 - Public comments suggested retaining the two deleted bullet points regarding ports	Staff

<p><i>Economic Development Chapter should reflect changes to general beverage industry: 6.E . <del>Wineries and farm-produce stands Beverage</del> Wine sales, tasting rooms, in conjunction with a lawful winery agricultural business, on lands designated Large-Scale or Small-Scale Agriculture, Commercial Forest Land, or Large or Small Woodland</i></p>	<p>Kaufman</p>
<p>F. Commercial events in all GMA designations except Open Space and Agriculture Special, in conjunction with a lawful winery, wine sales/<del>or</del> tasting room, bed and breakfast inn, commercial use, or dwelling listed in the National Register of Historic Places.</p>	<p>Kaufman</p>

<b>Urban Area Boundaries</b>	
<i>Rescind changes added to Urban Area Boundary expansion section</i>	Nichols
Page 414: REVISION OF URBAN AREA BOUNDARIES, Title: <b>MINOR</b> REVISION OF URBAN AREA BOUNDARIES	Blair
<i>Reinstate the first sentence [removing 'towns'] : "Congress designated 13 cities and towns communities as "Urban Areas": Cascade Locks, Hood River, Mosier, and The Dalles, Oregon; and Bingen, Carson, Dallesport, Home Valley, Lyle, North Bonneville, Stevenson, White Salmon, and Wishram, Washington."</i>	Kaufman
Page 415, 4th line - "In doing so, the Act provides protection for the scenic, natural, cultural, and recreation resources by providing adequate land in Urban Areas for development to occur to avoid sprawling into the GMA. Expansion into agricultural lands, forest lands, and open spaces may be permitted as long as the result does not create a significant reduction of these protected areas."	Ericksen
Page 415, Policy 1 – <i>Seems like first "based on" issue is a determination of whether the application, upon review, is indeed fulfilling the purposes; but then the second two seem to be stipulations on when an application will even be accepted for review. Chronologically, this doesn't really make sense. Maybe reverse the order or make two policies...</i>	Ericksen
Page 415, Policy 3 – <i>Change "can only" to "has authority to"</i>	Ericksen
Page 415, Policy 4 – <i>Change to: The Gorge Commission shall seek funding in its biennial budget to review any Urban Area boundary revision application after receiving notice of a county's intent to submit an application. The Commission may seek and use other sources of funding to supplement the costs of a review.</i>	Ericksen
Page 415, REVISION OF URBAN AREA BOUNDARIES, Policy 4: Counties shall <del>inform</del> <b>provide written notice to</b> the Gorge Commission of their intent to seek an Urban Area boundary revision <b>no later than 90 days before the earliest date that the Gorge Commission's budget is required to be submitted to either the Oregon or Washington governor. The notice shall state whether the minor revision is being requested for long-range urban population growth or specific economic needs (for example, industrial, commercial, or retail needs).</b> <del>in time for the Gorge Commission to seek sufficient funding in its biennial budget for reviewing the boundary revision application.</del>	Blair

Page 415, REVISION OF URBAN AREA BOUNDARIES, Policy 4: <del>At the beginning of each biennial budget, the Gorge Commission will determine whether its funding is sufficient to allow it to analyze one or more Urban Area boundary adjustment applications during that biennium and communicate its determination to the counties. Pursuant to article I.e. of the Columbia River Gorge Compact, the Gorge Commission may also receive other funds to review Urban Area boundaries.</del> If the Gorge Commission does not receive sufficient funding from a state to fully pay for its costs to review an Urban Area revision application, the Commission may proceed to review the application if the county agrees to pay any costs incurred by the Commission in its review that are not paid by the state. Whether provided by the state or county, the Commission shall only review the application if all of its review costs, including the reasonable costs of hiring a qualified, independent expert to review the projections, trends, land availability, and other data contained in the application, will be paid or reimbursed by the county and/or state.	Blair
<i>Page 415 Policy 4 A specific time period needs to be in place</i>	Kaufman
Page 415, Policy 5 – <i>Delete first sentence</i>	Ericksen
Page 415, Policy 6 – The Gorge.....Urban Area boundaries “when a similar request is being applied for with the respective State land use authority.” Or, adopt DLCD recommendation for Policy 6 on Page 2 of 4 of DLCD letter of June 30.	Ericksen
<i>This may not be relevant - more clarification is needed as to how this would apply to all 6 counties in NSA.</i>	Kaufman
Page 416, Policy 8 – <i>Change to: “...pursuant to sections 4(f)(2)(B) and (D) of the...case-by-case basis.” Delete the rest.</i>	Ericksen
Page 416 Policy 8 A-- keep 20 acres or 1% is minor. Remove 8 B as the “not minor” language. Page 416 Policy 10B Consider the regional approach for demonstrating need, but not require it. Page 417 Policy 11 Remove policy for enforceable conditions of approval and include in rule making instead.	DeKay
Page 416, Policy 8.A.(i), <i>AMEND to: “Based on the desire for no net change in total urban area, allow for consideration one Gorge area to acquire one Gorge Community to acquire acreage from another.”</i>	Mills
Page 416. <i>AMEND to: 8.B. An urban area boundary revision that cumulatively, over time, expands the size of an Urban Area by more than <del>20</del> 50 acres or <del>1%</del> 2%, whichever is less, is not minor.</i>	Mills
<i>A.ii. Revisit the definition of minor; strike 8.B.</i>	Kaufman
Page 416, REVISION OF URBAN AREA BOUNDARIES, Policy 9: Land formerly in an Urban Area that is transferred into the General Management Area should enhance the General Management Area’s scenic, natural, cultural or recreational resources, and shall not contain development or urban facilities that is are inconsistent with the purposes and standards in sections 3 and 6 of the Act or the Management Plan.	Blair
Page 416, Policy 10 – <i>Combine 10 and 10(A) into one: “...case-by-case and as provided in Oregon’s and Washington’s processes ...” Delete B, C, D, and E. (There is no standard for D.)</i>	Ericksen

Page 416, Policy 10.A <i>Comment: Use of the Oregon Administrative Rule 660-038 should be adjusted to reflect the specific language from the rule and not the reference to the rule number itself, which could be changed over time.</i>	Kaufman
Page 416, REVISION OF URBAN AREA BOUNDARIES, Policy 10B: <del>Urban Areas that adjoin or are near to one of the three Columbia River bridges in the National Scenic Area must, at a minimum, consider land supply and need of the other</del> any Urban Areas that adjoin or are near to that bridge and other nearby Urban Areas with a boundary within twenty-two miles of the closest boundary of the Urban Area that is seeking a revision.	Blair
Page 416, Policy 10.B. <i>AMEND (ADD) to:</i> "Urban Areas that adjoin or are near to one of the three Columbia River bridges in the National Scenic Area must, at a minimum, consider land supply and need of the other Urban Areas that adjoin or are near to that bridge and other nearby Urban Areas, though this does not require incurring the cost of financial analysis of neighboring jurisdictions."	Mills
Page 416, Policy 10.B. <i>As part of the Annual Workflow of the CRGC staff, investigate how the CRGC can support regional economic development with regional partners.</i> Strike the following language: <del>Urban Areas that adjoin or are near to one of the three Columbia River Bridges in the National Scenic Area must, at a minimum, consider land supply and need of the other Urban Areas that adjoin or are near that bridge or other nearby Urban Areas.</del> Substitute "The Gorge Commission shall participate in regional partnerships that encourage regional planning efforts in Urban Areas to assist in minimizing requests for Urban Area Boundary Revisions."	Kaufman
Page 416, Policy 10.C Proposed Replacement language: C. As part of its review of a proposed Urban Area Boundary revision, the Commission will determine and analyze the market area which the proposed demonstrated need will serve and the likely residence of the employees or contractors of any enterprise, service or organization fulfilling the need. This information will inform the Commission's consideration of the proposed revisions impacts on urban land efficiency, climate change, social equity, urban economic vitality and impacts on scenic, natural, cultural and recreation resources in the Gorge.	Liberty
Page 417, Policy 10.D When addressing demonstrated need, the Commission shall consider the <del>relevant</del> relative benefits and burdens of the proposed revision to moderate and low income communities and racial and ethnic minorities.	Liberty
Page 417, Policy 11 – <i>Delete, unenforceable per intent of the Act</i>	Ericksen
Page 417, Policy 11 <i>Replace the language in draft Policy 11 with the following:</i> In deciding whether or not to approve an adjust an urban area boundary the Commission shall determine whether; (a) the implementing measures by the local government that will govern the expanded urban area; and (b) the Commission's conditions of approval, as agreed to by the governing local government, are sufficient to guarantee that the expansion area will be used to satisfy the demonstrable need under 16 USC Section 544.b.(f)(2) which was the basis for the application . If they are not sufficient, the Commission shall deny the application as failing to meet the requirements of Section 544.b.(f)(2).	Liberty

Page 417, REVISION OF URBAN AREA BOUNDARIES, Policy 11: The Gorge Commission <del>may</del> shall require the local government to adopt enforceable conditions of approval to ensure land added to an Urban Area is used only to satisfy the demonstrated needs that were the basis for adjustment.	Blair
Page 417, Policy 12 – <i>Change to:</i> Compliance with Sec. 4(f)(2)(B), consistency with the standards and purposes in the Act may be satisfied by direct findings demonstrating that the proposed revision is consistent with the standards and purposes when considered collectively. Findings of compliance with each standard are not required to demonstrate compliance with section 4(f)(2)(B).	Ericksen
Page 417, Policy 13 – <i>After “...existing Urban Areas” add “may be satisfied by providing information of the proposed zoning requirements, development standards, and provision of public services, such as roads and utilities, for the expanded area to be finalized and implemented upon the final approval of the Urban Area boundary revision.” Delete the rest.</i>	Ericksen
Page 417, Policy 14 – <i>Change to:</i> “Compliance with section 4(f)(2)(D), demonstrating that revisions to boundaries of an Urban Area shall not result in the significant reduction of agricultural lands, forest lands, or open spaces may be satisfied by demonstrating that the agricultural, forest, or open space removed from the General Management Area has low resource value, is under utilized, lacks significant resources protected by 544a(1), or has qualities or characteristics that are better suited for urban area uses.” Delete the rest.	Ericksen
<i>General UAB Comment: Without these revisions, the Urban Area Revision section does not follow either the intent or the specific wording of the Act. As we heard from Mike Salsgiver, Sen. Mark Hatfield’s view was that “Oregon has a very well-defined process, it (boundary revision) should follow that process. It’s not up to the federal government to decide how or whether a growth boundary should be adjusted or not.” The process he refers to is the 20 year growth projection for long range planning purposes. The Act specifically provides for urban boundary revision to “accommodate long range population growth requirements or economic needs...” Although well intentioned, the limits and conditions contained in the Draft Revisions are completely contrary to the wording in the Act and the expectations of one of the chief sponsors of the original National Scenic Area Act, the Honorable Senator Mark Hatfield</i>	Ericksen
<b>Equity</b>	
<i>Address it in the annual work plan, outside of plan review.</i>	DeKay

<b>Definitions</b>	
<p>Staff Report at 33–34, Definition of "Skyline" Page 485 - This was a topic of a recent appeal and another recent land use application. Staff have recommended a further clarification of the definition: The line that represents the place at which a landform, such as a cliff, bluff or ridge, meets the sky, <b>and is topographically visible as viewed</b> from a specified vantage point (generally a key viewing area, for the purpose of the Management Plan). <b>The skyline is formed where the surface of the earth meets the sky except in naturally occurring, densely forested landscapes areas</b> with thick, unbroken tree cover, the skyline <b>may be is generally</b> formed by the top of the vegetative canopy. <del>In treeless areas or with more open tree cover, the skyline is formed by the surface of the ground.</del></p>	Staff
<p><i>Revert to original pre-draft definition of skyline</i></p>	Kaufman
<p><i>Page 488, Revise definition:</i> Visually subordinate: One of the two scenic standards applicable in the National Scenic Area. A description of the relative visibility of a development, structure or use where that development, structure or use does not noticeably contrast with the surrounding defining landscape setting characteristics, as viewed from a specified vantage point (generally a key viewing area, for the Management Plan), and the setting appears only slightly altered (distinctive characteristics of that setting remain dominant). As opposed to development, structures or uses that are fully screened, structures that are visually subordinate may be partially visible <del>but would be difficult to discern to the common viewer.</del> <b>They are not visually dominant in relation to their surroundings.</b> Visually subordinate development, structures, or uses as well as forest practices in the SMA shall repeat form, line, color, or texture common to the natural landscape, while changes in their qualities of scale, proportion, intensity, direction, pattern, etc., shall not dominate the natural landscape setting.</p>	Kaufman