**Attachment E**

**TO:** Columbia River Gorge Commission

**FROM:** Krystyna U. Wolniakowski, Executive Director
Casey Gatz, Land Management Planner, Forest Service

**DATE:** October 13, 2020

**SUBJECT:** Gorge 2020 Management Plan: Public Comment Spreadsheet

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The purpose for presenting this updated public comment spreadsheet is to share with the Commission and the public how comments received between June 1, 2020 through September 8, 2020, were addressed in both the 8/27/2020 version of the Draft Management Plan and amendments approved at the September 8, 2020 Commission meeting. The comments are organized by topic area in alphabetical order, followed by "Other" which includes topics on Cultural Resource chapters, Introduction, and other sections of the Draft Management Plan. Comments received between July 1, 2020 and September 8, 2020 are included at the end of this spreadsheet.

| Title in Chart | Topic |
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| Climate | Climate Change |
| Econ | Economic Vitality |
| Equity | Diversity, Equity, and Inclusion |
| Land Use | Land Uses |
| NR | Natural Resources |
| Rec | Recreation Resources |
| Public Comment Process | Public Comment Process |
| Scenic | Scenic Resources |
| UAB | Urban Area Boundaries |
| Other | Introduction, Cultural Resources, and Other Sections of the Management Plan |
| 9/8/20 Draft MP | Public Comments received through 9/8/20 on 8/27/2020 version of the Draft Management Plan |

| | Page | Topic | Comment | Response |
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| 1 | | Climate | [Comment on May 26 Staff Report: Framework for Climate Action Plan] We strongly feel that the full key issues on page 3 of the Draft Climate Change Action Plan Framework should include a separate key issue and line item for Transportation in addition to Natural Resources, Land Uses/Permitting, Recreation, and Cultural Resources. | The Gorge Commission recognizes transportation as a climate change planning topic and that numerous agencies and organizations are currently working on this issue in the National Scenic Area. The Draft Management Plan incorporates "Transportation" as a planning topic under GMA Policy 1 to develop and adopt a Climate Change Action Plan. In addition, GMA Policy 5 directs the Gorge Commission to "work with regional partners engaged in sustainable transportation planning to convene regional discussions and coordinate strategies on alternatives to automobile transit to achieve multiple objectives under the Act and to reduce greenhouse gas emissions." The nature and extent of the Gorge Commission's engagement on transportation will be explored in more detail when developing the Climate Change Action Plan following adoption of the Draft Management Plan. This letter provides comments on the CRGC Staff Report from May 25, 2020 that describes Commissioner feedback on draft strategies and actions that may be incorporated in climate change action planning. The Gorge Commission will review the transportation recommendations in this letter in development of the Climate Change Action Plan. |
| 2 | | Climate | Both the adaptation management of risks and mitigation actions by use of Transportation Management tools to protect the Gorge assets is a huge endeavor which requires Leadership beyond the individual stakeholders wrestling within their own sovereigns. The Gorge Commission and this redeployment of the Columbia River National Scenic Area Management Plan is just that: a place to bring together a unified Gorge-Wide Transportation Plan vision within the Climate Change umbrella. This potential Plan could govern the pillars of Safety, Asset Management/Resource Protection, Visitor Experience, and Transportation Finance. This does not mean the Commission to take on the day to day management of a Transportation Management Plan but our region needs that peregrine view of land use to create a table for all parties to convene a common purpose for Transportation integration throughout the Gorge. | See response 1 above. |

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| **3** | | **Climate** | [Comments on CRGC May 26, 2020 Staff Report: Framework for Climate Action Plan] Bring together a policy stakeholder meeting to set common goals for a Gorge Wide Transportation Management Association and Plan. Two major endeavors of Transportation are Access for communities to have a viable transit system that knits people together and simply reduce congestion due the increase recreational use of the HCRH. Consider the congestion mitigation and safety aspects of the Multnomah lodge tourniquet on Historic Columbia River Highway (HCRH) a top priority to reduce pollution. Insure access for all emergency, enforcement, and all layers of management partners along the HCRH. Recognize that the expected population growth of 35% over the next decades require Transportation needs that are not dependent on a single car centric approach. | See 1. |
| **4** | | **Climate** | [Comments on CRGC May 26, 2020 Staff Report: Framework for Climate Action Plan] Create a Table to integrate Transit as a solution for 1) Reducing pollution, 2) Increasing safety for vehicles, pedestrians, bicycles, hikers at trail heads intersecting with highways, 3) Providing employee access to employment where increased housing costs may have priced them out, and 4) Creating a continuity for Gorge Transit to connect to regional, national, and international travel resources. 5) Designing a financial system of payment methods of Transit for Gorge residents and visitors that dovetail with the larger regional methods. (Continuity of fee methods assists the user in paying for parking, reservations, and potential needs for maintenance of services.) | See 1. |
| **5** | | **Climate** | In regards to climate change, please strengthen policies for climate change adaptation and mitigation, including a one-year timeline for adopting a Climate Action Plan and protecting Gorge resources from impending climate changes. | GMA Provisions, Framework for Action: Climate Change Adaptation and Mitigation, states that "A foundational component of this framework is a Climate Change Action Plan with a target completion date..." During the May 12, 2020 CRGC meeting, Commissioners indicated support for a one-year target completion date as a goal to guide staff and Gorge Commission work planning, and did not recommend including a completion deadline within the Draft Management Plan. |
| **6** | | **Climate** | Please update the Management Plan to include a solid climate action plan, with specific measures that follow best available science. Please include protections for wildlife habitat, and prevent urban sprawl. As you know, scenic resources can be degraded over time, due to cumulative and irreversible impacts from climate change. | In the Climate Change Chapter, GMA Policy 1 directs the Gorge Commission to develop and adopt a Climate Change Action Plan addressing various topics including streams and riparian areas, forest resources, Priority Habitats, invasive species, wildfire, climate change action priorities of the four Columbia River treaty tribes, agricultural lands, and transportation. |

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| **7** | | **Climate** | The Management Plan's policies and guidelines does not go nearly far enough in addressing climate change. The proposed future development of a climate actin plan is insufficient. Climate adaptation and mitigation policies are necessary now and ample information is available from which to quickly adopt temporary policies even as you work on a more complete action plan. You should also add a target date (one year) for completion of the action plan (Policy 1, Page 380). You should add 200 foot protective buffers on each side of fish-bearing streams (page 380) as a temporary measure until the climate action plan is completed. You should add a new policy (Page 381 re: Fossil fuel infrastructure) to limit the development and transportation of fossil fuels within the Management Area. You should expand protections for Columbia River wetlands, ponds, lakes, and wildlife habitat (Page 381). This should include prohibiting destruction of wetlands and improved protections for Western Pond Turtle nesting/rearing habitat. In light of the risk of wildfire, you should prioritize (Page 381) policies to prohibit new forest dwellings on productive forest land and limit new dwellings to Small Woodland zones on parcels that are not eligible for state forest tax assessment programs. | See 5, 6, 12, 19, 88, and 90. |
| **8** | | **Climate** | I am delighted that you are now planning to develop a climate action plan. This needs to be done with much urgency. Most important in pursuing this plan is the need to ensure accountability to clearly defined goals. While any number of goals may be defined several of the most important ones need to be centered on protecting our salmon and their habitats. | Goal identification will be part of the climate change action planning process following adoption of the revised Management Plan. GMA Policy 1 includes streams and riparian areas, and specifically a 200-foot buffer for EPA Cold Water Refuge streams in the GMA to protect species such as salmon. |
| **9** | | **Climate** | There appears to be a "climate change" chapter that is being added. While many would agree that we should be good stewards of this world, I don't understand why the Commission takes on yet another task, while they seem to be having a hard time dealing with what is already on the table. | Climate change affects all resources that the Gorge Commission manages and therefore needs to be addressed in the Management Plan. Following adoption of the Draft Management Plan, staff will develop a work plan to integrate climate change action planning with other Commission priorities, in particular working with counties to adopt changes in local ordinances. The Gorge Commission recognizes that significant climate change planning work has already been done in the region and will draw from existing resources whenever possible. |
| **10** | | **Climate** | It's very important to consider climate change in the plan along with protection of natural resources. | A new climate change chapter is included in the Draft Management Plan (Part III: Action Plan, Chapter 1: Climate Change). |

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| **11** | | **Climate** | I'm glad to see the new "Climate Change" chapter in the Management Plan (MP), but there's no actual climate action plan. It refers to developing such a plan in the future, but THE NEED IS NOW. We need to have specific policies in place for climate adaptation and mitigation, and a specific timeline. A one-year deadline for adopting a climate action plan is demanding but doable. A looser, more nonspecific approach is neither practical or ethical given the pressing should-have-done-it-yesterday nature of climate change. | See 5. |
| **12** | | **Climate** | The entire Gorge is defined by water. We need robust protection for the water itself (water quality and quantity), in all its upstream forms (streams, wetlands, ponds, etc.). And we need protection of habitat surrounding the water, especially for the many species that are currently at risk. 12 stocks of salmon are listed as threatened or endangered on the federal and state endangered species lists. The Commission should immediately institute a 200-foot protective buffer on each side of all fish-bearing streams in the National Scenic Area, as has been the standard for nearly 30 years in the Special Management Areas (SMAs). That can and should be done pending completion of the Climate Change Action Plan. | During its August 2020 meeting, the Gorge Commission approved a policy requiring a 200-foot buffer for 7 Environmental Protection Agency (EPA) priority cold water refuge streams (CWR) within the GMA (included in Natural Resources Chapter with reference in Climate Change Chapter). These CWR streams include the Sandy River, Wind River, Little White Salmon River, White Salmon River, Hood River, Klickitat River, and Deschutes River. The wildlife section of the Natural Resources chapter does allow for wider buffers on a case-by-case basis as needed to protect specific species. |
| **13** | | **Climate** | I don't think any resources should be degraded, but I also recognize the need to plan for people. I also believe that the big issue for agriculture was not mentioned. It isn't bigger riparian buffers, it's helping bring knowledge and change to farm with less chemicals. Using technology like the Soil Food Web. It's knowing how to manage stream areas to have grasses and riparian plants, not weeds. Bigger is not really better, but healthy is. Healthy involves some use on a minimal seasonal method that promotes healthy plants and discourages weeds. You can view areas with no use for 15 or more years now....a lot is not healthy, all weeds and undesirable plants. | The Gorge Commission supports implementation improvements and voluntary measures, along with the Management Plan and ordinances, to achieve the purposes of the Act. Staff will incorporate these suggestions when working with landowners, conservation districts, and other partners. |

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| **14** | | **Climate** | Most important, there is no analysis in this plan of the changes that will happen due to rapidly accelerating climate disruption. If this plan is to be relevant to current and future conditions and effective in protecting the National Scenic Area, it needs to be significantly improved. Climate disruption, as you well know, is a significant and urgent threat to our life support systems on this planet, including the biological systems and ecosystem services from which we benefit in the Columbia Gorge Scenic Area. This means radical changes in how we evaluate and manage this asset to protect it. It means that we must stand strong against the economic interests that can irreversibly damage the Gorge's fragile balance. As I see it, you have relegated consideration of climate impacts to a last minute deliberation at a time when we are faced with double public health emergencies, climate disruption and a pandemic. Your job is to protect and conserve this asset and the natural habitat within it. | The Climate Change Chapter section entitled, "Climate change impacts in the National Scenic Area," provides an overview of current and predicted effects of climate change in the NSA including extreme heat, warmer average air temperatures, shift from snow to rain, earlier runoff, warmer water temperatures, reduced water quality, increased flooding, drought, landslides, and wildfire, changes in species abundance and distribution, and increased invasive species and disease. More detailed analysis of climate change impacts will be incorporated in the climate vulnerability assessment phase of climate change action planning to be completed following adoption of the Draft Management Plan. As of September 2020, the vulnerability assessment for the Columbia River Gorge National Scenic Area, Mt. Hood National Forest, and Willamette National Forest is undergoing peer review and is anticipated for publication as a Forest Service General Technical Report by the end of 2020. The Gorge Commission will incorporate findings from this vulnerability assessment, and other local assessments as available, to develop the Climate Change Action Plan. |
| **15** | | **Climate** | You must have a plan to mitigate the damaging impacts of climate change, and because we do not have much time to slow down these impacts before we reach a point of no return, you must set a 1-year target date to adopt a climate action plan. This means you need to understand how the ecosystems within the area are likely to be impacted by changes such as increased heat, drought, wildfires. | See 5. |
| **16** | | **Climate** | The plan can allow NO reduction in habitat protection; it must prohibit loss or damage to wetlands; it must limit new dwellings in forested areas; it must prevent conversion of forest land to protect the carbon sink that trees provide, to mitigate the effects of climate change. It must protect and increase stream, lake and pond buffers. And it must make sure that no changes to urban area boundaries are made, even minimal ones, because the economic benefit of this protected area to the local urban areas is absolutely dependent on the protection of this scenic ecological area. | See 12, 88, and 90. Responses to Urban Area comments are included in the Urban Area section. |

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| **17** | | **Climate** | I have concerns about the stream setbacks. I have spent a bunch of time looking at your web pages and have not found the exact wording or conditions that will change with the new setback. This will affect my property as well as a number of my neighbors. I think it is very unfair to hide what you are doing with words like "increasing setbacks" and not stating exactly what that means. If you had added a link to where this information might be found, I think you would have gotten a lot more push back. I heard your leader say that we have had 100 feet for a long time and now we need 200 feet. There was vague reference to science as proof. That does not cut it for me. My property value will be reduced by your actions. I am against changing the setback in this VERY underhanded way. | On page 380 in the Draft Management Plan (Climate Change Chapter) released for public comment on June 1, 2020, the Gorge Commission requested comment on preliminary language for a proposed stream buffer policy that would "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." These are the eight streams within the GMA that are included in the Draft Columbia River Cold Water Refuges Plan completed by the U.S. Environmental Protection Agency, Region 10 in 2019. Based on clarification from the EPA, Fifteenmile was removed from this policy (see response 71). At its August meeting, the Gorge Commission approved a 200-foot buffer for the seven EPA priority cold water refuge streams listed above. Existing uses are allowed to continue as long as they meet the standards of their valid, existing permits. Any changes to those uses and any new uses would be reviewed under the new rules in the Management Plan. The Plan allows for variances to setbacks and buffers in the GMA to protect the owner of a parcel the opportunity to establish a residence on the land. |
| **18** | **380** | **Climate** | The Gorge plan needs specifics in handling streams and riparian areas, Page 380. We would like to see revisions require appropriate buffers that provide habitat for salmon and link this requirement to Page 117 of the Natural Resources chapter. | See 12. |
| **19** | **381** | **Climate** | PGC [Portland Garden Club] has a history of opposition to fossil fuel transport through the Gorge. PGC recently sent a letter to DEQ opposing oil transport by rail because of profound risks to environment and we would like to see fossil fuel infrastructure addressed in the new policy, Page 381. | During public scoping conducted in 2016-17, comments were made about including a ban on fossil fuel transport through the Gorge in the Gorge 2020 Plan. Fossil fuel transport policy was determined to be outside the scope of Management Plan review, and is therefore not addressed in the Draft Management Plan. |
| **20** | | **Climate** | I am a member of the Portland Garden Club who has a history of advocating against fossil fuel transport through the Gorge. The PGC recently sent a letter to DEQ opposing oil transport by rail because of the profound risks to the environment. We would like to see fossil fuel infrastructure addressed in this new master plan policy. | See 19 above. |

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| **21** | | **Climate** | If we protect all of our rivers and streams by maintaining existing vegetation, including trees, we can mitigate carbon and protect the climate, and protect local tourism businesses by maintaining our beautiful river valleys for rafters, cold water habitat for fish and people who love to catch them, and vegetative habitat for deer and elk and hunters, as well.<br>All these river and stream habitats will have to be evaluated by biologists, and geologists using lidar, and biologists doing evaluations and surveys of flora and fauna. 200 foot buffers will not be enough. | See 25. |
| **22** | | **Climate** | We all know fires are a major danger in the Gorge, and are a climate change bi-product. Hence, we should maintain strict UGB's so we can more easily defend fires. Scatter site housing will likely cause indefensible fires. In addition, housing density will reduce carbon emissions. | See 90. |
| **23** | | **Climate** | Please help restore the area's livability by completing a climate change action plan within 1 year of adoption of the revised management plan. | See 5. |
| **24** | | **Climate** | This county is very much in need of an expanded recycling program to discourage wilderness trash dumping. Residents would likely be more inclined to participate if there were, at the very least, increased hours at transfer sites, but ideally, curbside service, even if only offered on a twice monthly basis. | Recycling is managed by local governments within the National Scenic Area and is outside the scope of Management Plan review. |
| **25** | | **Climate** | The NSA's stream habitat for trout and salmon is very limited due to topography. Most streams passage for fish is blocked by major water falls. Further the majority of the watersheds are outside of the NSA boundaries. Any change in protections will have little or no impact on water temperature. There is a need for the evaluation of stream bank vegetation to plan for rehabilitation measures to include fencing, notice to users, woody debris and plants. For example, Rock Creek in Mosier was devoid of vegetation below the old Scenic Highway bridge 20 years ago (about 150 yards from confluence with the Columbia River) and efforts to rehabilitate has produced protective vegetation on the stream banks and improved habitat for salmon that spawn in the upper reaches of this seasonal stream. | The Gorge Commission recognizes that various factors affect stream habitat quality and temperature in the NSA, including riparian vegetation and land uses outside NSA boundaries. Stream restoration efforts are often needed before an impacted stream can provide functional fish habitat, as noted in the EPA Draft Cold Water Refuges Plan that staff consulted in developing the 200-foot buffer policy for priority CWR streams in the GMA. For example, the EPA did not list Fifteenmile Creek in Wasco County as a "primary CWR" stream at this time, but rather as having the potential to provide CWR if restored. The Gorge Commission encourages and supports restoration efforts, as described in Part III: Chapter 4: Enhancement Strategies and Policy 7 in the Climate Chapter. |

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| **26** | | **Climate** | I have found the part of the Gorge 20/20 plan that states, "If the Gorge Commission has not completed its evaluation of appropriate stream buffer protections by one year after adoption of the revisions to the 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." How is this possible without allowing the general public to comment on the issue? This would prohibit us from building a house on our property. This will prevent any homes currently legally set back 100' in the GMA from doing any additional development on their property. Even allowed uses and activities in the GMA will be prohibited. This will destroy the land values of the properties in the GMA that legally did not have to meet the standards of the SMA. I will need to seek legal representation on how to prevent this paragraph from becoming part of the final plan. No notifications have gone out to the affected land owners correct? Shouldn't affected land owners be given the opportunity to fight this paragraph within the Gorge 20/20 plan? Can you please include this email as part of the public comments for the Gorge 20/20 plan with the request that the Gorge Commission allow additional time for public comments regarding this particular paragraph of the newly added Climate Change chapter to the Gorge 20/20 plan? | See 17. |
| **27** | | **Climate** | Email noting that a detailed comment letter would follow. Provided two attachments: "Workbook for Scientists" and "Practitioner Workbook" that accompany comments on climate resilience. | Staff will incorporate these resources in climate change action planning. |
| **28** | | **Climate** | Please require a 200-foot protective buffer on each side of all fish-bearing streams in the National Scenic Area, particularly all streams providing habitat for salmon, pending completion of the Climate Change Action Plan. Years ago, before Condit Dam was taken out, some friends and I kayaked down the White Salmon River, putting in just below the dam. I will never forget the beautiful and numerous salmon we floated over in the crystal clear, cold water, all seeking refuge from the hot water temperatures in the main stem of the Columbia River. Please help save these Salmon and other fish by cooling the water temperatures through a 200 foot vegetative stream buffer. | See 12. |

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| **29** | | **Climate** | A 1-year timeline for completion needs to be included. We are running out of time to mitigate climate change. The Climate Change Plan needs to include:<br>No loss of wetlands. Reducing fire risk in the forest lands: by limiting dwellings in forest land and not converting forest land to other uses and losing the carbon sink it provides in the process. Include adequate 200' stream and river buffers. With rising temperatures, salmon survival is questionable. Include protection for species such as salmon, western pond turtles, and pika. Not allow mining, logging and development in pika habitat. | See 5, 12, 88, and 90. |
| **30** | **377** | **Climate** | p. 377, Climate Change Chapter. I think that this chapter and the chapter on VSI should be at the front of the MP. | The Climate Change Chapter was included in Part III: Action Program because a foundational part of this chapter is the Framework for Action for Climate Change Adaptation and Mitigation. GMA Policy 1 directs the Gorge Commission to develop and adopt a Climate Change Action Plan, and Policy 2 is focused on developing climate change indicators through the Vital Sign Indicators (VSI) project. |
| **31** | | **Climate** | There are other entities in the NSA and outside the NSA who are doing regional climate change research and the GC should coordinate with as many entities as possible in order to save money and not reinvent the wheel, if possible. For example, Battelle is managing the NEON project in the Gifford Pinchot National Forest (https://www.battelle.org/government-offerings/energy-environment/environmental-services/ecology/national-ecological-observatory-network). NEON stands for NATIONAL ECOLOGICAL OBSERVATORY NETWORK. Additionally, the Gifford Pinchot Stewardship Collaborative is working with many agencies on projects on the GPNF and some of their work may be pertinent to climate change, resiliency, and resources. WSU is doing research on climate change. OSU has done a lot of research on carbon sequestration in old growth. Dan Donato (I think he still works for WADNR and U of WA) has published a lot of papers on forests and forestry practices and fire: Scholarly articles for Dan Donato research, Pyrogenic carbon emission from a large wildfire in Campbell - Cited by 211; Salvage logging research continues to generate sparks - Stokstad - Cited by 22; Conifer regeneration in stand-replacement portions of... - Donato - Cited by 119. I don't know if PSU has any ongoing climate change research going, but PSU is a good source of graduate students doing studies and these students are always looking for opportunities to advance their research with outside entities. The Corvallis Research Lab may be another source of information on climate change. | The Gorge Commission recognizes that many entities are working on climate change planning, research, and monitoring. Policy 4 in the Climate Change Chapter directs the Gorge Commission to partner with and learn from others. |
| **32** | | **Climate** | I recommend that the GC form a Community Action Team (CAT) on climate change to help with gathering information on all available science and research for the climate change chapter. We can do this faster together. | Public engagement will be part of developing the Climate Change Action Plan. |

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| **33** | **380** | **Climate** | p. 380, para 1, line 6. After “Forest Service, add “and any other federal or state agencies doing climate change research. | This sentence is not intended to be comprehensive of all stakeholders who will be engaged in climate change action planning. The new text is: "The Climate Change Action Plan shall include consultation with the four Columbia River treaty tribes, the Forest Service, the six counties in the National Scenic Area, and shall involve the public. Also, see 31. |
| **34** | **382** | **Climate** | p. 382, para 6, line 3. After “National Scenic Area” add “as long as the first purpose of the NSAA is upheld. | The Management Plan requires that the Gorge Commission consider both purposes of the Act in its policies. |
| **35** | **382** | **Climate** | p. 382. Add paragraph #8: “The GC will urge the urban areas and rural centers to participate in regional climate resilience strategies and plans. | See 31. |
| **36** | | **Climate** | Water is a CRITICAL RESOURCE in the NSA and the GC will conduct, with the assistance of the USFS and other interested parties, research on the cumulative impacts of population growth and development on the water resources of the NSA. The USGS would be a good partner in this endeavor. | GMA Policy 1 in the Climate Change Chapter includes streams and riparian areas as a topic for climate change action planning. Review of and updates to water quality and aquatic health indicators are underway for the Vital Sign Indicators (VSI) project. USFS, USGS, and others are partners in this effort. |
| **37** | | **Climate** | [The Draft Management Plan] adds a section about “climate change,” including a typically non-quantitative prediction. [Footnote reference to Draft Management Plan]: "The National Scenic Area faces numerous current and predicted effects of climate change including extreme heat, warmer average air temperatures, shift from snow to rain, earlier runoff, warmer water temperatures, reduced water quality, increased flooding, drought, landslides, and wildfire, changes in species abundance and distribution, and increased invasive species and diseases." Abandoning reality, this section anticipates that the COMMISSION will mitigate climate change, by influencing activities on the tiny fraction of the Earth’s surface over which the COMMISSION has authority. Consistent with past tactics, this section anticipates implementing additional land use regulations. More prosaically, the section proposes to “monitor long-term trends” and to “develop and adopt a Climate Action Plan.” | See 9. |
| **38** | | **Climate** | After plan review, the Commission should prioritize the development of a “Transfer of Development Rights” program to avoid the climate impacts of dispersed residential development on resource lands and encourage growth to occur in existing urban areas, as required by the purposes of the National Scenic Area Act. | The Climate Change Action Plan may address the possibility of a Transfer of Development Rights program if appropriate. |

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| **39** | | **Climate** | The Commission should prioritize the following issues in its plan review. There should be no delay in adopting these climate adaptation policies: Adopt a climate action plan to better protect resources. Identify how climate change is expected to impact all resources in the Scenic Area and what measures the Commission will take to address those impacts. This can always be periodically updated with new information after plan review and revision is completed. 1. Update fish and wildlife habitat protection based on best available science, such as for salmon. Expand buffers for streams, ponds, and other sensitive wildlife sites. Stream buffers in the General Management Areas of 100 feet for fish-bearing streams and 50 feet for intermittent streams are inadequate. 2. Prohibit the loss of wetlands. Restore wetlands where possible.3. Maximize public safety and environmental rules for any fossil fuel transport through the National Scenic Area. Prohibit coal dust pollution from open-topped coal cars traveling through the Gorge and take enforcement action against polluters and violators. 4. Stop urban expansion. Promote urban planning and encourage growth to occur in existing urban area boundaries, as required by the National Scenic Area Act. 5. Prohibit conversions of forest land to agricultural land. 6. Adopt energy efficiency standards for new dwellings.7. Limit new dwellings within forest zones to reduce the risks of wildfires and to protect human lives. 8. Protect and promote the proliferation of native plants, particularly Native American first foods. 9. Stop urban expansion and require urban growth to occur within the boundaries of the 13 existing urban areas in the Gorge. | See 6, 12, 14, 19, 88, and 90. Section 6d(d) of the Act requires the Management Plan to permit conversion of forest land to agricultural land. The Climate Change Action Plan may address energy efficiency standards for new dwellings if appropriate. The Management Plan requires that development and land use do not adversely affect rare plant species, including species endemic to the Columbia River Gorge and vicinity. See Urban Area Boundaries section for urban expansion response. |
| **40** | | **Climate** | We need detailed, scientific climate change studies with new modeling of key water resources for the gorge and Pacific NW region. We know from EPA and other older studies that the modeling shows a hotter, dryer climate with increasing pressures on the available aquifers, casual streams, creeks and rivers. Much of the beauty of the scenic area relies on springs and seeps that feed native plants, insects, small and large animals. We are facing a change in the amount and type of precipitation expected in the future; just rain wouldn't suffice in sections of the gorge and dry west. Falling annual snow pack levels which traditionally have been sources of water in the late summer early fall timeframes are like "canaries in the coal mines", telling us a key resource is shrinking. It warns of water shortages in the urban and non-urban areas in the gorge as well as increased numbers and severity of devastating fires in all areas of the gorge. Over all reduction in the amount of precipitation will limit the annual recharging of the aquifers and threaten the scenic, agricultural and urban values of the gorge. The water resource modeling as a result of climate changes should inform all areas of the Management Plan going forward. | Examination of climate change impacts on water resources in the NSA will be part of the vulnerability assessment phase of climate change action planning. See 14. |

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| **41** | | **Climate** | For agriculture: Your attempts to change water quality with wider and wider buffer zones is just a band aid approach. If you want to make real progress you have to address the soil food web in the soils to create a healthy place for good plants to grow. It would further the reduction of carbon greatly to support this proven method. Its estimated that the carbon problem could be eliminated in 10 to 15 years just by improving the soil food web and allowing the carbon to be breathed in by beneficial plants and stored in roots to enhance growth. This process also eliminates weeds which grow in unbalanced unhealthy soils. You can read introductory facts about this at Oregon's Soil Food web in Corvallis. Read about Dr. Elaine Ingham's 40 years of proven work on every continent. Promoting this would actually be a tremendous benefit to land owners instead of a takings. Frankly a lot of land you govern called open space is in terrible shape and could and should be managed for beneficial plants, insects and birds. This method is sustainable and affordable for everyone. Please consider taking an approach that really does benefit the land in stead of just locking up land from use for environmental agendas. | See 13. |
| **42** | | **Climate** | Consider impacts of climate change and have a plan to propose counter measures | See 6. |
| **43** | | **Climate** | I write with respect to the Climate Change Chapter in Gorge 2020. I applaud the inclusion of this existential issue, as well as the top-line summary of the new chapter: “Climate change poses the most wide-reaching and urgent challenge facing resource management agencies today. The National Scenic Area is particularly vulnerable to the extremes of climate change impacts, including wildfire, given its topography and high winds.” | See 9. |

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| **44** | | **Climate** | I urge the revised Columbia River Gorge National Scenic Area Management Plan to include SMA land in the Framework for Action to address climate change impacts through an integrated climate adaptation and mitigation approach. Portions of the SMA are among the most vulnerable to the increasing risk of wildfire due to the hotter and drier summers. For example, the popular hiking trail near Catherine Creek, within the SMA, is among the areas rated "very high" for wildfire risk in the 2018 Washington State Department of Natural Resources' Wildland Fire Protection Strategic Plan. This area also has a history of devastating wildfire damage, yet at this time the only land designation with fire protection policies is forest land. I appreciate and acknowledge that tribal lands are rightly the jurisdiction of the Tribes themselves, who have been careful custodians of the land for countless generations. I understand that the U.S. Secretary of Agriculture has primary responsibility for Federal lands in the SMA, and has delegated this responsibility to the U.S. Forest Service. However, I cannot find any reference to the Secretary of Agriculture (or the Forest Service) having primary responsibility for non-Federal lands in the SMA, including privately-held land in the SMA. The Management Plan suggests that that Forest Service provides an important advisory role to the Gorge Commission and its Executive Director on issues regarding these areas. I expect we all agree that the Special Management Area contains invaluable scenic, natural, cultural, and recreational resources that deserve enhanced protections against climate change. To ensure a coordinated and comprehensive approach to this growing challenge, there should be no differentiation in how GMA and SMA land are treated in the Framework for Action. After all, fire does not heed area boundaries drawn on a map, nor can climate change impacts be confined to one area of the Gorge. If the Gorge Commission decides to not include the SMA in the Framework for Action, then an alternative approach might be to reclassify all privately held lands in the SMA as GMA to include these areas in the Framework for Action. | The U.S. Forest Service has responsibility for the Special Management Areas and has added an SMA Provisions section to the Climate Change Chapter in the Draft Management Plan. |
| **45** | | **Climate** | As climate change will negatively impact the entire National Scenic Area, please adopt a climate action plan with a 1-year timeline. | See 5. |
| **46** | | **Climate** | I appreciate the addition of the Climate Change chapter but strongly urge the Commission to revise the proposed language to include Special Management Area (SMA) lands. The NSA must address climate change on a regional level – not parcel out land areas. There has been significant change in the SMA that impacts the region as a whole and this needs to be included in a Climate Action Plan. | See 44. |

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| **47** | | **Climate** | Add language concerning groundwater protection and water quantity as they are significant issues for farmland protection and sustainability. Water related issues are impacted by climate change and have received significant federal dollars in both Hood River (surface water) and Wasco County (ground water). | The Gorge Commission discussed groundwater issues and water quantity regulation as potential topics of interest to include in climate change action planning. At this time, there is not consensus to focus on these topics. |
| **48** | | **Climate** | In addition to a Climate Action Plan consider a strategic and coordinated Resiliency Plan for the cities and counties in the Gorge using a framework that includes equity, resiliency, and climate protection. | This language has been added to the Climate Change Chapter: "The Gorge Commission is committed to ensuring that equity considerations are integrated into climate change adaptation and mitigation analysis, planning, decision-making, and project implementation." Learning about existing climate resilience planning efforts in the Gorge, identifying opportunities for strategic and coordinated approaches, and integrating equity in climate change planning are post-Gorge 2020 work plan priorities. |
| **49** | | **Climate** | We are happy to hear that you are creating a climate action plan. We love our scenic gorge, and feel lucky to live here, where such a jewel is protected. But action requires specifics and a timeline that is not too long. Be brave! Step up! Protect all the species and habitat that are our canaries in the coal. Curb urban expansion, and keep the gorge beautiful for all of us who will need it more than ever. | See 5 and 6. |
| **50** | **379** | **Climate** | New language states "The Gorge Commission has a high profile, managing the largest and most complex jurisdiction of its kind, on the doorstep of one of the region's largest metropolitan areas." According to the Act, the CRGC manages the scenic area non-Federal lands which is a geographic area with a designation via Act, not a jurisdiction. It perhaps is more accurate to call it a regional government body. | Staff clarified this language. The new text is: "The Gorge Commission manages a large and complex mosaic of land ownership on the doorstep of one of the region’s largest metropolitan areas." |
| **51** | **381** | **Climate** | It appears the proposed language for restricting forest practices did not make it into the redlined version of the Management Plan. In the Climate Change Chapter (381) there is language that suggests they have deferred drafting language until there is public comment. Suggested edits from the Commission have included limited [limiting?] some forest practices, which would be in direct conflict with the Oregon Forest Practices Act. | The Management Plan allows forest practices as a use allowed outright, except in Open Space and Ag Special Land Use Designations. |
| **52** | | **Climate** | The Hood River County Transportation District (dba Columbia Area Transit, CAT) is writing in support of the proposal by A. J. Zeleda and Wayne Stewart that the Columbia River Gorge Commission include a section in the revised Management Plan to address transportation by adding transportation to: Key Issues of the Draft Climate Change Action Plan framework and Strategy and Action Plan. | See 1. |

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| **53** | | **Climate** | Specifically, we are asking that the strategy and action plan include language that the Columbia River Gorge Commission work with the Mid Columbia Economic Development District (MCEDD) to convene a Transit Visioning Session that would review, refine and work with stakeholders to adopt the MCEDD Draft Gorge Transit Vision and guiding principles document (e.g. as the Gorge Transit Strategy Project) in early Fall. We believe this document could be the first piece of a larger effort by stakeholders to develop a broader Multimodal Transportation and Congestion Mitigation Plan for the Gorge. | Staff clarified language for GMA Policy 5 in the Climate Change Chapter. The new text is: "The Gorge Commission will work with regional partners engaged in sustainable transportation planning to convene regional discussions and coordinate strategies on alternatives to automobile transit to achieve multiple objectives under the Act and to reduce greenhouse gas emissions." Also, see 1. |
| **54** | | **Climate** | This new task [Climate Change Action Plan] will require a significant devotion of resources at a time when agency budgets are threatened by the impacts from COVID-19. Following adoption of the revised Management Plan, the Gorge Commission's focus should be on implementation of the new plan and working with counties to adopt these changes into their local ordinances. Skamania County requests that this chapter not be included in the final revision to the Management Plan. If the Gorge Commission proceeds with the adoption of the chapter, the automatic imposition of wider stream buffers for cold water refuge streams and prohibition on certain conversions of forest land should be removed from this chapter. Any further policy considerations should be considered only with the Gorge Commission has the time and resources to full [sic] study this issue and when the public is provided adequate opportunity to comment. | Climate change affects all resources that the Gorge Commission manages and therefore needs to be addressed in the Management Plan. Following adoption of the Draft Management Plan, staff will develop a work plan to integrate climate change action planning with other Commission priorities, in particular working with counties to adopt changes in local ordinances. The Gorge Commission recognizes that significant climate change planning work has already been done in the region and will draw from existing resources whenever possible. Also, see 12 for cold water refuge stream buffer policy and 63 for forest land conversion responses. |
| **55** | | **Climate** | This is a new chapter that was not identified in the June Redline as a revision to the current Management Plan (not shown in redline). While staff may have noted that the Climate Change chapter was new in its materials, that does not correct the procedural error of releasing a redline draft that fails to identify all new or revised language in redline. The chapter should be redlined and re-noticed for public comment with the new language highlighted for the public. The Port proposes revisions to the Climate Change chapter included as Attachment 2. It is appropriate for the Commission to adopt policies and priority statements but the Commission should defer adopting specific language until after the Commission has developed the Climate Change Action Plan. Many of the statements made in the draft chapter are aggrandizing the Commission’s role in climate change and simply reiterating the Commission’s view of its self importance. These types of statements are unnecessary and do nothing to further the Commission’s policies. The Climate Change Action Plan should be approved and incorporated into the next periodic review of the Management Plan. | All outreach materials sent out by the Gorge Commission indicated that the Climate Change Chapter was new. As soon as this redline formatting error was brought to the Gorge Commission's attention, the Climate Change Chapter was changed from black text to all red text and posted on the Gorge Commission website on June 11, 2020 prior to the public information webinar on this date. An announcement was made about this reformatted version during the New Climate Change Chapter presentation included in this webinar. |

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| **56** | | **Climate** | This is a new chapter that was not identified in the June Redline as a revision to the current Management Plan (i.e., not shown in redline). While staff may have noted that the Climate Change chapter was new in its materials, that does not correct the procedural error of releasing a redline draft that fails to identify all new or revised language in redline. The chapter should be redlined and re-noticed for public comment with the new language highlighted for the public.<br>The Port proposes revisions to the Climate Change chapter included as Attachment 2. It is appropriate for the Commission to adopt policies and priority statements but the Commission should defer adopting specific language until after the Commission has developed the Climate Change Action Plan. Many of the statements made in the draft chapter aggrandize the Commission's role in addressing climate change and simply reiterate the Commission's view of its self-importance. These types of statements are unnecessary and do nothing to further the Commission's policies.<br>The Climate Change Action Plan should be approved and incorporated into the next periodic review of the Management Plan. | See response 55 above. |
| **57** | **377** | **Climate** | Page 377: Suggested edit [additions in bold, deletions in strikethrough]: As a bi-state agency, **the Gorge Commission is positioned** ~~with responsibility for protecting and enhancing a broad set of affected resources, the Gorge Commission has compelling reasons to take a comprehensive view of the challenge and a unique opportunity~~ to contribute to regional solutions **for addressing climate change**.<br><br>Page 377: Suggested edit [additions in bold, deletions in strikethrough]: **Given the Gorge Commission's role in protecting these resources under the National Scenic Act, [it] is appropriate for** ~~Thus,~~ the Management Plan **to** ~~must~~ address **climate change** ~~it~~. | Staff incorporated the first suggested edit. The new text is: "As a bi-state agency, the Gorge Commission is positioned to contribute to regional solutions for addressing climate change." For the second suggestion, staff retained the original language. |
| **58** | **378** | **Climate** | Page 378: Suggested edit [additions in bold, deletions in strikethrough]: Given the complex and interconnected nature of climate change impacts in the National Scenic Area, it is **important** ~~essential~~ that climate resilience, adaptation, and mitigation efforts involve federal, bi-state, state, **county, city** ~~municipal~~, and **T**~~t~~ribal governments **as well as the public**. ~~These governments have made a commitment to each other to collectively ensure the continuing health and vitality of the National Scenic Area through the Columbia River Gorge Compact.~~ | Staff clarified this language. The new text is: "Given the complex and interconnected nature of climate change impacts in the National Scenic Area, it is essential that climate resilience, adaptation, and mitigation efforts involve federal, bi-state, state, county, city, and tribal governments, as well as the public." The term "tribal governments" is not capitalized to be consistent with references to other government entities in the Management Plan. Gorge Commission staff discussed how the Management Plan should reference our tribal partners with representatives from the Columbia River Inter-Tribal Fish Commission. |

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| **59** | **378** | **Climate** | Eliminate description of Management Plan and Gorge Commission's roles to advance climate resilience efforts, starting from "The National Scenic Area Act's focus on…" in last paragraph of page 378 through all of page 379. | Staff retained this language because it describes how the Act and Management Plan provide a foundation, and play a continued role, in the Gorge Commission's climate resilience work. |
| **60** | **380** | **Climate** | Eliminate this sentence from Framework for Action introductory text on page 380: "The Gorge Commission has a high profile, managing the largest and most complex jurisdiction of its kind, on the doorstep of one of the region's largest metropolitan areas." | Staff clarified this language. See 50. |
| **61** | **380** | **Climate** | Under GMA Policy 1: Add Washington, Oregon, and NSA counties and cities to list of entities Gorge Commission will consult with on the Climate Change Action Plan. Include this sentence: "The Gorge Commission shall adopt the Climate Change Action Plan through a public process with opportunities for public and stakeholder input, public comment, and public hearings." | Staff modified this language to include the six counties in the NSA. The new text is: "The Climate Change Action Plan shall include consultation with the four Columbia River treaty tribes, the Forest Service, the six counties in the National Scenic Area, and shall involve the public." This list is not intended to be comprehensive of all stakeholders who will be engaged in developing the Climate Change Action Plan. Public input will be an important part of the planning process. |
| **62** | **380** | **Climate** | Under GMA Policy 1: Eliminate all preliminary language about the interim stream buffer protection, including the explanatory footnote. | See 12. |
| **63** | **381** | **Climate** | Under GMA Policy 1: Eliminate all preliminary language about prohibiting conversion of forest lands. | At its August meeting, the Gorge Commission approved language for GMA Policy 1, removing "forest practices" from the list of potential approaches and adding "timber production" to the statement about carbon storage. No change to the "prohibit conversion of forest lands..." statement was proposed. The new text is: "B. Forest resources – protecting forested lands for timber production which provides for carbon storage. This includes siting and development standards, land conversion policies, and other approaches. (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. (See “Land Use Policies” in Part II, Chapter 2: Forest Land.)" |
| **64** | **381** | **Climate** | Under GMA Policy 1: Eliminate last bullet with Agricultural lands language. | The Gorge Commission did not propose an amendment to this draft language at its August meeting, thus no change was made. |
| **65** | **380** | **Climate** | Under GMA PROVISIONS, it calls for “a Climate Change Action Plan . . . based upon a local climate vulnerability assessment.” It doesn’t mention any more about this assessment; does it need to? I.e., how will it be done, by whom, timeline? Or is it intended to be left vague? | The Gorge Commission will review existing climate vulnerability assessment data for the region, including the USFS assessment for the National Scenic Area currently in draft form. This will be the first phase of climate change action planning work to be completed following adoption of the Draft Management Plan. Also, see 14. |

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| **66** | **380** | **Climate** | Three bulleted priorities are listed on p. 3. [in Climate Change Chapter]. We recommend the addition of a 4th bullet stating in essence: “Invasive Species – enhanced monitoring and control/removal actions where feasible and appropriate.” | Staff added invasive species to the list of climate change action planning topics under GMA Policy 1. The new text is: "D. Invasive Species – protecting biodiversity through invasive species monitoring and management." |
| **67** | **382** | **Climate** | [Climate Change Chapter] currently says: “3. Based upon the findings of the vulnerability assessment and monitoring program, the Gorge Commission may determine that conditions in the National Scenic Area have significantly changed and has the authority to develop a Management Plan amendment pursuant to section 6(h).” We suggest changing the language from “has the authority to” to “may exercise its authority to.” | Change made. The new text is: "Based upon the findings of the vulnerability assessment and monitoring program, the Gorge Commission may determine that conditions in the National Scenic Area have significantly changed and may exercise its authority to develop a Management Plan amendment pursuant to section 6(h).” |
| **68** | | **Climate** | Wonder if a #8 should be added, something like: “The Gorge Commission will support and advocate policies and legal mechanisms that contribute to reducing the sources and causes of climate change impacts.” I.e., the Commission should help get to the root of the problem. | GMA Policy 5 focuses on reducing the sources and causes of climate change impacts by directing the Gorge Commission to "develop and implement climate mitigation strategies, as consistent with the Gorge Commission's authorities and responsibilities, that limit and reduce greenhouse gas emissions, enhance forest carbon storage, and encourage renewable energy and transportation solutions." |
| **69** | | **Climate** | We would like to share our new riparian habitat management tools as a recommendation for addressing riparian buffers throughout the plan. The purpose of WDFW’s forthcoming Priority Habitat and Species (PHS) Riparian Volume 2: Management Recommendations is to provide guidance to protect, and—where possible, restore—healthy, intact, and fully functioning riparian ecosystems. The width of the riparian ecosystem is typically based on site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain. A fundamental component of PHS Riparian Volume 2 is the use of SPTH at 200years (SPTH200) to help delineate the width of the area that, when fully functioning, provides sufficient riparian habitat for fish and aquatic wildlife, and also generally supports the riparian habitat needs that terrestrial wildlife have. SPTH200 is based on a number of characteristics including soil type, slope, most common long-lived tree species, and the predominant surrounding ecosystem within the landscape. Washington Department of Fish and Wildlife complied and analyzed this data for the majority of Washington State and created an online, publicly-available mapping tool to depict this information spatially. | The Gorge Commission appreciates the specific recommendation and tool for addressing riparian buffers and will incorporate this information as part of climate change action planning. GMA Policy 1 includes "streams and riparian areas" as a topic for this planning effort. Also, see 12. |

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| **70** | **381** | **Climate** | Ecology supports the expansion of buffers from 100 ft to 200 ft for new proposed land use activities along the eight identified streams in the general management area (GMA) in order to help protect cold water refugia (CWR). We recognize the CWR are crucial for supporting salmonid populations in the Columbia River and its tributaries. We note that in many cases, CWR in streams are associated with groundwater discharges to stream channels. Emerging science indicates that upland land use management outside of riparian zones as well [as] climate change influences groundwater quality, including water temperatures [footnote]. Therefore, we encourage the CRGC to work with partners to identify potential areas upon the landscape where current land use, or land use changes, may affect groundwater temperatures. These areas may need enhanced management measures in order to fully protect groundwater temperatures, and therefore surface water temperatures in management areas. | See 12. The connection between the Gorge Commission's land use standards and groundwater temperatures may be explored as part of climate change action planning. |
| **71** | **381** | **Climate** | The U. S. Environmental Protection Agency (EPA) Region 10 appreciates and supports reference in the Draft Management Plan of rivers in the CRGNSA that have been identified by EPA as providing cold water refuge (CWR) for migrating salmon and steelhead in the Columbia River. Protecting the volume of cold water in the lower portions of the rivers that provide CWR is important to ensure attainment with Oregon's Clean Water Act cold water refugia narrative water quality standard and support the recovery of salmon and steelhead throughout the Columbia River Basin. As noted in the Draft Management Plan, the EPA has identified the Sandy River, Tanner Creek, Eagle Creek, Herman Creek and Cove, Wind River, White Salmon River, Little White Salmon River and Drano Lake, Hood River, Klickitat River, and the Deschutes River as "primary CWR" in EPA's 2019 Draft Columbia River Cold Water Refuge Plan, which EPA plans to soon finalize. Further, EPA has identified Bridal Veil Creek, Wahkeena Creek, and Rock Creek as nonprimary CWR tributaries and Fifteenmile Creek as having the potential to provide CWR if restored. | This clarification is appreciated. Staff initially included eight profiled streams from the EPA Draft Cold Water Refuges Plan that were located within the GMA. Fifteenmile Creek is not listed by EPA as a primary CWR habitat at this time. EPA recommends restoration of Fifteenmile to improve its potential to provide CWR habitat. At its August meeting, the Gorge Commission approved a 200-foot buffer for seven EPA priority CWR streams within the GMA and eliminated Fifteenmile based on this comment from EPA. |
| **72** | **381** | **Climate** | EPA recognizes the important role the Management Plan for Columbia River Gorge National Scenic Area serves to protect these important rivers that provide CWR. We support the application of best available science and the proposed 200-foot stream buffer protection for these rivers within the General Management Area as part of the Climate Change Action Plan. | See 12. |

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| **73** | **382** | **Climate** | GMA policies on page 382 policy 5 (last sentence): The Gorge Commission will convene regional discussions on alternatives to automobile transit to achieve multiple objectives under the Act and to reduce greenhouse gas emissions. ODOT recommends modifying this sentence to read: *The Gorge Commission will convene and coordinate activities and regional discussions in conjunction with state transportation and transit agencies on alternatives to automobile transit to achieve multiple objectives under the Act and to reduce greenhouse gas emissions.* | Staff modified this language. See 53. |
| **74** | | **Climate** | The Friends of the Historic Columbia River Highway support the proposal by A. J. Zeleda and Wayne Stewart that the Columbia River Gorge Commission include a section in the revised Management Plan to address Transportation, adding Transportation to 1) Key Issues of the Draft Climate Change Action Plan framework and 2) Strategy and Action Plan. Specifically, that the Columbia River Gorge Commission indicate their intent to convene a group to develop a Transportation Plan (including transit) for the Gorge, including a Congestion Management Plan. | See 1. |

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| **75** | **380 381** | **Climate** | Policy 1, Page 380: Add a target for completion of the Climate Change Action Plan within one year of the adoption of the revised Management Plan. Streams and Riparian Areas, Page 380: Require a 200-foot protective buffer on each side of all fish bearing streams in the National Scenic Area, particularly all streams providing habitat for salmon, pending completion of the Climate Change Action Plan. Link this requirement to the Natural Resources Chapter of the Management Plan, Guideline 2.B., Page 117. This standard has been applied for nearly 30 years in the Special Management Areas (SMAs) and needs to be applied to streams within the General Management Area (GMA) of the Gorge. Upon completion of the Climate Change Action Plan, review the 200-foot buffer requirement based on the best available science and improve the buffer protections if necessary. Other Water Resources and Wildlife Habitat, Page 381: In addition to stream buffers, add a priority to expand protections for the Columbia River, wetlands, ponds, lakes, and wildlife habitat. Prohibit the loss or destruction of wetlands. Improve pond and lake buffers to protect endangered Western Pond Turtle nesting and rearing habitat. Improved policies to protect unique low elevation habitat for the American Pika from disturbances caused by mining, logging, and development. Link these policies to the Natural Resource Chapter of the Management Plan. Forest Resources, Page 381: To better provide for the mitigation of climate change through carbon sequestration, prevent the conversion of forest lands to residential and agricultural uses. If agricultural conversions are allowed, require full mitigation for the loss of forest land. Change "should" to "shall" regarding full mitigation for the loss of forest land. Revise Part II, Chapter 2 of the Management Plan to incorporate these changes. Wildfire and Limiting New Dwellings in Forest Land, Page 381: Climate change is causing increased frequency and severity of forest fires. To protect forest land, reduce the risk of human-caused fires, protect public safety and property, and reduce risks to emergency responders, prioritize policies that limit new dwellings on forest lands. Develop policies to prohibit new forest dwellings on productive forest land. Limit new dwellings to Small Woodland zones on parcels that are not eligible for state forest tax assessment programs. Develop new siting and development standards to reduce the risks of fire. Revise Part II, Chapter 2 of the Management Plan to incorporate these measures. Wildfire and Recreation, Page 381: Add a section to require coordinated temporary closure of recreation sites and trails when there is an extreme risk of fire, such as the conditions that existed when the Eagle Creek fire was ignited in 2017. | See 5, 12, 88, 89, 90, and 91. |
| **76** | | **Climate** | Friends acknowledges the work of the staff to develop a new Climate Change chapter. However, for the past three years the Commission staff assured Gorge Commissioners and the public that the entire Management Plan review would be conducted through the lens of climate change. Now, more than three years after the initiation of plan review, we are not aware of any part of the Management Plan that has been reviewed through the lens of climate change, nor have we seen any documents or proposed revisions that included substantive policies or guidelines to address climate adaption or mitigation. | Staff reviewed the current Management Plan, organized a panel of climate experts in February 2018, contracted with a consultant to evaluate climate impacts in the National Scenic Area in October 2019, and documented where climate adaptation and resilience was already addressed in the Draft Management Plan with a presentation to the Gorge Commission in February 2020. Based on this comprehensive overview and public comment, staff prepared a new Climate Change Chapter which was approved by the Commission at the August 2020 meeting. |

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| **77** | **380** | **Climate** | GMA Policy 1. Page 380. The Climate Action Plan has no timeline or deadline included. As written, development and implementation could be delayed for many years. Require a one-year deadline for completion of the Climate Action Plan. | See 5. |
| **78** | **380** | **Climate** | Policy 1 is silent on review and approval of the Climate Action Plan. The plan must be reviewed by the Gorge Commission for consistency with the Management Plan and approved by a vote of the Commission. [Proposed revisions in italics]: *Within one year of the adoption of this Policy,* T*t* he Gorge Commission shall develop and adopt a Climate Change Action Plan that is based upon a local climate vulnerability assessment that integrates risk information with regional land use data. The Climate Change Action Plan shall include specific strategies and actions for climate adaptation and mitigation. The Climate Change Action Plan shall include consultation with the four Columbia River treaty fishing tribes and the Forest Service, and shall involve the public. *The Climate Action Plan shall be reviewed by the Gorge Commission and Forest Service, and approved if determined to be consistent with the National Scenic Area Act and the Management Plan.* The Climate Change Action Plan shall be regularly reviewed and updated as needed, based upon new data and information. | See 5 for response to one-year adoption date. Staff added the second suggestion to Policy 1: "The Climate Action Plan shall be reviewed by the Gorge Commission and Forest Service, and approved if determined to be consistent with the National Scenic Area Act and the Management Plan." |

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| **79** | **380** | **Climate** | Policy 1. Page 380. Stream and riparian areas. The Climate Action Plan needs to require a 200 foot buffer for all fish bearing streams in the National Scenic Area. Stream buffers in the General Management Area were adopted more than 30 years ago and are inadequate for providing protection of critical habitat for endangered salmon. Salmon habitat protection in the Special Management Areas and on federal forest lands is far more protective and is based on the best available science. Management recommendations for stream protection developed by the Washington Department of Fish and Wildlife that apply elsewhere in Washington are far more protective than the minimal stream buffers that apply in large areas of the National Scenic Area. https://wdfw.wa.gov/publications/00029. The USEPA has developed a draft Cold Water Refuge Plan for the Lower Columbia River that includes several tributaries within the National Scenic Area. Cold Water Refuge (CWR) is essential to the survival salmonids, particularly when temperatures reach 20 degrees in the Columbia River, Species most reliant on CWR include ESA federally-listed summer steelhead and fall Chinook, because the timing of their upstream migration coinciding with peak temperatures on the main stem of the Columbia River. https://www.epa.gov/columbiariver/draft-columbia-river-cold-water-refuges-plan. In 2009, the Gorge Commission determined that the habitat quality of 13 watersheds in the National Scenic Area was either moderate or impaired. None of the watersheds had an overall rating of good for stream habitat quality. Eight of the 13 watersheds were rated as having impaired stream habitat quality. The analysis does not include many important tributaries within the National Scenic Area that provide habitat for ESA listed salmonids, such as Gibbons Creek, Lawton Creek, Duncan Creek, Greenleaf Creek and others http://gorgevitalsigns.org/Reports/VSI_SOG_Natural2009.pdf. [Proposed addition in bold, remove in italics]. Policy 1. Page 381. Streams and riparian areas – protecting and enhancing aquatic and riparian systems. This includes expanding stream buffers, requiring vegetation enhancement, protecting cold water refuge habitats, and other approaches. 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: apply the existing SMA buffer width (200 feet) to *cold water refuge* **fish-bearing** 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.* | During its August meeting, the Gorge Commission approved a policy requiring a 200-foot buffer on cold water refuge (CWR) streams in the GMA. The seven streams included in this policy are identified as priority CWR habitat in the EPA Draft Cold Water Refuges Plan. (See 12). The 2009 Vital Sign Indicators (VSI) Report finding referenced in this comment was included for the Habitat Quality Vital Sign on page 25. While the identified measure for this vital sign was the "percent of native fish habitat that is properly functioning," the report explains that no consistent assessment of stream habitat quality addressing the data called for in this indicator existed in 2009. Thus, a proxy was used: "the number of watersheds where stream habitat quality is good." Proxy data sources included multiple watershed analyses, restoration plans, and other studies and databases addressing habitat quality in the gorge over the 15 years prior to the report publication date in 2009. The impaired watersheds listed in this report were Lower Sandy River, Western Gorge - Oregon (lower reaches only), Western Gorge - Washington (lower reaches only), Hood River, Mosier Creek, Catherine and Major Creeks lower reaches, and Fifteenmile Creek. The 2009 report may not have included analysis of Gibbons Creek, Lawton Creek, Duncan Creek, Greenleaf Creek and others based on data availability at the time. These suggestions will be taken into consideration when revising and updating indicators for the VSI project. |
| **80** | **381** | **Climate** | Policy 1. Page 381. Forest resources – This policy should explicitly prohibit conversion of forest land to residential uses. Recommendation: [Proposed revision in italics] Forest resources – protecting forested lands for carbon storage. This includes siting and development standards, forest practices policies, land conversion policies, and other approaches. The Gorge Commission shall prohibit conversion of forest lands to *residential use or* any use other than agriculture, recreation, and open space. For conversion to agriculture or recreation, the Management Plan should require full mitigation. | See 89. |

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| **81** | **381** | **Climate** | Policy 1. Page 381. Wildfire – New dwellings in forest land should be prohibited. Dwellings in forest land increase the risks of human caused fires, endanger public health, safety, emergency responders and property. The Climate Action Plan should examine prohibiting new dwellings in Large Woodland zones and Small Woodland zones on parcels eligible for, or enrolled in the forest tax assessment program. Recommendation:<br>[Proposed revision in italics] Wildfire – protecting scenic, natural, cultural, and recreation resources from wildfire and reducing the risk of human-caused ignitions from new development and other causes. This includes *prohibiting new residential development in forest land,* siting and development standards, building design and materials standards, and other approaches. | At its August meeting, the Gorge Commission did not propose an amendment with this suggested language, and thus no change was made here. See 89. |
| **82** | **381** | **Climate** | Policy 1. Page 381. The list of issues needs to include ecosystem change, habitat risks, changes to hydrology and the risks of floods. Link these issues to specific policies in the Management Plan. Recommendation: [Proposed revision in italics] *Assess risks and likely changes to ecosystems, Priority Habitats, wildlife, ground water and surface water in the Climate Action Plan. Develop policies to adapt to these risks and avoid adverse effects where possible.* | The new text is "C. Priority Habitats – protecting Priority Habitats by assessing the risks and likely impacts of climate change and developing policies to adapt to these impacts where possible." This list is not intended to be comprehensive of all topics included in climate change action planning. |
| **83** | **382** | **Climate** | [Proposed revision in bold] In recognition of MCEDD's history with regional transportation issues in the Gorge, we request you add us as a partner in the Climate Change Chapter as follows: Page 382: 5. The Gorge Commission will develop and implement climate mitigation strategies, as consistent with the Gorge Commission's authorities and responsibilities, that limit and reduce greenhouse gas emissions, enhance forest carbon storage, and encourage renewable energy and transportation solutions. The Gorge Commission will *work with partners like Mid-Columbia Economic Development District and the Gorge Translink Alliance to* convene regional discussions on alternatives to automobile transit to achieve multiple objectives under the Act and to reduce greenhouse gas emissions. | The Gorge Commission recognizes that many agencies and organizations are engaged with regional transportation issues in the National Scenic Area. To acknowledge this fact in GMA Policy 5, the Draft Management Plan language was updated to reflect working with partners in convening and coordinating activities related to transportation. |
| **84** | | **Climate** | We advocate for the Climate Resiliency Plan to include recreation-based transportation needs when considering future climate resiliency solutions. | See 1. |

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| **85** | | **Climate** | The Management Plan's policies and guidelines for protection of are woefully out of date and do not present the best available science. There is not a single mention of climate change in the entire plan or any policies to lessen the impacts of climate change. The draft revised Management Plan must include climate actions to better protect the scenic, natural, cultural, and recreation resources of the Gorge, stop urban sprawl, and protect forests from human-caused wildfires. Thank you for taking the first step toward addressing climate change by creating a "Climate Change" chapter in the Management Plan and proposing the future development of a climate action plan. However, climate adaptation and mitigation policies are necessary now to fulfill the purposes of the National Scenic Area Act and protect fish, wildlife, sensitive plants, and human health in the Gorge. | See 6, 12, 88, 89, and 90. |
| **86** | **380** | **Climate** | Policy 1. Page 380:<br>Add a target for completion of the Climate Change Action Plan within one year of the adoption of the revised Management Plan. | See 5. |
| **87** | **380** | **Climate** | Page 380:<br>Require a 200-foot protective buffer on each side of all fish-bearing streams in the National Scenic Area, particularly all streams providing habitat for salmon, pending completion of the Climate Change Action Plan. Link this requirement to the Natural Resources Chapter of the Management Plan, Guideline 2.B., Page 117. This standard has been applied for nearly 30 years in the Special Management Areas (SMAs) and needs to be applied to streams within the General Management Area (GMA) of the Gorge. Upon completion of the Climate Change Action Plan, review the 200-foot buffer requirement based on the best available science and improve the buffer protections if necessary. | See 12. |
| **88** | **381** | **Climate** | Other water resources and wildlife habitat. Page 381:<br>In addition to stream buffers, add a priority to expand protections for the Columbia River, wetlands, ponds, lakes and wildlife habitat. Prohibit the loss or destruction of wetlands. Improve pond and lake buffers to protect endangered Western Pond Turtle nesting and rearing habitat. Improve policies to protect unique low elevation habitat for the American Pika from disturbances caused by mining, logging and development. Link these policies to the Natural Resource Chapter of the Management Plan. | During its August 2020 meeting, the Gorge Commission approved the change from "no net loss" to "no loss" in Goal 1 of Part I, Chapter 3: Natural Resources, GMA Provisions, Water Resources: Wetlands, Streams, Ponds, Lakes, and Riparian Areas. Goal 1 now reads: "Achieve no loss of wetlands acreage and functions." The Gorge Commission did not amend the Draft Management Plan language to include revised buffers for any specific species because the wildlife section in the Natural Resources chapter allows for species-specific conditions of approval which may include wider buffers. Proposed development is reviewed to ensure no adverse effects on rare and sensitive species and habitats. Pika and their habitats, including talus slopes, are protected under the Management Plan. |

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| **89** | **381** | **Climate** | Forest resources. Page 381:<br>To better provide for the mitigation of climate change through carbon sequestration, prevent the conversion of forest lands to residential and agricultural uses. If agricultural conversions are allowed, require full mitigation for the loss of forest land. Change “should” to “shall” regarding full mitigation for the loss of forest land. Revise Part II, Chapter 2 of the Management Plan to incorporate these changes. | During its August 2020 meeting, the Gorge Commission approved this language: "Forest resources – protecting forested lands for timber production which provides for carbon storage. This includes siting and development standards, land conversion policies, and other approaches. (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. (See “Land Use Policies” in Part II, Chapter 2: Forest Land.)" |
| **90** | **381** | **Climate** | Wildfire and limiting new dwellings in forest land. Page 381:<br>Climate change is causing increased frequency and severity of forest fires. To protect forest land, reduce the risk of human-caused fires, protect public safety and property and reduce risks to emergency responders, prioritize policies that limit new dwellings on forest lands. Develop policies to prohibit new forest dwellings on productive forest land. Limit new dwellings to Small Woodland zones on parcels that are not eligible for state forest tax assessment programs. Develop new siting and development standards to reduce the risks of fire. Revise Part II, Chapter 2 of the Management Plan to incorporate these measures. | During its August 2020 meeting, the Gorge Commission approved a policy prohibiting new dwellings in Commercial Forest and Large Woodland Land Use Designations (in Part II, Chapter 2: Land Uses). |
| **91** | **381** | **Climate** | Wildfire and recreation. Page 381:<br>Add a section to require coordinated temporary closure of recreation sites and trails when there is an extreme risk of fire, such as the conditions that existed when the Eagle Creek fire was ignited in 2017. | See response to comment 2 in the Recreation Resources section. |
| **92** | **381** | **Climate** | Fossil fuel infrastructure. Page 381:<br>Add a new policy to prioritize limits on the development and transportation of fossil fuels. For example, develop policies to prohibit new, or the expansion of, existing fossil fuel infrastructure development, such as pipelines to transport oil or fracked gas. | See 19. |

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| **93** | **381** | **Climate** | Multiple provisions of the proposed Amendments negatively impact the rights and responsibilities of non-federal timber landowners, in direct contravention of the savings provision. In addition, the Amendments effectively limit private landowner autonomy and stifle economic development in the GMA, which conflicts with legislative intent. We are particularly concerned with the provisions affecting forest management and forest land conversion including, but not limited to: Amendments to the Action Program to add a policy for expanded buffers, add standards to preserve forest resources for carbon storage, add climate change to the cumulative impacts analysis, limit enhancement of land for forest uses, and alter economic development policies for the GMA. | The Management Plan allows forest practices as a use allowed outright, except in Open Space and Ag Special Land Use Designations. |
| **94** | | **Climate** | Studies need to be incorporated in the Climate Change Chapter with a focus on impacts to water. Population pressure and decreased precipitation rates affect water resources. Look at water modeling in the gorge and the Pacific Northwest. | See 14. |
| **95** | | **Climate** | Little analysis in this Plan of climate change impacts; needs to be significantly improved. Climate disruption is a significant and urgent threat to biological systems and ecosystem services in the National Scenic Area. Need a plan to assess and mitigate the impacts of climate change. Include a near target date of one-year or less to adopt a Climate Action Plan that requires the following: Allow no reduction in habitat protections. Prohibit loss of or damage to wetlands. Limit new dwellings in forested areas. Prevent conversion of forest land to protect carbon sinks. Protect and increase stream, lake, and pond buffers. | See 5, 14, 88, and 90. |
| **96** | | **Climate** | Implement a 200-foot vegetative stream buffer on streams and rivers that enter the Columbia River to protect cold water refuge habitat for salmon and other fish. | See 12. |
| **97** | | **Climate** | Concerned about water temperature in two creeks that enter the Columbia River in Mosier. Buffers on the creeks just outside of the city and outside the Scenic Area are either nonexistent or clearcut areas. | See 25. |
| **98** | | **Climate** | Include a target completion date of one year for Climate Action Plan | See 5. |
| **99** | | **Climate** | Consider accelerating Vital Sign Indicators program. | The Vital Sign Indicators (VSI) project and Climate Change Action Plan are priorities in the Gorge Commission's post-Gorge 2020 work plan. Policy 2 in the Climate Change Chapter focuses on integrating climate change action planning with VSI, including developing climate change indicators. |
| **100** | | **Climate** | Encourage the Gorge Commission to plan for the climate change chapter in the next year; aligns with the Hood River County Energy Plan adopted by the City of Hood River, Hood River County, Port of Cascade Locks, and Port of Hood River. | See 5 and 6. |

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| **101** | | **Climate** | Appreciate that climate change is formally recognized in the Draft Management Plan. Support other comments made tonight regarding advocacy for stream buffer protections associated with forest practices. | See 12 and 93. |
| **102** | | **Climate** | Support development of a Climate Change Action Plan with a one-year timeline for completion that includes the following: No loss of wetlands. Reduction of fire risk on forest lands by limiting dwellings. Adequate stream buffers of 200 feet. Protection for species such as salmon, Western pond turtle, and pika; do not allow mining, development and logging in pika habitat. | See 5, 12, 88, and 90. |
| **103** | | **Climate** | Request more commitment to climate change; include a one-year target for adopting a Climate Action Plan. While the Commission did contract with a consultant to complete a high-level climate change impacts study, suggest that additional studies be commissioned on the most vulnerable aspects of the Gorge to climate change and specific protections needed. Examples of these protections include buffers on streams, rivers, ponds, and lakes to protect sensitive species. | See 5 and 14. |
| **104** | | **Climate** | Should be tracking keystone species and monitoring impacts of climate change, development, and recreation on forest and water health. Need a specific and measurable plan to address impacts of climate change. | See 99. |
| **105** | | **Climate** | Need policies and guidelines on climate change immediately. | See 5, 12, 88, and 90. |
| **106** | | **Climate** | Please strengthen policies regarding climate change and include a one-year timeline for adopting a climate change plan and protecting the gorge for climate change. | See 5. |
| **107** | | **Climate** | We want you to implement a new chapter on climate change by allowing science to dictate natural recovery of forests impacted by fire (prohibit post fire logging); increase protective buffers for streams; and preservations of natural resources and others. | See 6 and 12. Forest management on the vast majority of forested lands in the NSA is designed and carried out by the U.S. Forest Service and other landowners. The Act protects lawful application of state Forest Practices Acts on private forest lands. The Management Plan does allow and support proactive forest health and fuels reduction activities, and it requires fire protection measures for new development on forest Land Use Designations. |
| **108** | | **Climate** | There is currently no mention of climate change and global warming anywhere in the management plan. With your help we would like to change that, and ensure that the Gorge Commission and Forest Service are adequately preparing to confront the many challenges and impacts we can expect from global warming in the decades to come. A good first step would be to improve natural and scenic resource protection standards to address impacts from climate change. | See 6. |

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| **109** | | **Climate** | Adopt guidelines addressing fossil fuel transport through the National Scenic Area, including oil and coal trains. For example, require analysis of worst-case oil spills from oil train derailments and prohibit coal pollution from open-topped coal cars. | See 19. |
| **110** | | **Climate** | Expand protective buffers for fish, wildlife and rare plants to better reflect the best available science and to adapt to climate change. | See 12 and 88. |
| **111** | | **Climate** | Assess the impacts of climate change on protected species and habitat. | See 82. |
| **112** | | **Climate** | Thank you for moving forward with a Climate Action Plan for the gorge. This is so needed if we are to guide the future of the National Scenic Area. We hope that you will have added to the management plan: a focused climate action plan which is so far lacking. | See 6. |

| | Page | Topic | Comment | Response |
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| 1 | 391 | Econ | 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.<br>GMA Policy 6.E., Replace with:<br>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. | 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. |
| 2 | 391 | Econ | GMA 6.F. Replace with;<br>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. | 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. |
| 3 | | Econ | 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. | 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:<br>"1. Protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing urban areas.<br>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, cultural, recreation, and natural resources of the Columbia River Gorge." |

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| **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<br>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." |
| **7** | **391** | **Econ** | 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. | 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. |
| **8** | **392** | **Econ** | 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. | 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. |

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| **9** | **389** | **Econ** | 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]: "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." | 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. |
| **10** | **391** | **Econ** | 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. | 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. |
| **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. *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).* | 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." |

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| **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**<br>**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:<br>"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. |
| **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. |

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| **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. |

| | Page | Topic | Comment | Response |
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| 1 | | Equity | This plan needs to strive to be anti-racist. Here are some ways that we can reflect more anti-racist approaches and plans.<br>I'll include a link for 16 words and definitions for the anti-racism journey<br>https://medium.com/@reneecherez/16-words-and-definitions-to-kickstart-your-anti-racism-journey-bd1100656b0d<br>1. History- the history section is very white-sided and written from the white person point of view of history.<br>Recommendation is to make sure the history includes First Nation and Indigenous history and be led from the perspective of all communities that have been excluded and included on this land. Genocide of First Nation communities happened on this land, Blacks were expelled and not legally allowed to live on this land - this needs to be included in the history of the area. This also includes Black, Hispanic/Latinx and other cultures of color that have been included and excluded and exploited within the Columbia River Gorge.<br>Reference links below:<br>https://www.confluenceproject.org/library-post/tribes-of-the-columbia-river-system/<br>https://calendar.eji.org/racial-injustice/jun/26 | At its September 2020 meeting, the Gorge Commission approved a Diversity, Equity, and Inclusion (DEI) statement in Part IV: Administration, Chapter 1: Gorge Commission Role. Policies 1 and 2 direct the Gorge Commission to develop a Diversity, Equity, and Inclusion Plan to address equity in the implementation of the Management Plan, Gorge Commission operations, and policy decisions. Review of the Management Plan's history section is a topic of further exploration as part of the DEI planning effort. The Gorge Commission is committed to learning from and engaging with diverse communities in this work. As a first step, the DEI statement includes language about Oregon's history of exclusionary laws and constitution. The new text is: "The Commission acknowledges and regrets Oregon's history of structural racism including its exclusionary laws and its 1857 Constitution barring Black citizens from residing in Oregon, voting, owning property, or entering contracts." |
| 2 | | Equity | 2. Land Acknowledgement -<br>Recommendation: as a government body that is tied to the white supremacist system overseeing land that was stolen from Native and First Nation folks, we need to start all our work with land acknowledgements to acknowledge and heal from the history of land management in the area. | A brief land acknowledgment is included in the Diversity, Equity, and Inclusion statement. The Gorge Commission is learning more about land acknowledgment and how this practice may be incorporated at its meetings. |

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| **3** | | **Equity** | 3. We need an Equity Plan. At this point no document that is written by our government institutions should not include an equity plan. This needs action steps to redress the hundreds of years of systemic racism and white supremacy that has excluded communities of color from the area. It also needs to talk and create steps about how white supremacy and systemic racism is being dismantled within the management plan. For some good references check out https://www.showingupforracialjustice.org/white-supremacy-culture-characteristics.html. Recommendation: Make this a regular agenda item and encourage staff to support a team that can lead this work. This team should be reflective of our community and incentive the participation of local folks. As a Person of Color I know that committees and open conversation can be stressful and feel unsafe. We need to create a safe space that allows for participants to share truthful experiences. There are many local groups who are doing this work such as The Next Door, Inc., Latinx en Accion, Abogadores de la Comunidad, Radio Tierra KZAS, WorkSource Columbia Gorge, One Community Health – we should collaborate to work on this plan together. 4. Every piece of this management plan needs to include more around racial justice, because racial justice is environmental justice. Recommendation: I invite you to explore these texts to help shape arguments around edits that need to happen to this plan. https://www.nytimes.com/interactive/2020/06/05/climate/racism-climate-change-reading-list.html?fbclid=IwAR3xm3nJO08kQqo-U2600hB3tmV917JaAIAveW7U34BMAj6riQaEApjtucY https://www.opb.org/news/article/oregon-northwest-racism-outdoors-nature-hiking/?fbclid=IwAR1nSLYbBiwFvAS-spL3ao2l_uoj20SNUhxqfN0bRTdyB-A8BFl9I3LZ1Ik https://www.opb.org/news/article/black-birding-week-oregon-bipoc-conservation/?fbclid=IwAR1gGrJQnarG6ymUzo5vZelpJy0Di9dFGk-U5-tNc0gDS_CXGobDopO61po https://e360.yale.edu/features/unequal-impact-the-deep-links-between-inequality-and-climate-change?fbclid=IwAR1hOZh4SrbWD09WSAXCCfS8IdxlVr_HgPodlKiHGOc4awHaqVm2xpByT9k | In the Diversity, Equity, and Inclusion statement, policies 1 and 2 direct the Gorge Commission to develop a Diversity, Equity, and Inclusion Plan to address equity in the implementation of the Management Plan, Gorge Commission operations, and policy decisions. Engaging under-represented and marginalized communities in the Columbia Gorge region is essential to this effort. The Gorge Commission appreciates the resources shared in this comment letter and will explore these during the DEI planning process. |

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| **4** | | **Equity** | At this point no document that is written by our government institutions should not include an equity plan. This needs action steps to redress the hundreds of years of systemic racism and white supremacy that has excluded communities of color from the area. It also needs to talk and create steps about how white supremacy and systemic racism is being dismantled within the management plan. This work needs to be done with communities of color both in Portland/Vancouver and the Gorge, as may of the communities of color in the cities have not been allowed to be part of there gorge and those in the gorge have been moved, relegated and oppressed within the community. For some good references I will bring us back to characteristics of white supremacy culture. | See 3. |
| **5** | | **Equity** | History section needs to be re-written. Currently this history is from the white perspective and it is not ok for us to white- center our history, this is not acceptable as we need to center our history in all people and hold ourselves to accountability to the realities of experiences and histories for all involved. We need to include First Nation and Indigenous history and be led from the perspective of all communities that have been excluded and included on this land. Genocide of First Nation communities happened on this land, Blacks were expelled and not legally allowed to live on this land - this needs to be included in the history of the area. Japanese internment camps and Hispanic deportation prisons are part of this history. This also includes Black, Hispanic/Latinx and other cultures of color that have been included and excluded and exploited within the Columbia River Gorge. | See 1. |
| **6** | | **Equity** | Include a Land Acknowledgment. As a government body that is tied to the white supremacist system overseeing land that was stolen from Native and First Nation folks, we need to start all our work with land acknowledgments to acknowledge and heal from the history of land management in the area. | See 2. |
| **7** | | **Equity** | Need an Equity Plan. At this point no document that is written by our government institutions should not include an equity plan. This needs action steps to redress the hundreds of years of systemic racism and white supremacy that has excluded communities of color from the area. It also needs to talk and create steps about how white supremacy and systemic racism is being dismantled within the management plan. This work needs to be done with communities of color both in Portland/Vancouver and the Gorge, as may of the communities of color in the cities have not been allowed to be part of there gorge and those in the gorge have been moved, relegated and oppressed within the community. For some good references I will bring us back to characteristics of white supremacy culture. | See 3. |

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| **8** | | **Equity** | I am writing to comment on the need to include racial justice in the updated Management Plan. The Management of natural resources in the Columbia Gorge involves a current and historical exploitation of Indigenous people both in the 1961 Columbia River Treaty as well as land management today. It is important to make sure the current Columbia River Gorge Management Plan is anti-racist. The draft as it stands is lacking in acknowledgement and planning around racial justice. Here are my comments for adjustment: - Intro (pg 11-12) should include conversation about Indigenous tribes, sacred and historical sites and influence of Indigenous tribes on National Scenic Area Act. - History section should include First Nation and Indigenous history as well as exploitation of resources and genocides that occurred on this land. History section should also include Black, Hispanic and other cultures of color that have been included and excluded and exploited within the Columbia River Gorge. - The Management Plan (perhaps in the introduction section) should include a Land Acknowledgement that the land being managed was stolen from Native and Indigenous people so this history can be recognized and understood by those now managing and utilizing the land. - The Management Plan should include an Equity Plan to address how this government institution and management of resources will include communities of color who have historically faced systemic racism and exclusion. Are any of the commissioners involved in the plan Black, Indigenous or persons of color? If not, will the Commission consult/seek advice from community members who are able to give perspective on ways to make the Management Plan racially just? - The Residential Land chapter (pg 259) should include mention of the inequities in housing and effects of industrial pollution on communities of color and increased levels of toxic and hazardous waste. GMA Goal 4 should also mention these injustices and include items of action to prevent. (See http://greenaction.org/what-is-environmental-justice/) In summary, the Management Plan needs to be Anti-Racist and the current draft is completely lacking in addressing the historical and present system racism. Racial justice and environmental justice are inarguably linked and need to be included in any plan to manage natural resources. | See 1, 2, and 3. Development of a Diversity, Equity, and Inclusion Plan, including engagement with tribes and others, will help the Gorge Commission build understanding of historical and current inequities that will inform what changes are needed to the Introduction, Residential LUD section, or other parts of the Management Plan. |

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| **9** | | **Equity** | How and why does this specific policy impact people of various race and ethnicity, economic disparities, including physical and mental health impacts. There must be a place for this in your decision making as well as acknowledgement of the “winners and losers” the policy enables. Because even the most well intentioned decisions will be detrimental to someone. I want to know these things and don’t believe anyone should have to arduously page through documents have to seek that knowledge.<br>It’s vital to acknowledge how vulnerable populations are losing or not even considered “stakeholders” in these important decisions. What has this board done to address the true costs of this policy. Who loses and what is the actual cost of that loss? I believe this deserves the front page of policy making and ask you to stop and re-evaluate these questions before final decisions are made to insure you were doing everything you can not to cause further disparities already so obvious in our Columbia Gorge communities. | The Gorge Commission recognizes the need for policy analysis through an equity lens that incorporates race, ethnicity, economic status, and physical and mental health. Policies 1 and 2 in the Diversity, Equity, and Inclusion section of Part IV: Administration, Chapter 1: Gorge Commission Role direct the Gorge Commission to develop a Diversity, Equity, and Inclusion Plan to address equity in the implementation of the Management Plan, Gorge Commission operations, and policy decisions. Policy 2 directs the Gorge Commission to engage under-represented and marginalized communities in its work, including those who are most vulnerable to impacts of policy decisions and have not historically been engaged in planning efforts. |
| **10** | | **Equity** | I am hoping that when you add the equity section in the gorge plan, that you include American Indians in it. In 1855, several tribes were displaced and promised money for that displacement. Since 1855, one tribe has been compensated. Can we truly prove equity by paying our obligations? | In the Diversity, Equity, and Inclusion statement, the Gorge Commission acknowledges that the National Scenic Area is located within the ancestral territories of Indigenous peoples who protected these lands since time immemorial and that European settlers and their governing authorities took Indigenous land and resources within this region by unjust and inequitable means. As a first step in the Gorge Commission's efforts to develop a Diversity, Equity, and Inclusion Plan, this statement is not comprehensive of all issues and specific historical details. The displacement and compensation of tribes is one topic that may be further explored as part of the DEI planning effort. |

| | Page | Topic | Comment | Response |
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| 1 | | Land Use | Oppose and Vote NO on Gorge Commission Policy Plan (Gorge 2020)<br>Certain Gorge residents recently received an alarming notice in the form of a mundane, postcard which declared curtly: “The Columbia River Gorge Commission has proposed amendments to the National Scenic Area Management Plan which may impact the value and use of your property and future development in your community,” which include “changes to land use regulations for private properties . . . that may restrict future uses.” Apparently a simple vote can wipe out all of a landowner’s rights as well as up to 100% of his property value. But that’s not the way it’s supposed to be according to Ernest Istook: “Our economic freedom is founded on individual property rights; government should never be permitted to take those away.” If you’re so inclined, do not try to manipulate individual property owners out of their rights. Vote NO!<br>And Mike Klepper said, “The only legitimate purpose of government is to protect the lives and property of its citizens.” Over a century ago President and chief justice William Howard Taft showed incredible 21st century insight when he wisely observed, ”No tendency is quite so strong in human nature as the desire to lay down rules of conduct for other people.” “We can't have a decent government unless those in power exercise self restraint.” Please use a little self restraint. Vote NO! He also said, ”The world is not going to be saved by legislation.” “Next to the right of liberty, the right of property is the most important individual right guaranteed by the Constitution.”<br>Other presidents have been equally explicit: “Property is surely a right of mankind as real as liberty.” --John Adams<br>“Ultimately property rights and personal rights are the same thing.” --Calvin Coolidge<br>“The rights of persons, and the rights of property, are the objects, for the protection of which Government was instituted.“ --James Madison<br>Long before 1776, John Locke’s writings greatly influenced the Declaration of Independence, as well as our American revolutionaries when he stated, “Government has no other end, but the preservation of property.” If you have the power to vote on the Gorge 2020 policy, Vote NO. It’s your duty! But in frustration, Locke also said, “Too many people don't care what happens so long as it doesn't happen to them . .” We have no personal interests in the Columbia River Gorge, but we are very concerned for the future of our fellow Wasco county landowners as well as all private property holders in greater Oregon and Washington. You see, we believe, “An attack on one (in this case by the gorge commission) is an attack on all.” Please just say no! Vote against any and all policy that has the effect of: limiting the opportunities and /or uses any landowner currently enjoys on one’s private property, and/or; reducing the value of even one private landowner’s property through the power of your decisions. | Gorge Commission staff has been conducting public outreach about Gorge 2020 through emails, press releases, community outreach meetings, radio talk shows, public notices, etc. since October 2016. Changes to the Management Plan that were proposed as part of the four focus topics, two technical revision topics, and the Climate Change chapter were open for public comment and discussion at Gorge Commission meetings over the last four years. If any landowner is adversely affected by new restrictions in the Draft Management Plan, the Gorge Commission can review those on a case-by-case basis at the time a permit application is submitted. |
| 2 | | Land Use | Timber Harvest: Timber harvesting should be prohibited within the NSA, at least clear cutting! Recent years have seen devastating and highly visible clearcuts. The NSA is not very wide - surely lumber companies can be restricting from harvest within the area. | Forest practices, where allowed, are allowed outright, according to the Act's savings provisions. The Management Plan regulates land use and development in the National Scenic Area (NSA). Forest management on the vast majority of forested lands in the NSA is designed and carried out by the U.S. Forest Service and other landowners. The Act protects lawful application of state Forest Practices Acts on private forest lands. Forest practices are allowed without review on all NSA General Management Area lands except for Open Space and Agriculture-Special. The Management Plan does allow and support proactive forest health and fuels reduction activities, and it requires fire protection measures for new development on forest Land Use Designations. |
| 3 | | Land Use | My concern, today, is the outright contempt that some on the Gorge Commission have, for those of us who live here. “Protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner consistent” with the first purpose of the Act. Your draft plan revisions eliminate the rights of rural property owners to use their property for uses that are, in fact, permitted under Oregon law. | As an interstate compact agency, the Gorge Commission is not required to align with Oregon or Washington state laws or land use goals. |
| 4 | | Land Use | I moved to Oregon 24 years ago and one of the most significant attractions to me was the fact that the state had statewide land use goals. The Commission needs to do all it can to work in alignment with those goals. Probably the most important goal involves preventing urban sprawl while protecting forest and agriculture lands. The Commission needs to act in the strongest possible fashion to live up to these goals throughout the Gorge. This is not only a national resource but an international one that we need to protect at the highest possible levels. | See 3. |

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| **5** | | **Land Use** | "The Columbia River Gorge Commission has proposed amendments to the National Scenic Area Management Plan which may impact the value and use of your property and future development in your community," which include "changes to land use regulations for private properties . . . that may restrict future uses." This is written on a postcard sent out to property owners in the Columbia Gorge National Scenic Area. How can this be OK? People that have private property that they have spent years paying taxes and developing. The Fifth Amendment of the US Constitution protects the right to private property in two ways. First, it states that a person may not be deprived of property by the government without "due process of law," or fair procedures. I hardly think that the way The Gorge Commission is going about it is a fair procedure. If you would like to lockdown the use of the property and devalue the property then The Gorge Commission needs to reimburse the property owner the cost of future use and value. This is clearly proof of unconstitutional takings. I hope that you will review Oregon's Measure 37 ORS 195.305 which allows property owners whose property value is reduced by environmental or other land use regulations to claim compensation from state or local government. If the government fails to compensate a claimant within two years of the claim, the law allows the claimant to use the property under only the regulations in place at the time he/she purchased the property. Will these people be compensated for future value and use of their property once the amendments are passed? I would think not so this will be a unconstitutional taking on the state and federal level. Please Vote NO on Gorge 2020 | See 1. |
| **6** | | **Land Use** | Government power should never be unlimited, it must not restrain our basic fundamental freedoms/Rights<br>VOTE NO ON GORGE 2020 | See 1. |
| **7** | | **Land Use** | The changes proposed to the land use designations will eliminate property owners rights to use their land for currently allowed uses, such as bed and breakfasts, agrotourism and such. By the way, current Oregon law actually allows that use and it would seem to me it would fit right in with the original intent of the Act. | At its August 2020 meeting, the Gorge Commission passed a motion to retain Bed and Breakfast language in the Draft Management Plan. The current allowances for Bed and Breakfast Inns will remain in the Management Plan. |
| **8** | | **Land Use** | I wrote a letter to the commission last fall and others also did. I'm part of two groups working on homelessness and low income housing. My question was about the District 21 property above 10th street that is currently unused. Or only lightly used. We inquired about having the Gorge overlay removed on the 17 acre parcel. Allowing it to become used for a Homeless mission, low income housing, a skill center, a couple types of schools. One a supernatural ministry school, and maybe a elementary school of a charter type. The plans also include area to be for growing of food and small orchard crops to be used in the programs and for training. Our community very desperately needs this. Housing for low income is the primary problem. Even keeping needed workers from locating here. I never received any kind of answer. I was told now was the time to pursue this and these topics had been being discussed for a few years at the commission. Yes I have talked to Angie Brewer about it. So is there some kind of answer and is the call coming up a place to send in comment for it? | This is outside the scope of Management Plan review. |
| **9** | | **Land Use** | I'm sure the people at the scenic management area are doing the best they can, but I feel they have strayed from their original mission in several ways. Additionally, from a pure business management stand-point, I think they are taking on far too much regulating and policing with no one to do it but you and the other county planning teams. In many cases, while the management area required some special rule sets, it should not be out of sync with the respective state laws and regulations unless there is a very good reason. I do not believe the scenic management commission needs to be involved with grants and other financial funding activities offered by states, counties or the federal government. I don't think the scenic management commission needs to be, and should not be, involved with designated urban area activities. These are complicated enough as they are. Further, they appear to favor absolutely no future growth of urban growth boundaries which is patently absurd; all should work together now to determine where they are going to be. Finally, I would ask that if appropriate the enforcing planners of the respective counties agree on just what they are going to enforce and do it with an even hand. I have maintained my tasting area at 1000 sq. ft for 16 years while at least 6 new wineries have been built in the scenic management area with 2000 – 3500 sq. ft of tasting area years after I began operation. May I petition to come up to the average of the others? Or just what is possible here? | See 3. Also, see responses to comments in the Urban Area Boundaries section. |

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| **10** | | **Land Use** | Agri-tourism activities that are allowed under state laws are prohibited here. | As an interstate compact agency, the Gorge Commission is not required to align with Oregon or Washington state laws or land use goals. The Gorge Commission has not approved any amendments that will limit existing allowances for commercial uses and events. At its September 2020 meeting, the Gorge Commission approved adding "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 the October 2020 Commission meeting, but stated that it does not want to allow commercial events at these venues. |
| **11** | **347** | **Land Use** | Prohibitions for bed and breakfasts and inns in an area that needs additional rooms for its primary tourism and agricultural businesses. | See 7. |
| **12** | **354** | **Land Use** | Commercial event guidelines need to universally require a lawful winery, brewery, cidery or spirits license. There is no reason to distinguish between these businesses, they are all agriculturally based, the regulation of commercial events is a mystery to me, considering that existing noise ordinances curb any reported problems. The idea of petitioning for the right to operate my business every 2 years with assorted proofs is upsetting to me. And who is going to do it? | Modifications to commercial events guidelines were proposed by Commissioners as an amendment, but this was not brought as a motion to the Gorge Commission for discussion. Staff will not make further edits to these guidelines. |
| **13** | | **Land Use** | Columbia River Gorge National Scenic Area Act sets forth requirements that the Columbia Gorge Commission must satisfy when revising the Management Plan. We are aware some standards are not being met, in particular, #9 which states: Require that mining operations, and the reclamation of mined lands, take place without adversely affecting the scenic, cultural, recreation and natural resources of the scenic area. Currently, gravel extraction is occurring in the neighborhood of the Nancy Russell Overlook without appropriate approvals. We encourage the Gorge Commission to enforce protections of this special place. | Development of mineral resources is allowed by the Act, and the Management Plan includes specific guidelines to prevent impacts to protected resources. |
| **14** | | **Land Use** | I built my home and have made it my primary residence in the west end of Skamania County for over 30 years. In my own area, neighbors, friends, and I have witnessed blatant inattention to county codes and ordinances regarding land use, additions, and inspections, which, besides overuse, greatly increases the risk of wildfires. An employee of Skamania County's Planning Dept. has conveyed to me that land use enforcement is not given a high priority. The NSA regulations are quite extensive; neighbors should not be turned against neighbors attempting to interpret and report violations. Please severely limit new dwellings and prioritize adequate permits and inspections to minimize risk to humans, wildlife, and our beautiful forests and waterways. It is disheartening that, for example, there are numerous "visitors" living in "temporary" motorhomes, completely disregarding NSA lot size requirements, and often dogs run at large, harassing wildlife and disturbing fragile areas, without a single enforcement officer available. | At its August meeting, the Gorge Commission approved an amendment to add a land use policy related to Firewise standards in GMA Residential and Agricultural lands: "The reviewing agency shall provide information on Firewise standards to landowners at the time of application. Landowners shall be encouraged to incorporate Firewise standards in their proposal as appropriate and as consistent with the resource protection provisions in the Management Plan." |
| **15** | | **Land Use** | Perhaps the county could require a NSA informational packet be acknowledged by signature upon closing for all land sales or distributed at the time of ownership filings. | County planning departments are welcome to implement these measures. |

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| **16** | **347** | **Land Use** | We wish to submit the following in response to the proposed amendments to the section titled OVERNGHT ACCOMODATIONS, page 347 & 348. We propose that overnight accommodations SHOULD NOT BE ALLOWED on properties that require the use of roads not maintained by the county, unless there is a legal agreement by all property owners on these roads to allow such usage. The infrastructure on a shared private road is not capable of supporting commercial enterprises, and does so to the detriment of all the other users. This is based on experience over the last five years of an illegal Airbnb operating at 2105 Rattler Ridge Road. Rattler Ridge Road is a one-mile private road that serves 10 houses. Recently several complaints have been filed with the Wasco County Planning Commission regarding the Airbnb and the increased usage on the road by unknown vehicles. The final straw was the continued operation of the Airbnb in March and April during the Covid-19 shutdown. There have been multiple problems including guests trespassing on neighboring property, neighbor's pets injured by guests cars and increased wear and tear on the road by people not knowing how to drive on gravel. At this point the owner of the Airbnb has not contributed to or participated in road maintenance for at least two years. Occupancy in the summer is very high – for the upcoming month of July the Airbnb is already booked for 27 days. This type of commercial usage seems antithetical to the mission and goals of the scenic area, and has been detrimental to the spirit of neighborhood cooperation and tranquility that used to exist, and still does in a diminished capacity on this road.<br>Issues:<br>GMA Guidelines<br>#A How do you enforce the 90 room nights per year?<br>#F Allowing three employees per accommodation only adds to the wear and tear and congestion on a private road. | Staff provided the Gorge Commission with all comments on this topic as well as a staff report summary of the comments. The Gorge Commission proposed changes to the draft guidelines for Overnight Accommodations as an amendment, but this was not brought as a motion at the August 2020 Commission meetings. Staff will not make further edits to the draft policy. |
| **17** | | **Land Use** | [Draft Plan] increases the number of land use regulations sprinkled amongst its 500 pages, sometimes oddly specific, but with their specificity arbitrarily adjusted. Each of these regulations will prevent some aspect of human activity, frustrating ambitious residents. Perhaps more-frustrating to the land user are dozens of imprecise regulations also embedded within the text of the Draft Plan, many employing the phrase "maximum extent practicable." Each proposed edit to land use regulations further-burdens the land user. Each of these regulations has an unclear cause-and effect<br>linkage to either of the ACT's purposes. | Comment is not related to any specific amendments to the Draft Management Plan. |
| **18** | **347** | **Land Use** | I would like to add my voice to those who wish to prohibit overnight accommodations on private roads, use of which negatively impacts other residents on those roads. The unwanted effects of extra traffic and hundreds of out-of-town guests with no investment in this small country neighborhood include road degradation, drivers unprepared for foot or pet traffic (we have no sidewalks or road shoulders), guests becoming lost and driving into neighbors' yards late at night with lights glaring and horns honking, to mention a few. Also, there is no mention in your guidelines about requiring additional protections by the owners against wildfires in this area served only by a volunteer fire department. Certainly the likelihood of such events is increased by the additional traffic and activity. | See 14 and 16. |

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| **19** | | **Land Use** | I am 100% against any type of approval or changes to the Columbia River Gorge National Scenic Act during the COVID 19 times. I have emailed and have called he Skamania County Planning De-Department with my concerns with the new guidelines loosening the requirements to build in the Scenic Area. The national Scenic Act required Skamania County Planning to promote growth in the Small rural Center of Skamania and Corbett Oregon. There has not been a new business in Skamania in thirty two years that I have lived here in Rural Skamania. Great job of promoting growth Skamania County Planning Department. I have spent thirty years trying to develop my properties and sell them for home businesses and Residences. The Skamania County Planning Department has never I mean never promoted one ounce of effort in following the Rural center guidelines of the Scenic National Scenic as far as Urban or rural growth is concerned. It is easier for the planners to just say no or maybe in five years of us dinking around we might be able to get off our butts and look into it. It is an absolute Joke. Last week I had a potential buyer that wanted to put a large Animal Veterinary Clinic on one of my Five Acre Parcels and his wife wanted to put a small animal veterinary clinic on another one of my parcels,. My Parcels are Zoned Residential Rural Center R =5 Skamania. The Skamania County Planning Department Planners Mike Beck, Senior Planner and Alan Peters Planning informed my potential buyers that this could never happen in Residential R5 classification, and that they could not even apply for Veterinary clinic on my properties. The Scenic Act says that the Skamania and Corbett Rural center's are set as cluster area's for businesses and residents to gather/ In the Rural Center areas there should be businesses to supply the needs of the community. Since the National Scenic Act did not set up any Commercial Parcels of land zoned more than 1 Acre Commercial. The Skamania Planning Department told my buyers without me knowing about it. That no businesses are allowed on my rural residential land. In fact The Skamania Planning Department informed me that there is no such thing as residential Rural center property in Skamania. I spent $150,000 short plating nine lots in the last thirty years in Skamania. The short Plats are all approved by the Skamania County planning Department and all of them say that they fall under the Rural residential screening requirements of General Management R -5 zoning of rural Center Skamania, The Skamania Planning Department now say I am required to screen on all of my properties from key viewing areas How do you screen in the rural center of Skamania. The planning Department has no intention of ever letting anything be developed in Skamania without a lawsuit. the planners are crippled by Red tape and are not about to ripple the water, I can not get any answers on anything from the Skamania County Planning Department due to Covid 19. You would think that a government agency would have someone answering the phones and emails while paying the planners tax payers dollars for sitting at home on a paid vacation,. I want answers and I strongly feel if any of these new Gorge Act Guidelines are put in place, the residents of the gorge are going to be paying the price for it. The Government is not going to promote growth in Rural areas like yours and mine and as the National Scenic Act Mandates. There is not money in it for the Government. So why do anything. They will continue doing nothing. That is why they are force feeding the Us people the New Scenic Act Guidelines In the middle of COVID 19 Pandemic. The Government wants to loosen the National Scenic Area guidelines while the US is in a low and shove it down our throat whether we like it or not. This way people will apply for development of their private land that the Us Forest Service and other government agencies have not had a chance to purchase yet. Then they will deny you application and offer two cents on the dollar for your land, If you refuse to sell or they refuse to buy they will put the land in General management, Your Taxes will triple and the Governing Agency still get their money The Planning Departments and the government are walking us like sheep to slaughter I myself have had an absolutely had belly full of new rules that are set up to hurt the residents of the Gorge. Rules that don't have one thing to do with the good of the Gorge or the good of the National Scenic Act. These rules are coming from a bunch of developers realtors and people from California and Seattle that don't even live in the Gorge. Enough is enough We needed a large animal Veterinary in the Gorge. Obviously the Planning Department cares less about the needs of the residents of the Gorge. | Comment is not related to any specific amendments in the Draft Management Plan. |
| **20** | | **Land Use** | Am writing about the proposed land use change to gorge commission planning. Why do they want to change anything? They already restricted the use of private property that people own and without their permission. They probably plan on restricting use of public property also. Putting additional restrictions on private property is unconstitutional and I'm against it. Please don't allow this to happen. | See 1. |
| **21** | | **Land Use** | Think conservation AND restoration over urbanization and overuse<br>Envision how the Columbia looked to Lewis and Clark (salmon... trees... no dams) and how we can restore some of it... rivers, watersheds, let trees grow for a change, etc. | Comment does not relate to any specific amendments in the Draft Management Plan. |
| **22** | | **Land Use** | Stop logging when possible... and ensure trees are replanted when you can't | See 2. |
| **23** | | **Land Use** | In submissions received by the Gorge Commission in March 2017 for Gorge 2020, fire departments and planning departments throughout the Gorge urged the Commission to emphasize Firewise Communities Program best practices in the updated National Scenic Area Management Plan, and encouraged the use of Firewise guidelines for construction, access, defensible space, and maintenance of homes built in the Gorge. I also urge the Commission to emphasize Firewise Communities Program best practices in the updated National Scenic Area Management Plan, and encourage the use of Firewise guidelines for construction, access, defensible space, and maintenance of homes built in the Gorge. | See 14. |
| **24** | | **Land Use** | Guideline 2: “new buildings adjacent to…” Unclear why this buffer would automatically apply if a natural or created vegetation barrier, berm or terrain barrier exists, which allowed a path for a reduced buffer width. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **25** | **207** | **Land Use** | Guideline 1.G: maintains an existing standard that requires use of fire-resistant roofing materials, including metal. However, under the Scenic Guideline 10, page 42 building exteriors must be composed of materials that are non-reflective or with low reflectivity. These standards conflict. It is recommended that Guideline 1.G be modified to use the term “stone-coated steel or similar” instead of metal. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **26** | **231** | **Land Use** | Guideline 1.H: it lists “community parks and play…..” according to prior GC staff, this Society is now known as the “National Recreation and Park Assn” and they no longer set such standards.. Recommended that this provision either be modified to say only “community parks and playgrounds” without reference to other standards or updated to reflect current accepted standards. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |

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| **27** | **266** | **Land Use** | 1.I: it is recommended that this provision be modified to allow overnight accommodations in any residential designated area and not just those designated as 5-acre and 10-acre Residential | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission proposed changes to the draft guidelines for Overnight Accommodations as an amendment, but this was not brought as a motion at the August 2020 Commission meetings. Staff will not make further edits to the draft policy. |
| **28** | **266** | **Land Use** | Guideline 1.A: There appears to be a contradiction between the existing language that allows the repair and maintenance of trails and roads with the new language that excludes trail and road improvements. | Staff reviewed the guideline this comment refers to and determined to not edit the language in the Draft Management Plan. |
| **29** | **314** | **Land Use** | Allow development reviews to be streamlined by increasing the list of uses that are either allowed outright or subject to an expedited review… especially for those proposed within the recognized "developed" landscape setting. Within this setting, the potential for significant resource impacts are limited given the nature of the setting. Safeguards included within the expedited review process will ensure that projects not conforming to the resource protection requirements are subject to the standard review process. Most NSA applications that Hood River County review involve property located within the developed setting located immediately west of the Hood River Urban Area. In most instances, development reviews could reasonably occur using the existing expedited review process without compromising protected resources. | Proposed as amendment at the 8/12/20 Gorge Commission meeting, but the motion was withdrawn. Staff will not make further edits. |
| **30** | **310-321** | **Land Use** | Examples of uses/structures that could be considered as either outright allowed or subject to expedited review:<br>Outright allowed:<br>-Forest fuel treatment/reduction activities<br>-Accessory buildings 200 SF or less<br>-Collocation of antennas on an existing wireless transmission tower that does not exceed the height of the tower.<br>Expedited Review:<br>-Accessory buildings and structures up to 1,500 SF or less, especially within a "developed landscape setting"<br>-"In kind" building replacements, especially when destroyed or damaged by a disaster.<br>-Highway projects occurring within the recognized road prism and conforming to specified standards, such as the I-84 Corridor Strategy Guidelines. | Proposed as amendment at the 8/12/20 Gorge Commission meeting, but the motion was withdrawn. Staff will not make further edits. |
| **31** | | **Land Use** | p.344 “dwelling structure” assume this applies to tiny homes and RVs, but unclear.<br>Recommendation: Add new definition. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **32** | **344** | **Land Use** | Overnight Accommodations:<br>- allow in all Residential LUDs<br>- define "room nights"<br>- define "permanent residence"<br>- reconsider 2-year renewal | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission proposed changes to the draft guidelines for Overnight Accommodations as an amendment, but this was not brought as a motion at the August 2020 Commission meetings. Staff will not make further edits to the draft policy. |
| **33** | **347** | **Land Use** | Expand list of uses allowed outright and expedited review (see letter for uses suggested) | Proposed as amendment at the 8/12/20 Commission meeting, but the motion was withdrawn. Staff will not make further edits. |
| **34** | **318** | **Land Use** | p. 355: should be modified to allow for ministerial or expedited review to renew approved commercial event sites instead of a new application, which involves unnecessary staff review.<br>p.356: precludes permit renewal if the allowed event site has a violation or fails to file yearly report. Is this intended as permanent ban? It seems unnecessary to eliminate an otherwise valid site due to a minor infraction.<br>RECOMMENDATION: allow a minor renewal process, but a full review in the case of a permit violation. Some language could be provided to permanently ban a facility due to severe or habitual violations. | Proposed as amendment at the 8/12/20 Commission meeting, but the motion was withdrawn. Staff will not make further edits. |
| **35** | **355** | **Land Use** | Glossary definitions of "dwelling unit" and "accessory building" also see Hardship Dwelling (“dwelling structure”) should be modified to clarify level of residential improvements that can be allowed within. References “a” full bathroom- not intent to limit one full bath per dwelling unit? And, is it intent to limit dwelling unit to one kitchen?<br>Recommendation: Dwelling Unit. “Facility needs may include one food preparation area or kitchen and at least on bedroom and full bathroom”.<br>Also implies that a building containing a bedroom and a full bathroom is not to be considered a dwelling unit since it does not also contain a kitchen. If not a dwelling unit, then is must be an “accessory building”. If guest quarters and ADUs are not intended to be allowed, then should be modified to minimize or prevent such amenities from occurring within detached accessory buildings. Need clearer direction. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **36** | **465<br>472** | **Land Use** | Guideline 2.D. Consider modifying to say "… not encroach any further into the required setback." | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |

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| **37** | **357** | **Land Use** | A major question arose during discussions of the proposed Hood River-White Salmon Bridge Replacement project: whether the visual quality objectives under the Columbia River Bridge Replacement section of the Plan were to be applied alone or together with other scenic guidelines found elsewhere in the Plan. It was assumed that that standard scenic guidelines would not apply. Recommendation: If this is true, provide language under this section to clarify that the visual quality objectives listed under the Columbia River Bridge replacement section of the Management Plan are the only scenic standards intended to be applied to bridge replacements crossing the Columbia River. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **38** | **366** | **Land Use** | Ag Buildings: Consider adding additional documentation requirement. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **39** | **344** | **Land Use** | New GMA Guideline 1.A. on page 347 of the plan allows overnight accommodations within a legal single family dwelling in certain zones for up to 90 room nights per year. It would be RECOMMENDATION: helpful if an explanation could be provided for how counties should calculate a room night.<br>Room nights may be a difficult metric for counties to effectively investigate and enforce due to limited compliance resources and because it might be difficult for counties to determine how many rooms may have been rented within a dwelling in the past. Multnomah County encourages the Gorge Commission to consider whether additional information should be required to be submitted by the applicant either as part of the application, or as a condition of approval, to ensure the room night per year limit will not be exceeded. Or, set a limit on the number of rooms which can be rented at one time in a dwelling and highlight this for the Commission's consideration to determine if a limit should be established to ensure any temporary rental component remains accessory to the primary use of a structure as a single-family dwelling. | See 16. |
| **40** | **347** | **Land Use** | Consider adding language clarifying the role of the Forest Service and Counties when a project is proposed on federal lands by a private or non-federal agency. | Guideline 4 in Chapter 7, Review Uses describes the Forest Service Role. Not proposed as an amendment by the Gorge Commission. No changes were made to the Draft Management Plan. |
| **41** | **357** | **Land Use** | Overnight Accommodations:<br>- At a minimum they should be allowed in Residential 2 zones in addition to R-5 and R-10.<br>- Homeowner occupancy should not be required during rentals. Instead, a local manager or contact person should be available at all times to respond to guest inquiries and complaints.<br>-Monitoring and enforcement can occur without the need for the renewal of an NSA permit every 2 years. Allow counties to develop their own compliance monitoring programs or permit systems that can be renewed through a more ministerial process.<br>-The 500 foot notice is redundant with required public notice. | See 16. |
| **42** | | **Land Use** | Hardship Dwelling Guideline:<br>-Proposed revisions would allow for the use of a "dwelling structure" in addition to mobile homes already allowed. Given the temporary nature of these hardship dwellings, these types of structures are inappropriate and may lead to compliance issues. Mobile homes can be costly and difficult to remove, and it is not clear what is meant by a "dwelling structure" that does not require a permanent foundation. Instead, use of RVs or tiny homes should be allowed as hardship dwellings. These self-contained units do not require foundations and can be easily removed from a property once a hardship no longer exists.<br>-Hardships arrive with little advance notice and should not require full development reviews. New hardship dwellings and subsequent renewals can be approved under the expedited review process. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **43** | **347** | **Land Use** | Home Occupations and Cottage Industries, these uses have traditionally distinguished between business that provides an offsite service that is managed from the residence (e.g. landscaping companies) and businesses that produce a product to be sold commercially offsite. Past examples of cottage industries approved in the NSA include small scale denture production and small scale gelato production. By removing the "industry" element of this use, makers will be out of compliance; artists who sell their work could be captured in this category. Please add it back in and revise to more clearly arrive at the intended outcome. | Proposed by the Gorge Commission as an amendment but not brought as a motion. Staff will not make further edits to the draft policy. |
| **44** | | **Land Use** | overnight accommodations (also known as short-term rentals) in GMA 5-acre and 10-acre Residential land use designations is inconsistent with the Residential Designation Goal 1: Maintain the character of existing residential areas. | Proposed by the Gorge Commission as an amendment but not brought as a motion. Staff will not make further edits to the draft policy. |
| **45** | **475** | **Land Use** | Wine sales and tasting rooms were not amended to include similar beverage production of cider and distilled alcohol. We believe that all three of these uses are similar in nature and should be treated equally, subject to a conditional use permitting process to ensure impacts are addressed fully. Restricting this use to grapes and wine is arbitrary and inequitable for farmers throughout the Gorge. | 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 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. |

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| **46** | | **Land Use** | It is not clear why a fruit and produce stand is not commercial in nature and this has potential to conflict with Oregon state laws that protect agriculture uses. | The 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.<br>As an interstate compact agency, the Gorge Commission is not required to align with Oregon or Washington state laws or land use goals.<br>The Gorge Commission will consider adding an amendment for allowing "incidental produce or edible product sales" at the October 2020 Commission meeting, but stated that it does not want to allow commercial events at these venues. |
| **47** | | **Land Use** | Recommendation: Do not roll back land use privileges on rural lands that are currently allowed under state law and the Management Plan. | The Gorge Commission has not approved any amendments that will limit existing allowances for commercial uses and events.<br>As an interstate compact agency, the Gorge Commission is not required to align with Oregon or Washington state laws or land use goals. |
| **48** | | **Land Use** | In Chapter 7, there is no definition of what a public dock is in Docks and Boathouses. The reason I believe it is necessary is that there is a size limitation on private docks and private docks serving multiple homes, but no limitation regarding public docks. So I'd like to see a definition of what constitutes a "public dock" so that it's not so open ended. Recommended definition: "Public dock" means a dock constructed, maintained and operated by a federal, state, local or tribal governmental entity to provide public access to a water body. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **49** | | **Land Use** | The draft plan amendments violate additional express provisions of the Act. Land use plan amendments are inconsistent with the Act's requirements to protect natural resource development and violate land use designations outlined in the Act's management plan standards. Specifically removing management plan provisions 3, 4, 8 and 9 impacts forest land and use protection. This directly conflicts with the Act's requirement that the Commission's land use ordinances include provisions to protect forest lands and forest uses. See 16 U.S.C. § 544(d). Additionally, the draft plan also proposes overly burdensome criteria for fire protection requirements by adjusting fuel breaks to account for site slope, riparian vegetation, and additional resource protection. The Act does not permit this. The role of state forest agencies in wildfire mitigation and management is also not acknowledged. The draft plan also includes inconsistent land use designation for forestland by not allowing the conversion of forest land into agriculture, another direct conflict with the Act (16 U.S.C. § 544d(d). Conflicts between the plan, the Act and Commission authority must be addressed before the draft plan is approved. | See 2. |
| **50** | **199**<br>**205**<br>**354** | **Land Use** | The draft plan fails to properly account for state and local authority designated in the Act.<br>Forest land within the scenic area is already well regulated under Washington and Oregon Forest Practice regulations. For example, state forest practice regulations limit clear cut sizes to support wildlife after harvest, require replanting of trees and protect natural resources like fish and wildlife habitat and water quality. Those state-level forest practice regulations should guide the Commission in the development of this plan.<br>Unfortunately, this version of the plan drafted by the Commission fails to recognize that state forest practice regulations supersede the Act as noted below:<br>The Act created a scenic area in the Columbia River Gorge that balances economic development in the scenic area with resource protection:<br>"Except for the management, utilization, or disposal of timber resources of non-Federal lands within the special management areas, nothing in [the Act] shall affect the rights and responsibilities of non-Federal timber land owners under the Oregon and Washington Forest Practices Act or any county regulations which under applicable State law supersede such Acts." 16 U.S.C. § 544o(c). | See 2. |

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| **51** | **197** | **Land Use** | Hard cider production and tasting is conspicuously absent from the current proposed draft of the Gorge Management Plan, in particular the sections addressing commercial uses outside city limits. [See e.g., p. 199, B. 6 & 7; p. 205, 2.E.; p. 354, GMA Guidelines 2.A] This an illogical and unfair restriction of a traditional, agriculture based business that parallels the Gorge's vineyard wineries and produces similar benefits in keeping with the values and aspirations of the Gorge Commission Management Plan. Please modify the GMA draft to include cideries as equivalent to wineries regarding allowed commercial activities.<br><br>We note that a passage from the original 1988 Gorge Commission Management Plan general discussion (at p. 15 in the current Draft) expresses an intention to "entice visitors to the east end of the Gorge,….to help spread the economic benefits of tourism and relieve some of the pressure on recreation sites in the west end of the Gorge." We suggest that wineries and cideries in Mosier have helped to make our tiny town into a tourist destination that draws visitors beyond Hood River into the eastern part of the Gorge. We are on the East Gorge Food Trail and have been featured in a Travel Oregon video.<br><br>We operate a small orchard and cider production business just outside of the Mosier city limits. We grow cider specific apple varieties and make traditional hard cider that has garnered regional and national awards. We are not allowed to have a proper tasting room (per scenic area restrictions). The changes to the Management Plan would further constrain our business without producing any benefits for the Scenic Area.<br><br>Hard cider production is a cold, fermentation-based process identical to wine production. This notion is confirmed by the federal government which issues a winery license to all licensed cideries. We grow most of the specialized apples we require in our orchard by the cidery. We source the rest from nearby apple growers in this uniquely fertile area. There was a cidery in Mosier dating back to the early 1800s and we believe our traditional and small approach honors that legacy. | 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 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. |
| **52** | **198** | **Land Use** | GMA Policy 6, Page 197. Friends supports the proposed removal of this provision to reflect in the Management Plan what has become standard practice | The Gorge Commission approved the removal of GMA Policy 6 under "Designation Policies" in LARGE-SCALE AND SMALL-SCALE AGRICULTURE: "Blocks of land that have been committed by development to other uses shall not be deemed used for or suitable for agriculture." |
| **53** | **199** | **Land Use** | Land Use Policy 3, Page 198. This policy should be restored. Removing this policy would be a significant change in policy and could result in, for example, repeal of agricultural setbacks in the future. Minimum lot sizes are not enough to prevent conflicts.<br>Friends proposed revision [proposed restored text in bold]:<br>**Agricultural land shall be protected from conflicts by limiting the number, size, proximity, and scale of conflicting uses on nearby lands.** | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **54** | **199** | **Land Use** | Land Use Policy 6, Page 199. The "shall" should be "may" to prevent future arguments about whether approval of home occupations and wine sales and tasting rooms is mandatory or optional on Agricultural Lands. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **55** | **199** | **Land Use** | Land Use Policy 7, Page 199. The "shall" should be "may" to prevent future arguments about whether approval of commercial events is mandatory or optional on Agricultural Lands. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **56** | **199** | **Land Use** | Land Use Policy 8, Page 199. The "shall" should be "may" to reflect that "accessory to agricultural use" is not the only approval criteria for agricultural buildings. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **57** | **200** | **Land Use** | Land Use Policy 9, Page 199. The "shall" should be "may" to reflect that the two listed criteria are not the only approval criteria for single-family dwellings. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **58** | **202** | **Land Use** | Land Use Policy 12, Page 200. The "shall" should be "may" to reflect that the two listed criteria are not the only approval criteria for processing and packing of agricultural products and uses that offer direct marketing opportunities. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |

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| **59** | **198** | **Land Use** | GMA Guideline 1.H.(3)(d). Page 202. The guidelines for single-family dwellings in conjunction with agricultural use need to be updated. The $40,000 minimum agricultural capability test adopted in 1991 is out of date and needs to be adjusted for inflation. The inflation rate based on the CPI data from the U.S. Department of Labor Bureau of Labor Statistics is 96.2%, which means $40,000 in 1991 dollars is approximately $80,000 in 2020 dollars. This should also be indexed to inflation so this does not need to be revisited. This income capability test also needs to be an income production test, consistent with Oregon law. | On 8/12/2020, the Gorge Commission passed a motion for an amendment to change the income capability standard: "Large-Scale and Small-Scale Agriculture, Review Uses, 1H(3)(d): Income capability. The farm or ranch, and all its constituent parcels, must produce at least $80,000 in gross annual income in 2020 dollars. This gross annual income amount shall be indexed for inflation on an annual basis using Consumer Price Index data from the US Bureau of Labor Statistics, and the new adjusted amount for each calendar year (calculated from 2020 dollars) will be posted on the Gorge Commission website by January 15 of each year. This determination can be made using the following formula:___" (CRGC Staff & USFS will investigate CPI for Commission). Staff made this amendment to the Draft Management Plan. |
| **60** | **198** | **Land Use** | Policy 6. Agricultural dwellings on forest land. Delete this policy allowing conversions of commercial forest land to an agricultural dwelling. This is inconsistent with the Act's requirement to protect forest land for forest uses and would increase the threats of wildfire in forest land due to residential uses. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **61** | **198** | **Land Use** | Policy 7. Page 198. Dwellings in large woodland zones. Delete this policy allowing dwellings in large woodland zones. This is inconsistent with the Act's requirement to protect forest land for forest uses and would increase the threats of wildfires in forest land due to the introduction of residential uses. Prohibiting new dwellings in forest land would protect productive forest land, adapt to climate change, protect public safety, and protect property by reducing the threats of human-caused forest fires. | On 8/12/2020, the Gorge Commission passed a motion for an amendment: "New dwellings are prohibited on lands designated Commercial Forest Land and Large Woodland." Staff made this amendment to the Draft Management Plan. |
| **62** | **225** | **Land Use** | Policy 8. Page 198. Dwellings in small woodland zones. Delete this policy allowing dwellings in small woodland zones, except on parcels that are not suitable for commercial forest uses and are not eligible for the states' forest tax assessment programs. Allowing dwellings in forest land is inconsistent with the Act's requirement to protect forest land for forest uses and prevent the conversion to residential uses. It increases the threats of wildfires in forest land due to the introduction of residential uses. Prohibiting new dwellings in forest land would protect productive forest land, adapt to climate change, and protect public safety and property by reducing the threats of human-caused forest fires. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **63** | **225** | **Land Use** | Guideline 1.A. Page 225. Dwellings in large woodland zones. Consistent with Friends' recommendation to delete policy 7, delete this guideline allowing dwellings in large woodland zones. This is inconsistent with the Act's requirement to protect forest land for forest uses and would increase the threats of wildfires in forest land due to the introduction of residential uses. Prohibiting new dwellings in forest land would protect productive forest land, adapt to climate change, protect public safety, and protect property by reducing the threats of human-caused forest fires. | See 61. |
| **64** | **226** | **Land Use** | Guideline 1.B. Page 225. Dwellings in small woodland zones. Consistent with Friends' recommendation to delete policy 8, delete this guideline allowing dwellings in small woodland zones, except on parcels that are not suitable for commercial forest uses and are not eligible for the states' forest tax assessment programs. Allowing dwellings in forest land is inconsistent with the Act's requirement to protect forest land for forest uses and prevent the conversion to residential uses. It increases the threats of wildfires in forest land due to the introduction of residential uses. Prohibiting new dwellings in forest land would protect productive forest land, adapt to climate change, protect public safety, and protect property by reducing the threats of human-caused forest fires. | Not proposed as an amendment by the Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **65** | **227** | **Land Use** | Guideline 1.C. Page 226. Agricultural dwellings in forest zones. Consistent with Friends' recommendation to delete policy 6, delete this guideline allowing conversions of commercial forest land to an agricultural dwelling. This guideline is inconsistent with the Act's requirement to protect forest land for forest uses and would increase the threats of wildfire in forest land due to residential uses. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **66** | **251** | **Land Use** | Guideline 1.N. Page 227. Second agricultural dwellings in forest zones. Consistent with Friends' recommendation to delete policy 6 and guideline 1.C., delete this guideline allowing conversions of commercial forest land to allow a second dwelling for a farm operator's relative. This guideline is inconsistent with the Act's requirement to protect forest land for forest uses and would increase the threats of wildfire in forest land due to residential uses. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **67** | **251** | **Land Use** | Land Use Policy 2, Page 251. The "shall" should be "may" to reflect that criteria other than not causing adverse effects on the resources to be protected by the Open Space designation still apply in the Open Space zone. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **68** | **261** | **Land Use** | Review Use 1.C, Page 251. If the word "improvement" is to be used then the potentially ambiguous term "improvement" should be defined in the Glossary. | Not proposed as an amendment by the Gorge Commission. No changes were made to the Draft Management Plan. |
| **69** | **264** | **Land Use** | GMA Goal 1, Page 261. The proposal changes a goal of residential land from "protect and enhance the character of existing residential areas" to "maintain the character of existing residential areas." Protecting and enhancing, or maintaining the character of a residential area could conflict with the Commission's mandate to protect and enhance the resources of the National Scenic Area. This provision should be stricken. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |

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| **70** | **261** | **Land Use** | Land Use Policy 7, Page 264. This provision should not be stricken so that the Commission can fulfill its mandate to protect and enhance recreation resources in the National Scenic Area. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **71** | **264** | **Land Use** | GMA Goal 1, Page 261. The proposal changes a goal of residential land from “protect and enhance the character of existing residential areas” to “maintain the character of existing residential areas.” Protecting and enhancing, or maintaining the character of a residential area could conflict with the Commission’s mandate to protect and enhance the resources of the National Scenic Area. This provision should be stricken. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **72** | **344** | **Land Use** | Land Use Policy 7, Page 264. This provision should not be stricken so that the Commission can fulfill its mandate to protect and enhance recreation resources in the National Scenic Area. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **73** | **346** | **Land Use** | Hardship Dwelling Guideline 1.A, Page 344. The proposal changes a guideline for temporary hardship dwellings so that the hardship can be for someone that does not live on the property at the time of the application. The intent of temporary hardship dwellings is so that caregivers can help a person who already occupies an existing dwelling on the parcel, not so that additional dwellings can be built to increase residential density in the National Scenic Area. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **74** | **348** | **Land Use** | Home Occupations Guideline 1.A, Page 346. The proposal changes a guideline for home occupations that would allow three outside employees. Creating employment centers outside of urban areas (e.g., when a CPA establishes a home occupation and moves its office and employees outside of an urban area) will drain the life from the towns in the National Scenic Area and create more traffic on rural roads. Short term rental overnight accommodations do not normally employ cleaning staff, they contract with cleaning services. | Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **75** | **357** | **Land Use** | Bed and Breakfast Inns Policy 3, Page 348. Bed and breakfast inns are a commercial use. Commercial uses are prohibited in the SMA. If not prohibited, approval new bed and breakfast inns should needs to be discretionary and based on compliance with guidelines to protect resources. Change “shall” to “may.” | The Management Plan currently allows bed and breakfast inns associated with residential use only in structures that are included in, or eligible for inclusion in, the National Register of Historic Places. No change to this policy was proposed as an amendment by the Gorge Commission and the change is not a technical edit.<br><br>Changing "shall" to "may" in the policy language is a technical edit. Staff will make this change to Draft Management Plan based on this comment. |
| **76** | **361-363** | **Land Use** | Variances from Setbacks and Buffers GMA Guideline 2.D, Page 357. There appear to be two typographical errors in this Guideline that should be fixed. | This is a technical edit. Staff made change to Draft Management Plan based on this comment. |
| **77** | | **Land Use** | Review Uses GMA/SMA Guidelines 7–10, 7, & 7, Page 361–363. New mineral production and the expansion of existing mines should not be allowed within the National Scenic Area. (There appear to be two typographical errors that number the Guidelines after 10 as 7 and 7.)<br>These 6 Guidelines should be removed. | Section 6(d) in National Scenic Area Act says the Commission cannot prohibit mining in the National Scenic Area as long as it is compliant with scenic, natural, cultural, and recreation resource protections. The Management Plan allows for the exploration, development, and production of mineral and geothermal resources, subject to the guidelines in Part I, Chapter 1: Scenic Resources.<br>Staff has changed the typographical errors noted. |
| **78** | **199** | **Land Use** | As noted and supported elsewhere in the Management Plan, agricultural uses are the foundation of the economy of the Gorge. Opportunities to add value to agricultural products is essential for maintaining family farms and diverse food production throughout the NSA. Current amendments proposed would reduce the ability for family businesses who have been working on this land for generations to think creatively about how to sustain their operations. These suggested changes are not in line with the values stated elsewhere in the Plan for supporting ag. Specifically, wineries are called out as being allowed but farm produce stands have been struck and other agricultural products are not mentioned. The language for allowed value-added agricultural uses should be stated in generic term and not be specific to any single product or occupation. | 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 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.<br>The Gorge Commission will consider adding an amendment for allowing "incidental produce or edible product sales" at the October 2020 Commission meeting, but stated that it does not want to allow commercial events at these venues. |
| **79** | **205** | **Land Use** | 6. Suggested edit: "Produce or product sales or tasting facilities, in conjunction with a lawful production facility." | See 78. |
| **80** | **206** | **Land Use** | 2.E. Suggested edit: "Produce or product sales or tasting facilities, in conjunction with a lawful production facility." | See 78. |
| **81** | **229** | **Land Use** | Retain in its entirety: "Bed and breakfast inns in single-family dwellings, subject to the guidelines in "Bed and Breakfast Inns." | See 7. |

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| **82** | **230** | **Land Use** | 2.E. Suggested edit: "Produce or product sales or tasting facilities, in conjunction with a lawful production facility." | See 78. |
| **83** | **347** | **Land Use** | Retain in its entirety: "Bed and breakfast inns in single-family dwellings, subject to the guidelines in "Bed and Breakfast Inns." | See 7. |
| **84** | **391** | **Land Use** | Bed and breakfast opportunities should be retained as another means to support family farms that do not impact scenic natural cultural or recreational resources. | See 7. |
| **85** | **356** | **Land Use** | 6.E. Suggested edit: "Produce or product sales or tasting facilities, in conjunction with a lawful production facility."<br>6.F. Suggested edit: "produce or product sales/or tasting facility, (retain: bed and breakfast inn)" | See 78. |
| **86** | **347** | **Land Use** | Agritourism is a growing industry in the Gorge and has become a fruitful investment for farms to diversify their income by finding ways for visitors to take part in the farm experience, through farm to table events, fruit stands, u-picks, and overnight experiences. Per page 356, we understand that all that is new is a requirement for a yearly report to be submitted to the reviewing agency by January 31st reporting on events held the previous year. This report shall include the number of events held, how many people were in attendance, and copies of catering contracts or other vendors used to verify. Permits for this work will not be renewed if there have been past violations, including failure to file. Our ask is that you communicate these changes clearly and in a timely fashion with farms that engage in agritourism events so they do not fall into the category of being unable to renew their permits because of failure to report. | Staff notes the request to communicate new commercial events guidelines clearly and in a timely fashion with landowners that hold commercial events. |
| **87** | **205 Sec C** | **Land Use** | As defined on page 347, Overnight Accommodations in rural areas that are associated with residential use, such as an Airbnb, are limited to no more than 90 room nights per year. I have heard from multiple stakeholders in the region who offer shared vacation rentals on their property who rely on that income to support their families. Limiting the opportunity to only 90 nights a year could have a significant impact on their livelihoods. Especially in the current pandemic circumstances, vacation rentals are anticipated to be the first overnight lodging to recover in the tourism industry, so having those available to guests in our region will help spur the local economy. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission proposed changes to the draft guidelines for Overnight Accommodations as an amendment, but this was not brought as a motion at the August 2020 Commission meetings. Staff will not make further edits to the draft policy. |
| **88** | **206 Sec M** | **Land Use** | pg. 205 Section C: Remove “primarily grown” and add back “raised on the subject farm” and add back “and farms in the local region”. Our regional farm stands have partnered well with surrounding farms to allow the stands to be sustainable. Limiting the products to what is primarily grown will cause most stands to no longer be sustainable. [It was heard during a meeting that the Gorge Commission has given policy direction to staff to interpret this as the majority of products (at one point it was mentioned 80%) sold in the farm stand need to be from the farm where the stand is located.] | The Gorge Commission will consider adding an amendment for allowing "incidental produce or edible product sales" at the October 2020 Commission meeting. |
| **89** | **217** | **Land Use** | pg. 206, section M: Add Back “Bed and breakfast inns in single-family dwellings, subject to the guidelines in "Bed and Breakfast Inns" (Part II, Chapter 7: General Policies and Guidelines) and provided that the residence: (1) Is included in the National Register of Historic Places, or (2) In Washington, is listed on the Washington State Register of Historic Places maintained by the Washington Office of Archaeology and Historic Preservation, or (3) In Oregon, is identified and protected under local landmark status as approved pursuant to Oregon state land use regulations protecting historic structures. | See 7. |
| **90** | | **Land Use** | pg. 217, section L: Remove “primarily grown” and add back “raised”. Add back “and other agriculture properties in the local region” | The Gorge Commission will consider adding an amendment for allowing "incidental produce or edible product sales" at the October 2020 Commission meeting. |
| **91** | | **Land Use** | Would like to see language in the Management Plan that explicitly describes the Commission’s oversight role in working with local land use agencies on permitting and inspection. | Comment is not related to specific proposed amendments to the Management Plan. |
| **92** | | **Land Use** | We do not want even more commercial logging and clear-cutting or post fire logging in the NSA. | See 2. |
| **93** | | **Land Use** | As a stakeholder that has been intimately involved in the Gorge 2020 process, it has become clear that the Commission has abandoned its mandate to protect and enhance local Gorge economies. The Amendments belie the Commission’s intention to adopt a “no growth” policy for urban areas, curtail forest practices, and restrict the exploration, development, and production of mineral resources. The promulgation of the Amendments violates both the spirit and plain language of the Act. In adopting the Act, Congress clearly recognized there must be balance between the twin purposes of preservation and economic development within the Scenic Area. The Commission and its members have forgotten their role in ensuring this balance remains. | Comment is not related to specific proposed amendments to the Management Plan. |
| **94** | | **Land Use** | The Amendments also disregard provisions of the Act which protect and promote forest practices and urban area economic development. On those issues, we support comments submitted by Davis, Wright, Tremaine LLP and Stoel Rives LLP, addressing essential economic activities within the NSA. | Comment is not related to specific proposed amendments to the Management Plan. |
| **95** | | **Land Use** | Beyond violating the Act, the Amendments also violate Washington’s Growth Management Act, RCW 36.70A (the “GMA”). The Amendments restrict and disincentivize forest practices and mining within the NSA and limit any prospect of growth for local Gorge economies. This is in complete opposition to the GMA’s mandate to maintain and enhance natural resource-based industries and encourage economic development and growth of urban areas. See RCW 36.70A.020. Incorporating these Amendments into the Management Plan is tantamount to explicitly instructing Washington’s Gorge Counties to adopt local land use ordinances which violate the GMA. | See 2. As an interstate compact agency, the Gorge Commission is not required to align with Oregon or Washington state laws or land use goals. |
| **96** | | **Land Use** | Improve regulations on rail expansion to better ensure protection of communities and scenic, natural, cultural and recreation resources. | Staff provided the Gorge Commission with all comments on this topic. Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |

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| **97** | | **Land Use** | Prohibit new mining, including new open pit quarries within the scenic area | Section 6(d) in National Scenic Area Act says the Gorge Commission cannot prohibit mining in the National Scenic Area as long as it is compliant with scenic, natural, cultural, and recreation resource protections. The Management Plan allows for the exploration, development, and production of mineral and geothermal resources, subject to the guidelines in Part I, Chapter 1: Scenic Resources. |
| **98** | | **Land Use** | Prohibit commercial logging on all National Forest lands in the scenic area | Forest practices, where allowed, are allowed outright, according to the National Scenic Area Act's savings provisions. |
| **99** | | **Land Use** | Expand open space designations to protect sensitive areas and newly acquired public lands. | Staff provided the Gorge Commission with all comments on this topic. Not proposed as an amendment by the Gorge Commission and not a technical edit. No changes were made to the Draft Management Plan. |
| **100** | | **Land Use** | Protect high value farm land. For example, update standards for agricultural dwellings to better protect farm land from residential sprawl. Make the standards for new farm dwellings at least as strong as Oregon's standards outside the National Scenic Area, which require proof of at least $80,000 in gross annual farm income. | See 59. |
| **101** | | **Land Use** | What is strikingly absent from the review is forest management. This is an incredible oversight to say the least. Facts and figures about the health of the Columbia Gorges forests along with those of urban boundaries and acreages would be most appropriate since the forests and natural areas comprise the majority of the gorge. Isn't that what we are fighting for? Having climate change as a top priority is puzzling since this is not really tangible in the real world. There is little that can be done about it as influences outside the boundaries of the Columbia Gorge have a far greater impact on climate change aside from the fact that deforestation inside the boundaries can contribute. If the commission is going to be concentrating on what is in the gorge itself and what can be protected within and around the boundaries then forestry should also be made a priority. They should lead by example by putting the logging industry on record and saying enough is enough. The Columbia River Gorge National Scenic area is a protected area and "no more clear cutting in the gorge"!! I am absolutely appalled by this lack of foresight. It appears that the commission and those that support it are afraid of the "industry." I am reconsidering my contributions to those who support these proposals and instead giving my donations to those groups who are genuinely and accurately involved in the protection of what remains of the native forests and landscapes of the northwest. I am beginning to believe that focusing on urban boundaries and climate change may be important but over emphasis on these subjects becomes a red herring and does not address the larger issues while letting the timber industries continue to rape and pillage the natural forests. Case in point, the commission pounded away at a tiny gravel mine near Washougal Washington that can barely be found on a map all the while log trucks with massive old growth trees on them were pounding down highway 14 from timber inside the boundaries of the Scenic Gorge Area and within close proximity. I am more than disappointed and will most likely be looking to turn donations toward organizations that are succeeding in forest restoration and recovery. Any input from your staff would be appreciated. | Forest practices, where allowed, are allowed outright, according to the National Scenic Area Act's savings provisions.<br>The Management Plan regulates land use and development in the National Scenic Area (NSA). Forest management on the vast majority of forested lands in the NSA is designed and carried out by the U.S. Forest Service and other landowners. The NSA Act protects lawful application of state Forest Practices Acts on private forest lands. Forest practices are allowed without review on all NSA General Management Area land use designations except for Open Space and Agriculture-Special. The Management Plan does allow and support proactive forest health and fuels reduction activities, and it requires fire protection measures for new development on forest Land Use Designations. |

| | Page | Topic | Comment | Response |
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| 1 | 117 | NR | For natural resources, please increase stream buffers to a minimum of 200 feet | During its August 2020 meeting, the Gorge Commission approved a policy in Part 1, Chapter 3: Natural Resources requiring a 200-foot buffer for 7 EPA priority cold water refuge streams within the GMA (also noted in the Part 3, Chapter 1: Climate Change). These include the Sandy River, Wind River, Little White Salmon River, White Salmon River, Hood River, Klickitat River, and Deschutes River. The wildlife section of the Natural Resources chapter does allow for wider buffers on a case-by-case basis as needed to protect specific species. |
| 2 | 107 | NR | Prohibit any loss of wetlands | The Gorge Commission approved a "no loss" of wetlands goal for the GMA. See response 26. |
| 3 | 121-128 | NR | Protect the habitats of sensitive and at-risk species such as pika and salmon. | Proposed development is reviewed to ensure no adverse effects on rare and sensitive species and habitats. Pika and their habitats, talus slopes, and salmon and their habitats (streams and riparian), are protected under the Management Plan. |
| 4 | | NR | When proponents of the Scenic Area made their case, for enactment, we were told that the act would not only protect the landscape and cultural resources of the Gorge, but the economies. The landscape and cultural protection has occurred, with the exception, in my opinion, of healthy forest management. The Eagle Creek fire is an example of the damage that occurs with poor forest management. | The Management Plan regulates land use and development in the National Scenic Area (NSA). Forest management on the vast majority of forested lands in the NSA is designed and carried out by the U.S. Forest Service and other landowners. The Act protects lawful application of state Forest Practices Acts on private forest lands. The Management Plan does allow and support proactive forest health and fuels reduction activities, and it requires fire protection measures for new development on forest Land Use Designations. |
| 5 | 107 | NR | The MP needs to specifically prohibit the loss or destruction of wetlands. As with the 200-ft streamside buffers, a “no loss” standard to wetlands protection has been applied for nearly 30 years in the SMAs. | See 26. |
| 6 | 116 | NR | The Gorge MP currently provides a 100-foot buffer for perennial streams and a 75-foot protective buffer for wetlands, ponds and lakes in forest habitat. Those buffers should be increased to a minimum of 330 feet. Western pond turtles, which are “endangered” in WA and “sensitive/critical” in OR, lay their eggs lay eggs on land 330 feet or more away from streams, ponds and lakes. | The Gorge Commission approved a "no loss" of wetlands goal for the GMA (See 26) and a 200-foot buffer for 7 EPA priority cold water refuge streams within the GMA (See 1). The Gorge Commission did not amend the Draft Management Plan language to include revised buffers for any specific species because the wildlife section in this chapter allows for species-specific conditions of approval which may include wider buffers. |

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| **7** | **122<br>154** | **NR** | Comments on natural resources: Since the first management plan there have been changes in the status of various plants and animals. For instance, Peregrine Falcons were delisted in 1999 and are NOT now considered a species of concern. Very happily, they are doing well. Also, they nest on bridges, skyscraper windows, and other human structures, often in the heart of cities. Human presence does not seem to bother them, even when nesting. They get used to people's presence. So there is now no scientific basis for closing trails in summer near where they nest or for not building trails near their cliff habitats. In the original management plan the Broadleaf lupine, Lupinus latifolius, variety Thompsonianus was listed as a Gorge endemic variety. Since then botanists have renamed and classified lots of plants, and most recently this variety has been lumped with another wide-ranging variety, var. latifolius, and so the plant is no longer considered endemic to the Gorge. | The Management Plan is adaptive to changes in sensitive plants, wildlife, and habitats by referring to up-to-date federal and state lists and requiring consultation with federal and state agencies. It is true that peregrine falcons have been delisted, and the 5-year recovery monitoring period is completed for the ESA. Peregrines are considered a globally secure population, however NatureServe ranks populations in Oregon and Washington as "vulnerable," and in Washington, breeding populations are considered "critically imperiled." Oregon considers peregrines a Species of Greatest Conservation Need (or Conservation Strategy Species). The commenter also recommends removing Thompson's lupine from the list of rare endemic plants. This change, and others, are reflected in Table 2: "Columbia Gorge and Vicinity Endemic Plant Species" included in Part 1: Chapter 3: Natural Resources. |
| **8** | | **NR** | There should be no further loss of any parts of this great ecosystem- wetlands, forest, waters, air. We should be tracking keystone species and monitoring forest and water health, development and recreation impacts. What are climate change impacts and how can and should we be proactively working to reduce expected impacts? | See 26. With regard to monitoring and climate change impacts, the Vital Sign Indicators (VSI) project and Climate Change Action Plan are high priorities in the Gorge Commission's post-Gorge 2020 work plan. Part III, Chapter 1: Climate Change provides an overview of climate change impacts in the National Scenic Area, and Policy 1 specifically directs the Gorge Commission to develop and adopt a Climate Change Action Plan that will examine climate change impacts in more detail and provide adaptation and mitigation strategies and actions to address these impacts. Policy 2 in this chapter focuses on integrating climate change action planning with VSI, including developing climate change indicators. |
| **9** | **104** | **NR** | "Guidelines that require Best Management Practices and resource protection policies are applied to development activities to prevent and minimize adverse effects to natural resources." Suggest removing "and minimize" | In the Natural Resources Chapter under "Key Issues," the language used is "minimize impacts" (not "minimize adverse effects"): "Guidelines that require Best Management Practices and resource protection policies are applied to development activities to prevent and minimize impacts to natural resources." The Act requires that development occur without adverse effect to scenic, natural, cultural, and recreation resources, and the Management Plan includes generally applicable provisions that ensure no adverse effect to natural resources. |

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| **10** | **105** | **NR** | Water resources are listed as wetlands, streams, ponds, lakes, and riparian areas.<br>What about the Columbia River??!!!! This is a critical and central resource that needs focus and help to address climate and wildlife (especially salmon) concerns. As we have seen, especially most recently, the federal government is not a dependable partner for protection. | The Gorge Commission's authority is limited by section 17(a)(3) of the Act, which preserves the jurisdiction of the federal government and others over the Columbia River. In Part 1, Chapter 3: Natural Resources, GMA Policies: Wetlands and GMA Policies: Water Resources: Streams, Ponds, Lakes, and Riparian Areas describes how "the guidelines in the Management Plan shall not apply to the main stem of the Columbia River. The Gorge Commission will rely on the applicable federal and state laws to protect wetlands in the Columbia River, including the U.S. Clean Water Act, Washington State Environmental Policy Act, Washington Hydraulic Code, Oregon requirements for compliance with Statewide Planning Goal 5, and Oregon Removal-Fill Act." The Columbia River is considered a stream (and in some locations a wetland) and applicable natural resources protections apply. Scenic resource provisions also require setbacks from the river. |
| **11** | **105** | **NR** | “In the GMA, exceptions are made for several uses, including low intensity uses and water-related and water-dependent uses, if there is no practicable alternative and adequate protection of the resource is provided.” How is ‘adequate protection’ defined? How does allowing for these exceptions square with the first goal of the national scenic act? | "Adequate protection" is achieved by the subsequent guidelines for review uses described under GMA Guidelines: Wetlands and GMA Guidelines: Water Resources: Streams, Ponds, Lakes, and Riparian Areas. |
| **12** | **106** | **NR** | “New development is prohibited in the buffer area, though variances may be made in the GMA if the buffer would deny all reasonable use of a parcel.” What is the<br>buffer zone/ how is it defined? For new land ownership (post creation of the NSA), there should be a responsibility for the buyers to determine if their desires match with those of the NSA management act. | The sentence referenced in this comment is in the introductory section of the Natural Resources Chapter. Buffers are defined later in the chapter under GMA Policies and Guidelines for each resource: Wetlands; Streams, Ponds, Lakes, and Riparian Areas; Wildlife Habitat; and Rare Plants. |
| **13** | **107** | **NR** | Wetlands are a precious resource. Prohibit any loss of wetlands by applying a “no loss” standard to wetlands protections. This standard has been applied for nearly 30 years in the SMAs and needs to be applied to the GMA. You cannot create a wetland (or really any type of ecosystem) that functions anywhere near as well and as efficiently and effectively as Mother Nature can. | See 26. |

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| **14** | **122** | **NR** | Section 1, C4. What are the criteria for the species on this list? The government lists that I was able to find for endangered species were from 2008. Do we really want to be operating on 12 year old information? Also, given all the listings for the Columbia River Basin salmon stocks, should we not be doing something proactive to help preserve these keystone species, unique to this set of ecosystems? The management plan also says that these lists are available on the Gorge Commission website - I did a search on 'endangered' and 'threatened' and in both cases the results were 'no results'. | The Draft Management Plan adds clarification to these questions and points to state and federal agency websites to locate these lists. The Gorge Commission obtains spatial data on these species but does not maintain lists on its website. |
| **15** | | **NR** | Concerns about allowing development and seeming to emphasize mitigation over proactive protections. | The Management Plan uses avoidance as an initial approach. The definition of "adverse effect" in the Act requires the consideration of four factors, one of which is mitigation. The Gorge Commission must therefore consider opportunities for mitigation as appropriate and needed. The Gorge Commission also encourages and supports proactive resource enhancement activities as described in Part III: Chapter 4: Enhancement Strategies. |
| **16** | **125**<br>**132** | **NR** | If 30 days is to be the comment period standard for tribes, make the comment period for state agencies the same. (The current requirement for state wildlife and rare plant review is 20 days) | The Draft Management Plan incorporates this suggestion to achieve a consistent, 30-day comment period time frame for tribes and state agencies. The new language is "8. The local government shall submit a copy of all field surveys and wildlife management mitigation plans to the Oregon Department of Fish and Wildlife or Washington Department of Fish and Wildlife. The state wildlife agency will have 30 days from the date that a field survey or management plan is mailed to submit written comments to the local government." |
| **17** | | **NR** | There is new language and reorganized sections of the Natural Resources chapter that are not reflected in the June Redline. The redline chapter should be corrected and re-noticed for public comment with the corrected language highlighted for the public. "Water resources" is a new term used throughout Chapter 3 and it is not defined in the Glossary. A definition should be added in the version recirculated for public comment. | The intent of the reorganized section, "Water Resources: Wetlands, Streams, Ponds, Lakes, and Riparian Areas," is to be consistent with how goals, objectives, and policies are organized for the SMA Water Resources section within the Natural Resources chapter. |

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| **18** | **116** | **NR** | We would like to share our new riparian habitat management tools as a recommendation for addressing riparian buffers throughout the plan. The purpose of WDFW's forthcoming Priority Habitat and Species (PHS) Riparian Volume 2: Management Recommendations is to provide guidance to protect, and—where possible, restore—healthy, intact, and fully functioning riparian ecosystems. The width of the riparian ecosystem is typically based on site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain. A fundamental component of PHS Riparian Volume 2 is the use of SPTH at 200years (SPTH200) to help delineate the width of the area that, when fully functioning, provides sufficient riparian habitat for fish and aquatic wildlife, and also generally supports the riparian habitat needs that terrestrial wildlife have. SPTH200 is based on a number of characteristics including soil type, slope, most common long-lived tree species, and the predominant surrounding ecosystem within the landscape. Washington Department of Fish and Wildlife complied and analyzed this data for the majority of Washington State and created an online, publicly-available mapping tool to depict this information spatially. | The Gorge Commission appreciates the specific recommendation and tool for establishing riparian buffers. The Draft Management Plan includes a new policy for 200-foot buffers for seven EPA priority cold water refuge streams in the GMA. As noted in Policy 1 in the Climate Change Chapter, protecting streams and riparian areas, including buffers as one management option, will be explored as part of climate change action planning. The Gorge Commission will consider WDFW recommendations during this effort. |
| **19** | **122** | **NR** | Please consider adding peregrine falcons and bald eagles to your species of special interest to the public. These raptors frequently utilize the scenic area and enjoyed by members of the recreating public. Or consider not limiting the number or type of species in order to be adaptive to changing public interests. | Peregrine falcons were added to the species listed under GMA Policy 1.C(4) for Wildlife Habitat. The new text is: "Considered to be of special interest to wildlife management authorities and the public (such as great blue heron, osprey, golden eagle, peregrine falcon, and prairie falcon)." This text was changed with the intent that this is a non-exclusive list. |

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| **20** | **109** | **NR** | Proposed text on P109 – GMA Policies. [Policy 4 in Draft MP] 5. Practicable measures shall be applied to minimize unavoidable impacts to streams, ponds, lakes, aquatic and riparian areas. *Please refine or modify the language regarding riparian areas. "Riparian areas" is a vague term (from the definitions in the Glossary, p484: Riparian area: The area immediately adjacent to streams, ponds, lakes, and wetlands that directly contributes to the water quality and habitat components of the water body. This may include areas that have high water tables and soils and vegetation that exhibit characteristics of wetness, as well as upland areas immediately adjacent to the water body that directly contribute shade, nutrients, cover, or debris, or that directly enhance water quality within the water body.) This definition with the "may include" language makes it difficult to assess riparian areas with certainty understandable to all parties. Current SMA and GMA policies require buffers around water resources. Including riparian areas basically adds a buffer around a buffer. Scientifically, the term riparian (areas adjacent to streams that affect their function) is vague--a hydrologist would potentially define the riparian area as the hyporheic zone which in the Gorge would likely be only a few feet. Whereas a stream entomologist would look at potential detrital inputs which could be coming from many hundreds of feet. It is generally just difficult to define the "riparian" boundaries. These differing definitions could lead to confusion and uncertainty. The original language wetland/water resource section discusses the importance of riparian areas with wetlands and streams, but never placed a buffer on them- because they actually are buffers. Placing them as part of the water resources and then placing a buffer around water resources is putting a buffer around a buffer. It would be less ambiguous and consistent with the current regulations if riparian areas were dropped from the regulations and replaced with buffers.* | Guideline 2 under "Water Resources Buffer Zones" defines water resource buffers as a distance "measured outward from the bank full flow boundary for streams, the high water mark for ponds and lakes, the normal pool elevation for the Columbia River, and the wetland delineation boundary for wetlands on a horizontal scale that is perpendicular to the water resource boundary." The buffer section does not set buffers around riparian areas, but rather sets distances from water bodies in order to protect the riparian area and functions. Staff reviewed water resources definitions and glossary terms and determined no change was necessary. |
| **21** | **121** | **NR** | From the summary of Natural Resources chapter changes provided with the Management Plan update materials on the Gorge Commission website, this chapter "Updated "sensitive wildlife species" to "rare" as a term, given that "sensitive" is both a specific type of status and also a generic term for status species." *Our resource specialists prefer the term "regulated" or "CRGNSA regulated" rather than "rare," as this also has other meanings. ODOT supports removing the "sensitive" from the language for the reasons cited above.* | The multi-agency Natural Resources technical team that helped develop draft language for this chapter discussed different options to address the concern that one term can have multiple meanings across agencies. Based on the team's recommendations, the Gorge Commission decided that "rare wildlife species" and "rare plant species" were appropriate with clear definitions in the chapter and glossary. |

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| **22** | | **NR** | Multiple provisions of the proposed Amendments negatively impact the rights and responsibilities of non-federal timber landowners, in direct contravention of the savings provision. In addition, the Amendments effectively limit private landowner autonomy and stifle economic development in the GMA, which conflicts with legislative intent. We are particularly concerned with the provisions affecting forest management and forest land conversion including, but not limited to: Amendments to the Natural Resources Chapter indicating intent to minimize forest practices by expanding regulation of water resources and buffer zones, expanding the scope of habitat areas and habitat protection, and restricting low intensity uses. Amendments to the Forest Land Chapter removing the objective to encourage state grants and loans to support forest products, removing forest land protection policies dealing with conflicting uses and conversion, and changing fire protection approval criteria. Amendments to the Action Program to add a policy for expanded buffers, add standards to preserve forest resources for carbon storage, add climate change to the cumulative impacts analysis, limit enhancement of land for forest uses, and alter economic development policies for the GMA. | The Management Plan allows forest practices as a use allowed outright, except in Open Space and Ag Special Land Use Designations. The Natural Resources chapter contains a policy that specifically excludes forest practices from the standards in that chapter. |
| **23** | | **NR** | As stated in other submitted comments, including the April 28, 2020 letter from Port of The Dalles, the Commission must address substantive differences between the December and April draft plans before approval. The Commission must also explain why staff recommendations have been ignored in plan revisions, including recommendations regarding defining low intensity uses contained in the Staff Letter dated December 11, 2018 from Jessica Olson and Casey Gatz, and recommendations related to priority habitat winter range and sensitive wildlife areas from the Staff Report dated May 14, 2019. As part of the administrative record, a responsiveness summary and explanation of deviations between the draft plan changes and staff recommendations needs to be developed. Accordingly, we believe the best course of action is for the Commission to withdraw this proposal and engage stakeholders in a meaningful and transparent manner. | Staff reviewed the staff reports mentioned in this comment and did not find any discrepancies between staff recommendations and the draft that the Gorge Commission provided for public review. This comment did not identify any specific discrepancy. |

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| **24** | **106<br>116<br>117<br>124** | **NR** | Wetlands, Page 106: Prohibit any loss of wetlands by applying a “no loss” standard to wetlands protections. This standard has been applied for nearly 30 years in the Special Management Areas (SMA) and needs to be applied to the General Management Areas (GMA). Wetland, Pond and Lake Buffers, Page 116: Western pond turtles are listed as “endangered” in Washington and “sensitive/critical” in Oregon. Western Pond Turtles spend considerable time in terrestrial habitat and usually lay eggs 100 meters (330 feet) or more away from streams, ponds and lakes. The Management Plan only provides a 100-foot buffer for perennial streams and a 75-foot protective buffer for wetlands, ponds, and lakes in forest habitat. Improve wetland, pond, and lake buffers to protect endangered Western Pond Turtle nesting and rearing habitat by increasing buffers around suitable habitat for the only native turtle species in the Gorge. Increase protective buffers to a minimum of 100 meters. Guideline 2.A., Page 116. Stream Buffers, Page 117: To protect habitat for threatened and endangered trout and salmon populations within the National Scenic Area and to adapt to increased stream temperatures and changes to seasonal flows resulting from climate change, increase protective stream buffers to a minimum of 200 feet in Guideline 2.B., Page 117. Priority Habitat and Sensitive Wildlife Protection, Page 124: To better protect at risk species in the Gorge, such as the American Pika, prohibit adverse effects to all Priority Habitats. For example, prohibit mining, logging, and development within all suitable habitat for the Pika, especially talus slopes. | See 3, 6, and 26. |
| **25** | **107** | **NR** | GMA Goal #1, Page 107. Wetlands.1. Achieve no ~~overall net~~ loss of wetlands acreage and functions. | During its August meeting, the Gorge Commission approved the change from "no net loss" to "no loss" in Goal 1 of Part I, Chapter 3: Natural Resources, GMA Provisions, Water Resources: Wetlands, Streams, Ponds, Lakes, and Riparian Areas. Goal 1 now reads: "Achieve no loss of wetlands acreage and functions." Staff then reviewed language throughout the GMA Provisions, Water Resources section to determine where modifications were needed to align existing GMA objectives, policies, and guidelines with the revised “no loss of wetlands” goal. Staff only changed the minimum language required to achieve consistency across sections, and to clarify the limited uses that may occur in wetlands to meet public safety needs, while meeting the management intent of the revised goal. The Gorge Commission approved these edits at its September 2020 meeting. |

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| **26** | **108** | **NR** | Delete GMA Policy 6 for Wetlands: "6. New uses shall be sited to avoid wetlands and any adverse effects to wetlands ~~to the greatest extent practicable. New uses that are not water-dependent or water-related shall may be allowed in wetlands when less environmentally damaging practicable alternatives do not exist."~~ | Staff modified this language to be consistent with the revised "no loss" of wetlands goal. The new text is: "New uses shall avoid wetlands to the greatest extent practicable." |
| **27** | **108** | **NR** | Delete GMA Policy 7 for Wetlands: "7. Impacts to wetlands ~~shall~~ may be allowed only when all practicable measures have been applied to minimize those impacts that are unavoidable and in the public interest." | Staff modified this language to be consistent with the revised "no loss" of wetlands goal. The new text is: "Impacts to wetlands may be allowed only when all practicable measures have been applied to avoid those impacts, and the use is in the public interest." |
| **28** | **109** | **NR** | GMA Policy 1 for Streams, Ponds, Lakes, Riparian Areas: Unless these sections of the Columbia River are designated and mapped as urban areas, there are no exceptions in the Act from the requirements to protect and enhance natural resources and to avoid adverse effects. Delete entire policy: "1. The ~~stream, pond, lake, and riparian area~~ water resource goals, policies, and guidelines in the Management Plan shall not apply to those portions of the main stem of the Columbia River that adjoin the Urban Areas. The Gorge Commission will rely on the applicable federal and state laws to protect those portions of the Columbia River that adjoin the Urban Areas. These policies are not intended to impede or prevent implementation of Tribes' treaty rights in their ceded lands and aboriginal territories." | Staff clarified the final sentence of this policy. The new text is: "These policies are not intended to affect or modify treaty-reserved rights and other rights of the four Columbia River treaty tribes." |
| **29** | **109** | **NR** | GMA Policy 2. Recommend adding sentence to the end "These uses shall not adversely affect water quality, natural drainage, or wildlife habitat." | The Gorge Commission believes that its buffers, uses allowed, standards for grading, and other regulations already have this effect. Wildlife habitat is protected under the wildlife habitat section of the Natural Resources chapter. |
| **30** | **109** | **NR** | GMA Policy 3. New uses that are not water-dependent or water-related may be allowed in streams, ponds, lakes, and riparian areas if they are in the public interest, ~~and~~ practicable alternatives do not exist and will not result in adverse effects. | The guidelines in the Water Resources section already specifically prohibit adverse effect. |
| **31** | **109** | **NR** | Practicable measures shall be applied to ~~minimize unavoidable impacts~~ avoid adverse effects to streams, ponds, lakes, and riparian areas. | The guidelines in the Water Resources section already specifically prohibit adverse effect. |

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| **32** | **112** | **NR** | The Act and other sections of this chapter prohibit adverse effects to natural resources. In the second sentence, the term “considered” could be interpreted to mean that the measures are not mandatory and only need to be thought about. Change "considered" to "applied." | Staff retained "considered" because not every one of the measures in the list under this guideline would apply in every situation. The following measure was added to make clear adverse effects are prohibited: "Proposed uses in water resources and their buffer zones shall be evaluated for adverse effects, including cumulative effects, and adverse effects shall be prohibited." Similar language was also added to "Approval Criteria for Uses in Wetlands" and "Approval Criteria for Modifications to Serviceable Structures and Minor Water-Dependent and Water-Related Structures in Water Resources" sections. |
| **33** | **113** | **NR** | GMA Guideline 1.C.(5) Change "should" to "shall" | Consultation with permitting agencies is already required, and these agencies should determine culvert design. |
| **34** | **113** | **NR** | Proposed change: GMA Guideline 1. H. Restoration, creation, and enhancement shall achieve ~~no net loss~~ improvement of water quality, natural drainage, and fish and wildlife habitat of the affected wetland, stream… | This change has been made to align with the "no loss" of wetlands goal approved by the Gorge Commission. The new text is "GMA Guideline 1.H. Restoration, creation, and enhancement shall improve water quality, natural drainage, and fish and wildlife habitat of the affected wetland, stream, pond, lake, or buffer zone." |
| **35** | **114-115** | **NR** | GMA Guideline 1. H. (10) – (13). Delete references to wetland destruction/destroying wetlands. | The language "or destroyed" has been removed throughout the chapter for consistency and to align with the revised "no loss" of wetlands goal. |
| **36** | **116** | **NR** | GMA Guideline 2 A. Within the range of western pond turtles, a 100 meter buffer zone width, measured from the ordinary high water mark, shall be required. | The Gorge Commission did not amend the Draft Management Plan language to include revised buffers for any specific species because the wildlife section in this chapter allows for species-specific conditions of approval which may include wider buffers. |

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| **37** | **117** | **NR** | GMA Guideline 2.B.Two options: 1. (Preferred) Apply the SMA water resource buffers in the GMA. This includes requiring 200-foot buffers for perennial fish bearing streams. Allow variances to the buffers if they conflict with another natural resource buffer or would result in no beneficial economic use of a property. Variances could be granted if there are no practicable alternatives to the location and scope of the proposed use or development and the variance is the minimum necessary to allow the new use or development. 2. At a minimum, incorporate the WDFW Management Recommendations for Riparian Habitat into the Management Plan. Prohibit uses and development that are likely to adversely affect riparian and stream systems. Allow variances to the buffers if they conflict with another natural resource buffer or would result in no beneficial economic use of a property. Variances could be granted if there are no practicable alternatives to the location and scope of the proposed use or development and the variance is the minimum necessary to allow the new use or development. Recommended stream buffers are found on page 87.<br>https://wdfw.wa.gov/sites/default/files/publications/00029/wdfw00029.pdf | See 1. |
| **38** | **131** | **NR** | Guideline 2. Replace list of uses requiring a plant survey to say "F. Review uses involving ground disturbance within 1,000 feet of a rare plant site, unless previously surveyed within the past 10 years. Notice of development review shall contain a statement that the proposed development is within 1,000 feet of a rare plant." | The regulations already require natural resource specialists to review proposed developments within 1,000 feet of a rare plant site, and if necessary, a county could require a survey. |
| **39** | **134<br>147** | **NR** | GMA/SMA: Practicable Alternative Test. Revise to read: "1. An alternative site, size, scope, configuration, design or scale for a proposed use shall be considered practicable if it is available and the basic ~~proposed~~ use can be undertaken on that site ~~after taking into consideration cost, technology, logistics, and basic overall project purposes~~.<br>A practicable alternative does not exist if a project applicant satisfactorily demonstrates all of the following:<br>A. The basic purpose of the use cannot be ~~reasonably~~ accomplished using one or more other sites in the vicinity that would avoid ~~or result in less~~ adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites.<br>B. The basic purpose of the use cannot be ~~reasonably~~ accomplished by reducing its proposed size, scope, configuration, or density, or by changing the design of the use in a way that would avoid ~~or result in less~~ adverse effects on wetlands, ponds, lakes, riparian areas, wildlife or plant areas and/or sites." | The Gorge Commission approved clarifying edits to Guideline 2.A and 2.B at its September 2020 meeting. The new text is: "2. A practicable alternative does not exist if a project applicant satisfactorily demonstrates all of the following: A. The basic purpose of the use cannot be reasonably accomplished using one or more other sites in the vicinity that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, ~~and~~or wildlife or plant areas ~~and/~~or sites. B. The basic purpose of the use cannot be ~~reasonably~~ accomplished by reducing its proposed size, scope, configuration, or density, or by changing the design of the use in a way that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, ~~and~~or wildlife ~~and~~or plant areas ~~and/~~or sites." |

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| **40** | **124** | **NR** | Priority Habitat and Sensitive Wildlife Protection, Page 124:<br>To better protect at risk species in the Gorge, such as the American Pika, prohibit adverse effects to all Priority Habitats. For example, prohibit mining, logging and development within all suitable habitat for the Pika, especially talus slopes. | Proposed development is reviewed to ensure no adverse effects on rare and sensitive species and habitats. Pika and their habitats, including talus slopes, are protected under the Management Plan. |
| **41** | | **NR** | Supports reference to CWR streams; clarified that Bridal Veil, Wahkeena, Fifteenmile, and Rock Creeks have potential if restored | This clarification is appreciated. Staff initially included eight profiled streams from the EPA Draft Cold Water Refuges Plan that were located within the GMA. Fifteenmile Creek is not listed by EPA as a primary CWR habitat at this time. EPA recommends restoration of Fifteenmile to improve its potential to provide CWR habitat. Per this clarification from EPA, staff modified the proposed CWR buffer policy to omit Fifteenmile Creek. On 8/11/20, the Gorge Commission approved a 200-foot buffer for seven EPA priority CWR streams within the GMA and eliminated Fifteenmile based on this comment from EPA. The CWR streams included in the Draft Management Plan include the Sandy River, Wind River, Little White Salmon River, White Salmon River, Hood River, Klickitat River, and Deschutes River. |
| **42** | **116** | **NR** | Supports best available science and 200-ft buffer for CWR streams | See above and 1. |
| **43** | **110-112** | **NR** | Page 112, Approval Criteria for Other Review Uses in Water Resources: Revert back to original text: "(1) The uses identified in Guideline 2 under "Review Uses," above, may be allowed only if they meet all of the following criteria..." 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. | This change was unintentional and has been corrected. Following the August 12, 2020 meeting, staff separated approval criteria for uses in wetlands from other water resources to align with the revised "no loss" of wetlands goal. Guideline 2 referenced in this comment was re-numbered as Guideline 3. The new text is "1. The uses identified in Guideline 3 under "Review Uses," above, may be allowed only if they meet all of the following criteria:" |
| **44** | | **NR** | Incorporate water quality assessment information from Washington State; include more specific bmps to maintain and improve water quality | The Gorge Commission did not address water quality because this falls outside the scope of a technical review of the Natural Resources Chapter. |
| **45** | | **NR** | Proactively establish a formal program to address water quality issues resulting from current land use and development | See above. |
| **46** | | **NR** | Primary goal of the CRGNSA is preserving natural resources; this drives economy through tourism and recreation opportunities. Should be no further loss of wetlands, forests, or waters. Simple mitigation is not enough, and Commission should be making efforts to improve ecosystem health. | See 15 and 26. |

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| **47** | | **NR** | Support protecting watersheds and improving survival of fish; 200-foot stream buffers are critical. | See 1. |
| **48** | | **NR** | Recommend some acknowledgment that OR Forest Practices Act offers weak protection for streams. Need to consider WA and CA forest practices rules that are more protective. | See 18. |
| **49** | | **NR** | Protect our Natural Resources by increasing stream buffers to a minimum of 200 feet, prohibiting any loss of wetlands and protecting the habitats of sensitive and at-risk species, such as pika and salmon. We do not want more development and urban sprawl. | See 1, 3, and 26. See Urban Area Boundaries section for response to comments related to urban expansion. |
| **50** | | **NR** | Ensure the natural recovery of forests impacted by the Eagle Creek fire and prohibit post-fire logging. Ensure the recovery of native plant communities by adopting a comprehensive program to combat the spread of invasive species. Ensure the agencies are following the law on all emergency responses, post-fire actions and mitigation measures for resource damage resulting from fire response activities. | See 4. |
| **51** | | **NR** | Base plan review on the best available science and sound resource protection policies. Updating the resource inventories, completing a simulated "build-out" of development allowed within the scenic area and reliance on the "Vital Signs Indicators" program will help ensure that plan review is data driven. | The Management Plan is adaptive to changes in sensitive plants, wildlife, and habitats by referring to up-to-date federal and state lists and requiring consultation with federal and state agencies. See 8 regarding Vital Sign Indicators project. |
| **52** | | **NR** | Adopt standards to protect outstanding geologic features, such as the Bonneville Slide area that created the "Bridge of the Gods." | The Gorge Commission protects certain geologic features as Open Space and through its scenic protection standards. |
| **53** | | **NR** | Require protection for native plant communities. | The Management Plan requires that development and land use do not adversely affect rare plant species, including species endemic to the Columbia River Gorge and vicinity. Rare plant species are defined in Policy 1 under "GMA Policies: Rare Plants" in the Natural Resources chapter and in the Glossary. |
| **54** | | **NR** | Protect salmon and other wildlife habitat. | See 1 and 3. |

| | Page | Topic | Comment | Response |
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| 1 | | Public Comment Process | I received a copy of the draft MP and have begun reading and analyzing it and I have to say that I don't think 30 days is enough time to read, digest, analyze, and synthesize all the new and old information in almost 500 pages. Most federal comment periods are at least 45 days and some even longer. I would suggest that a comment period of 60 days is more in line with the amount of information that the public must digest and comment on.<br>You all have been dealing with this more than the rest of us and have had more time to get acquainted with the draft MP. The rest of us have been homebound because of covid 19.<br>Thank you for considering extending the comment period for the draft MP to 60 days. | Each focus topic and draft language changes for those focus topic chapters were provided to the Gorge Commission over the past two years for review and discussion. Each Gorge Commission meeting to discuss those topics also included public comment periods. The Gorge Commission believed that the public review timeline for the Draft Management Plan was adequate, and it approved this timeline at its May 2020 meeting. Since 2016, the Gorge Commission has held 156 public meetings throughout the Gorge on the Gorge 2020 Management Plan review process seeking public input. Fifty of these meetings were publicly announced Gorge Commission meetings, and the others were public workshops, open houses, stakeholder meetings, or invitations to present at local organizations throughout the Gorge. Press releases were sent to Gorge media announcing public meetings and workshops, and Gorge 2020 emails were sent to entities who signed up to receive notifications. |
| 2 | | Public Comment Process | I urge you all to make the Management Plan a Word document so that commenters can more easily make pertinent comments, observations, and edits. The document should have LINE NUMBERS so as to make comments on the pages more accessible to the staff. (I'm not talking about tracking, that would be too confusing.) PDFs are not easy. Word docs are much easier to copy and paste when making comments. I am almost done with the 500 page MP draft and don't relish having to count lines when making my very numerous comments! Could the MP draft be put on the GC website as a Word document by the 25th? Thank you. | With more than 600 public commenters, it was not appropriate to provide a Word document of the Draft Management Plan for commenters to edit. Language edits suggested by commenters were reviewed and evaluated. The Gorge Commission made the final decision on the edits to the policies and guidelines in the Gorge 2020 Draft Management Plan. |
| 3 | | Public Comment Process | The big problem I see is today, is because of the virus locally we have not had the access we need to discuss this. While online is good for some things, it is not good for working out details for groups that don't have good access. Locally in Wasco county our internet access is extremely frustrating and difficult. I would say at least the time extension Angie asked for is needed. | See 1. |

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| **4** | | **Public Comment Process** | I hope you weigh comments by the numbers of people they are representing. While individuals who commented were very extreme in their view, those representing others asked for moderation. | All comments were considered whether only one person suggested a change or if 100 people responded with the same comment. The Gorge Commission evaluated the comments for consistency with the standards in the Management Plan and will make the final decision on which edits to accept in the revised Management Plan. |
| **5** | | **Public Comment Process** | I applaud those individuals who were able to read and study this document before June 30. I only received a postcard notification in the last several days, which was the first I became aware of this important discussion. I am not a member of any interest group that follows the schedule of the Gorge Commission. Please consider extending the time to review this extensive document. I'm sure there are others who would appreciate more time for citizen review and comment. | See 1. |
| **6** | | **Public Comment Process** | Our region deserves an agency that is a strategic leader; that leads with a very full public engagement process. Unfortunately, the Plan update process has lacked a robust public engagement process. I was aware of the update and received notice from Wasco County (not the Gorge Commission). I do not mean to lay blame on the Commission. Rather, I recognize that the Commission has had fiscal issues since its inception which have resulted in staff turnover. The Commission should investigate and pursue other more sustainable funding mechanisms rather than relying on state funding. Respectfully, I'd like to suggest that the Gorge Commission consider a paradigm shift and use the Management Plan update as a catalyst for what the Commission's role could be - a Regional Planning Agency. | See 1. |
| **7** | | **Public Comment Process** | The Columbia River Gorge Commission has completed no direct public outreach to inform citizens of the potential impacts to their properties. Citizens in Oregon are used to, and expect, mailed notice consistent with ORS 215.503. | See 1. |
| **8** | | **Public Comment Process** | Written comments have not been addressed or acknowledged in public hearings by the Commission or staff. | This public comment spreadsheet compiles public comments received by topic area from June 1 through September 8, 2020 and includes responses to the written and oral comments received by the Gorge Commission. |

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| **9** | | **Public Comment Process** | There was significant gatekeeping by the Columbia River Gorge Commissioners, who on several occasions went on record at expressing distrust, doubt over credentials, or rejecting out of hand the input of partners, stakeholders and the public. | The Gorge Commission held 156 public meetings throughout the Gorge on the Gorge 2020 Management Plan review process seeking public input. Fifty of these meetings were publicly announced Gorge Commission meetings, and the others were public workshops, open houses, stakeholder meetings, or invitations to present at local organizations throughout the Gorge. |
| **10** | | **Public Comment Process** | The proposed new language for public involvement (beginning on page 419 of the draft Management Plan) is inconsistent with Goal 1 [in Oregon Statewide Land Use Planning Goals] which states "Federal, state and regional agencies and special-purpose districts shall coordinate their planning efforts with the affected governing bodies and make use of existing local citizen involvement programs established by cities and counties." This is nowhere addressed in the revised language and Wasco County was not consulted about its citizen involvement program. | The Gorge Commission is a bi-state agency established by an interstate compact. Oregon's Goal 1 does not apply to the Gorge Commission. Nevertheless, the Gorge Commission coordinated with DLCD in Oregon, Department of Commerce in Washington, and Growth Management Services in Washington. Since 2016, the Gorge Commission has held 156 public meetings throughout the Gorge on the Gorge 2020 Management Plan review process seeking public input. Fifty of these meetings were publicly announced Commission meetings, and the others were public workshops, open houses, stakeholder meetings or invitations to present at local organizations throughout the Gorge. Press releases were sent to Gorge media announcing public meetings and workshops, and Gorge 2020 emails were sent to entities who signed up to receive notifications. |

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| **11** | | **Public Comment Process** | Recommendation: 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. | The National Scenic Area Act requires that the Gorge Commission revise its Management Plan not sooner than every 5 years. With this restriction, the Gorge Commission cannot approve chapters one at a time. When the final Management Plan is approved in its entirety, it is then submitted to the Secretary of Agriculture for concurrence. If there is concurrence, then the final Management Plan is sent to the NSA counties to amend their ordinances to include the new Management Plan changes. Once the ordinances are completed, they are submitted to the Gorge Commission for approval. |
| **12** | | **Public Comment Process** | The Commission's process and reasoning for adopting these Amendments lacks transparency. The Amendments propose revisions that conflict with or were not recommended by commission staff who apply expertise to implement and administer the Act and the Management Plan and are the closest to on-the-ground issues. The Commission has apparently given little to no deference to staff's role as the overseers of this program. Similarly, the Commission has failed to give the public, including stakeholders and state agencies, adequate and meaningful opportunity for review and comment. The Commission's process for public involvement and comment raises concerns about compliance with state public meeting laws, Oregon Revised Statutes Chapter 192 and Revised Code of Washington Chapter 42.30. This lack of a meaningful and transparent public process, and a rush to institute entirely new amendments only in recent weeks, is particularly egregious during a time of a pandemic. Due to the spread of COVID-19, robust public engagement is limited. Many provisions of the proposed Amendments are beyond the legal authority of the Commission, conflict with legislative intent, and violate the Act, particularly the savings provisions. We request that the Commission (1) repeal or modify the provisions of the Amendments that violate state and federal law; (2) provide adequate advanced notice of further proceedings and revisions; and (3) extend the period for public comment. | Gorge Commission staff prepares staff reports based on analysis and consultation with partners and the public for Gorge Commission deliberation and discussion. The Gorge Commission considers staff recommendations and public comment before making final decisions on Draft Management Plan revisions consistent with the National Scenic Area Act. |

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| **13** | | **Public Comment Process** | Given the significant deviations from the draft plan, additional public review and consultation with state agencies, county government and regulated industries is necessary.<br>As a private forest landowner in the Columbia River Scenic Area, we request that the Commission withdraw the draft plan and seek additional review from private land owners impacted by the plan as well as the general public, Further, it is important that the Commission fulfill its obligation to consult with the State of Washington, and the State of Oregon, specifically consultation with both Washington Department of Natural Resources and Oregon Department of<br>Forestry is necessary as both agencies have clear authority for forest management within the Scenic Area. Results from such government-to-government consultations should be open and transparent to the public and regulated industries.<br>Given the significant deviations made from the draft plan, a 30 day comment period is insufficient for public and stakeholder engagement. Additionally, such a short comment period does not allow adequate time to consult with appropriate state agencies. At a minimum, a longer comment period is particularly important during the Covid-19 pandemic and necessary to ensure transparency with stakeholders. | See 1. There was only one Draft Management Plan posted for the June public comment period, and then a second draft posted on August 26 which incorporated edits responding to public comment and Commissioners' motions from the August 11-12 work session. |
| **14** | | **Public Comment Process** | The public comment opportunity for the Gorge 2020 Draft Management Plan edits were only brought to our attention a day before the public comment virtual meeting on June 25th and less than a week before all public comments were due. Not knowing about this public comment period until very last minute was experienced by many tourism entities in the Columbia River Gorge National Scenic Area. Because tourism has a significant impact on the economies of the region (see attached economic impact report), and edits to the plan directly impact that industry, we would have hoped for better outreach to tourism industry partners and that an extended time frame had been made for key stakeholders to read, digest, and respond to the proposed edits. | See 1. |
| **15** | | **Public Comment Process** | Encourage the Gorge Commission to consider providing additional time for public comment and push back the date to vote on Plan adoption. | See 1. |
| **16** | | **Public Comment Process** | Request an additional 30 days for public review and comment on the Draft Management Plan; need additional time for the Board of Commissioners to go through Skamania County staff comments. There is a lot of information to review, and the proposed changes will affect people for at least 10 years. An additional 30 days will not make this process more cumbersome. | See 1. |

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| **17** | | **Public Comment Process** | Acknowledged the numerous opportunities for public involvement and comment throughout the four-year Gorge 2020 process, including on the topic of Urban Area Boundary revisions. | See 1. |
| **18** | | **Public Comment Process** | The Commission's actions during the Gorge 2020 process lack transparency. The Commission has abjectly failed to consult and engage with relevant state agencies, stakeholders, or consider the recommendations of its own staff. No meaningful public outreach effort has occurred, and the Commission has repeatedly violated state open public meetings laws by holding meetings and work sessions in an effort to push through the Management Plan update with minimal public involvement, and in the midst of a global pandemic. Even without the advent of the COVID-19 crisis and attendant Stay at Home Orders, the Commission's public involvement and comment process raises concerns about compliance with state public meeting laws. See RCW 42.30 and ORS 192. Clark, Skamania, and Klickitat Counties—which comprise half of the Gorge Counties—have been limited to "ordinary and routine" business, consistent with Governor Inslee's Proclamation 20-28. Nothing about the Gorge 2020 process can be characterized as "ordinary and routine." Moreover, there is no statutory deadline controlling when the Management Plan update must be completed. Rather, the Commission is being driven by personal agendas and expiring Commissioner terms to complete the Gorge 2020 process—to the detriment of stakeholders and the public. The COVID-19 pandemic has significantly impacted the lives of many Gorge residents. By the time Gorge residents emerge from this crisis, they will find that unbeknown to them, the Commission has adopted Amendments to the Management Plan that will significantly alter their rights and responsibilities for years to come. The serious issues detailed above have also been raised by other comments submitted by stakeholders and the interested public. These comments have not been addressed or acknowledged in public hearings by the Commission or staff. Instead, these comments have been summarily dismissed by the Commission with almost no consideration as to their substance.3 The veracity of the Commission's commitment to transparent and meaningful public involvement in the Gorge 2020 process has clearly been called in to question. | See 1. As a bi-state agency, the Gorge Commission works closely with the Governors of Oregon and Washington who directed agencies in March to work remotely but remain fully operational during Covid-19. |
| **19** | | **Public Comment Process** | Adopt a comprehensive public outreach program and increase efforts to engage with relevant stakeholders, including state and federal agencies. | The Gorge Commission approved a public outreach and engagement plan in October 2017 for Gorge 2020 and approved updates and adjustments to the engagement plan at specific Gorge Commission meetings since 2018. |

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| **20** | | **Public Comment Process** | Provide substantive responses to the issues raised in this letter, as well as those raised in other public comments. | Responses to specific public comments are included in this spreadsheet. |
| **21** | | **Public Comment Process** | Extend the period for public comment and defer adoption of the revised Management Plan until such comments can be adequately considered. | The Gorge Commission believed that the public review timeline for the Draft Management Plan was adequate, and this timeline was approved by the Gorge Commission at the May 2020 Commission meeting. |

| | Page | Topic | Comment | Response |
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| 1 | | Rec | Please develop a plan to coordinate temporary closure of trails and recreational sites. Perhaps an alternate-days scheme, based on license plate digits, could work. | The multiple land owners and managers, private land owners, and interstate highways limit feasibility of this proposal. |
| 2 | | Rec | Please limit entry to the Gorge when air quality is poor and especially when fire risk is extreme. Perhaps this could be accomplished with a transponder system to allow residents to travel freely but limit tourist traffic. We would very much benefit from an operational weigh station on Highway 14 as well. | A policy has been added that supports landowners to close recreation and other sites when fire danger is high. It states: "Temporary closures and restrictions of recreation sites during critical risk periods shall be supported where adverse effects on protected resources have been identified or demonstrated." |
| 3 | | Rec | 2. Comments on recreation resources: The Rowena Special Management Area is very beautiful, but has not one official trail, even though the FS has owned much of the land for over 30 years. Several trails were originally proposed for this area in the first management plan, but nothing has happened. I hope trails will be planned, and one big consideration is that a trail should be beautiful. It should not just be planned with considerations about natural resources. A trail should also be planned with the enjoyment of trail users in mind. | If development is allowed, then a lack of trail development is dependent on land manager decisions and not a result of restrictions in the Management Plan. |
| 4 | | Rec | Page 13 Comments. Our proposed language would be consistent with the language in Part II of the Management Plan, which currently protects the rights of lawfully established development, and its use, repair and maintenance. If the goal of this new language is to allow for public recreation managers to implement their master plans without NSA permits or conduct enhancement projects for protected resources, it should say exactly that to ensure consistent rule implementation in each of the six counties and reduce barriers for positive projects initiated by government recreation managers also charged with resource protection requirements. | Changing from "established prior to Management Plan" to "legally established" would be a different standard that would require more substantial review throughout the chapter. As proposed, staff's edits address a specific issue that we heard from recreation stakeholders, which was the full scope of this particular revision. |
| 5 | 160 | Rec | Page 13 Comments. Assuming highways constructed specifically for the movement of people and freight by vehicle through topographically complex landscapes are equipped to also safely accommodate cyclists and pedestrians is a dangerous assumption. Uses should not be promoted unless their safety implications have been addressed by local emergency service providers. | Management Plan Coordination guidelines (pg. 171) incorporate coordination for new development with emergency response, law enforcement, etc. |

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| **6** | **161** | **Rec** | Page 14 Comments. This language would be more consistent with the guidelines provided on page IV-3-2, Chapter 3 – Indian Tribal Treaty Rights and Consultation. The applicant cannot modify treaty rights and cannot demonstrate the proposed development will not have an impact without consulting with tribal councils directly. The applicant should provide an assessment of affect and mitigation plan as part of a complete application for the implementing agency to provide in their government to government consultation as required by Part IV Chapter 3 of the existing Management Plan. | Use of the phrase "does not affect or modify" is standard throughout the Management Plan. Use of the term "riverfront recreation facilities" is intentional as this is in the section about river access. Other treaty rights provisions are in Part 1, Ch 2 and Part 4, Ch 3, as noted in the comment. Nothing in the Management Plan may modify or affect treaty rights. The section here is specific to one kind of recreation use that was and continues to be important in the recreation mix of the NSA. |
| **7** | **165** | **Rec** | Page 14 Comment. GMA Policy 7 identifies recreation suitability of a number of zones, except Open Space. We suggest adding a statement for Open Space, particularly because it contains sensitive resources and should be protected more specifically. | Open Space designations are based on features such as those highlighted in Policy 7.C in this section. Recreation Intensity Class (RIC) 1 was applied to all lands designated Open Space, limiting recreation use to that which requires minimal development, and that development is still subject to the resource protection standards. |
| **8** | **174** | **Rec** | Under the Recreation Resources, "Scenic Area Act Provisions" section {Page 157), new language is provided that the Act has supported Dam removal efforts to protect and enhance natural resources, which has provided additional recreational opportunities in the Scenic Area. After conducting a word search, it is unclear that any language exists. | Language was removed. |
| **9** | **157** | **Rec** | Existing Guideline l .F under Signs (Page 65) references the size and number of signs that can be posted within areas designated as Recreational Intensity Class 1 through 4. It is recommended that these standards not apply to projects associated with the Historic Columbia River Highway State Trail. The guidelines from the Historic Columbia River Highway State Trail Wayfinding Signage Plan are recommended to be used instead. For instance, we are concerned that limiting the cumulative size of needed signage in areas designated Recreational Intensity Class 1 and 2 to 50 to 100 square feet, respectively, will be insufficient in certain instances. If the Historic Columbia River Highway State Trail is considered a "recreational facility" as referenced under Guideline l.G under Signs (Page 65), which seems to provide additional allowances beyond those described under Guideline l.F., then that should be made more clear. | The Historic Columbia River Highway (HCRH) Wayfinding Signage Plan are recommendations and may not apply to all locations along the HCRH. |

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| **10** | **65** | **Rec** | Under Recreation Resources, "Recreation Intensity Class 3" - Item G (Page 177) and "Recreation Intensity Class 4" - Item C {Page 178). new language is proposed regarding facility accommodations for mass transportation (e.g. bus parking, etc.). The new language provides guidelines for "new" recreational sites. It is recommended that the standard be modified to also apply to certain "improvements to existing sites" that would have the potential to increase its overall intensity. For instance, the current segment of the Historic Columbia River Highway State Trail under review includes improvements to Viento State Park, which is designated Recreational Intensity Class 4. County staff expects that this improvement will result in more people visiting the site, especially with the Mitchell Point Tunnel proposed nearby. However, as part of this project review, County staff was unable to give any consideration of requiring bus parking or other facilities for mass transportation because the improvements involved an existing, and not a "new," recreational site. Some consideration should also be given to require mass transportation facilities for certain existing sites located in other recreational intensity class areas as well. Mitchell Point is a good example, which is designated Recreational Intensity Class 2. As noted, once the new tunnel is completed, significantly more visitors to this existing facility are expected. However, for the reasons stated above, the County was unable to consider reasonable accommodations for mass transportation as part of its recent review given the existing Management Plan language. | Added "and improvements to existing Class [3 or 4] day use recreation sites where the improvement would increase the use of the site" to these two items. |
| **11** | **178** | **Rec** | Existing Policy 7 under Trails and Pathways (Page 169) suggests prohibiting the use of "motorized vehicles on designated public use trails" except by appropriate agencies and emergency personnel. Some clarification should be included concerning "e-bikes," which are technically motorized in most cases. It is recommended that Policy 7 be amended to read: "Use of motorized vehicles on designated public use trails shall be prohibited, except for ~~use by response agencies and their agents in an emergency~~ operator-propelled vehicles. cycles or similar devices (such as electric assisted bicycles as defined in ORS 801.258), emergency service vehicles, authorized maintenance vehicles, and electric powered wheelchairs and scooters for persons with disabilities." | The land management agencies are working on considering policies for e-bikes, but it is not being included as a revision in the Draft Management Plan at this time. |

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| **12** | **169** | **Rec** | Over the years, Hood River County has processed numerous applications involving the expansion of the HCRH State Trail and improvements along 1-84. Many of these application reviews end up being quite extensive and overly complicated. Staff reports between 30-90 pages are common and reviews take months to complete. In addition to the Management Plan (and associated ordinances adopted by each Gorge county), there are also other documents that guide road/highway related improvement but not formally approved by the Gorge Commission. Such documents include the 1-84 Corridor Strategy Guidelines, Historic Highway State Trail Design Guidelines, and the Historic Columbia River Highway Master Plan Guidelines. Currently, it is assumed by ODOT that these guidelines are to be used in evaluating highway and trail related projects. It is recommended that these various guidelines be formally evaluated and adopted into the Management Plan. The Gorge Commission should also consider making all (or at least most) highway related projects, especially those occurring within the developed road prism or some distance from the centerline of the highway as either an allowed use or expedited review as long as the adopted guidelines are followed. At the very least, such highway projects should be considered exempt from certain resource standards. For example, the last constructed segment of the HCRH State Trail involved extensive development and structures, including the Lindsey Creek Bench Cut and Summit Creek Viaduct. Both structures are very prominent in the landscape and highly visible from multiple key viewing areas. Instead of having to spend a significant amount of time trying to argue that these structures conform to existing scenic resource guidelines, which they could never meet, the Gorge Commission should create more streamlined standards that would apply instead; similar to what was created for future replacement of bridges crossing the Columbia River. | Addressed in Scenic Resources Chapter comments. No change made. |
| **13** | | **Rec** | Page 169 Transportation Topic *General comment – "Mass transportation" is an outdated term. Public transit or transportation alternatives is a much more flexible and common term to address the same topic. Public transit does not have to move a large amount of people, or "mass" to be effective in achieving the Scenic Area Goals.* | This change was discussed but not made throughout the majority of the Draft Management Plan. The term "mass transportation" fits the intent in the Plan to encourage public and private transportation alternatives to single occupancy vehicles. |
| **14** | **169** | **Rec** | GMA Objective 2. Encourage *mass* transportation alternatives *and modal priority* to important recreation facilities that offer both access to such sites and recreation experiences themselves. *ODOT recommends removing "mass" ahead of transportation as transportation alternatives include transit and add "modal priority" after "alternatives" so that land managers have the ability to plan how to prioritize those arriving at sites using various transportation modes.* | The term "modal priority" was not added to the Draft Management Plan because of limited availability of staff to consider implications of including and defining this new term, and land managers have discretion under the Management Plan to prioritize alternatives to single occupancy vehicles, given that development is allowable. |

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| **15** | **169** | **Rec** | Page 185 SMA Policy 6 Existing language includes “Comprehensive recreation resource planning shall be encouraged to foster a unified, regional approach and de-emphasize jurisdictional divisions.” ODOT suggests the above SMA policy language to be included in the GMA policy language found on page 163. | SMA language is more concise, but GMA language under "Coordination" Goals, Objectives, and Policies describes the same regional approach. |
| **16** | **163**<br>**185** | **Rec** | GMA Objective 2 and 3, Trails and Pathways, Page 167. Friends recommends combining the two into one objective. Combining the two objectives that share the goal of connectivity makes sense as communities work to connect to one another through trail systems. | Staff reviewed and consider the two as separate objectives, though they are related. |
| **17** | | **Rec** | GMA Objective 6.D, Trails and Pathways, Page 168. Friends recommends keeping objective as is. The Scenic Area is inextricably linked to public and conserved lands adjacent to its boundary and removing this objective lowers the possibilities of significant trail systems in the future. In addition, as natural disasters can impact current trail connections that run both in and outside the boundary of the Scenic Area, Friends has concerns that elimination of this objective can impede future reconnection efforts. We would like more clarity on the necessity of eliminating this objective. | This was removed because it proposed a specific type of trail. Where trails are allowed, land managers and their policies direct how trails are constructed. Further, connectivity between trails is a consideration in the new Objective 1 in this section. |
| **18** | | **Rec** | GMA Policy 8, Trails and Pathways, Page 169. Friends recommends keeping objective as is. Completing and improving existing trails, completing incomplete trail loops and segments should remain a priority in the Scenic Area and remains a priority among the agencies’ trail steward partner groups. | See 17. |
| **19** | | **Rec** | GMA Guidelines, Approval Criteria for Recreation Uses 1.D(3), Page 179. Friends recommends rewording the objective. The new language can be interpreted broadly and we believe that specific measures, such as installing boot brushes, will provide tangible benefits. | This was purposefully left open for the land managers to make the determination of the best available tool to reduce the potential spread of noxious weeds. Staff had originally proposed boot brushes, and examples were given why it would be detrimental to require them in certain locations. |
| **20** | | **Rec** | GMA Guidelines, Approval Criteria for Recreation Uses 1.D(4), Page 180. Friends recommends rewording this objective. The new language provided by staff is difficult to understand and our edits are proposed to clarify and simplify the language | Change made for readability, though retained reference to "critical fire risk periods." |
| **21** | | **Rec** | GMA Objective #2 and #3, Trails and Pathways, Page 167. We recommend combining the two into one objective. Combining the two objectives that share the goal of connectivity makes sense as communities work to connect to one another through trail systems. | See 17. |

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| **22** | | **Rec** | GMA Objective #6D, Trails and Pathways, Page 168. We recommend revising this objective. Coordinating trail construction and maintenance across agency boundaries is inherently more complex, thus the default is a tendency to look inward rather than across borders. The Scenic Area is inextricably linked to public and conserved lands adjacent to its boundary. Retaining this objective highlights the importance of viewing the landscape as a whole and seeking trail system solutions that are comprehensive. In addition, as natural disasters can impact current trail connections that run both in and outside the boundary of the Scenic Area, we have concerns that elimination of this objective could lead to a more fragmented trail system. We would like more clarity on the necessity of eliminating this objective. | See 17. |
| **23** | | **Rec** | GMA Policy #8, Trails and Pathways, Page 169. We recommend keeping objective with a minor revision for clarity. Although new trails may be the best solution in some instances, in general, evolving the existing infrastructure to meet modern sustainability design criteria and best practices for congestion management will yield the best return on investment. | See 17. |
| **24** | **169** | **Rec** | GMA Guidelines #1D(3), Approval Criteria for Recreation Uses, Page 179. We recommend rewording the objective. The new language can be interpreted broadly and we believe that specific measures, such as installing boot brushes, will provide tangible benefits. | See 19. |
| **25** | **179** | **Rec** | GMA Guidelines #1D(4), Approval Criteria for Recreation Uses, Page 180. We recommend that land managers consider the potential for wildfire hazard, but are concerned that a formal “evaluation” will become a burden that doesn’t produce new, useful information. Rather we suggest that recreation managers consider existing community wildfire protection plans and their own agencies wildfire management directives. | See 20. Land managers may rely on community wildfire protection plans and their own plans as evidence of preparedness. |
| **26** | **180** | **Rec** | GMA Policies, #4 Page 171. We recommend that recreation providers consider law enforcement and safety concerns, but don’t believe there is a need to require consultation. Our understanding is that state and federal land managers have open lines of communication with law enforcement, public safety and emergency service providers already. Our concern is that a required formal “consultation” will become a burden that doesn’t produce new, useful information. | Existing language, no change proposed here. Consultation with enforcement agencies happens as described in the comment. |

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| **27** | **171** | **Rec** | Add plan components for the PCT: Desired Conditions/Goals; The nature and purposes of the Pacific Crest National Scenic Trail (PCT) are to provide for outstanding journeys on foot or on horseback along the spectacular landscapes of the high Pacific mountain ranges. Tranquility and closeness with nature can be found consistently along the trail, evoking a feeling of extended retreat from civilization, even if only venturing out for a day. Guidelines; New recreation events, such as foot races, horseback endurance events, fundraising events, and other large group events should be limited to designated PCT crossings only to minimize conflicts with the nature and purposes of the PCT. Existing recreation events on the PCT may be allowed to continue at current levels. New trails that are proposed to cross the PCT or to be built within the foreground of the PCT, should be designed to minimize conflicting uses and to minimize the scenic, natural, and recreation impacts to the PCT. Place priority on the purchase of lands or interest in lands necessary to protect the Pacific Crest Trail experience as delineated in the Pacific Crest Trail land acquisition inventory, and the 2006 PCT Optimal Location Review. | This is based on the 2012 USFS planning rule, and is not something that the Management Plan can address specifically. |
| **28** | | **Rec** | The policies in the recreation section do not constitute a **comprehensive plan** for recreation and without it these problems will continue to grow. We believe the agencies and partners should work together towards a comprehensive review of the current and future recreation concerns that exist throughout the Gorge. | The chapter is not intended to be a comprehensive plan for recreation development. There are many land managers and stakeholders in the NSA with their own recreation management policies. The Management Plan only manages what recreation development is allowed. Recreation managers and stakeholders are engaged in NSA-wide coordination efforts outside of the Management Plan. |
| **29** | | **Rec** | Delete “accessible (regardless of income level, ethnicity, gender, ability, or age)” and put in “accessible, non-discriminatory." | Before this phrase is the term "equitable" which meets the purpose of this comment. Similar phrasing exists throughout the Draft Management Plan. |
| **30** | | **Rec** | Can the GC and the USFS work more closely with landowners to provide paths on private property? | Where trails are allowed, trail development on private lands is a decision for the landowners. Trails are widely allowed throughout the NSA. |
| **31** | | **Rec** | The GC will coordinate with the USFA, local governments and agencies on creating a ONLINE GUIDE that is updated hourly for recreation areas, a guide that is accessible so the public can see how much use each area is getting at any one time; cameras and counters may have to be installed at the most used recreation sites. | This comment is beyond the scope of the Management Plan. Agency coordination may, in time, result in a system like this, but it would not need NSA approval in order to be implemented (beyond review of any development associated with implementing the system). |
| **32** | | **Rec** | Support requirement for coordinating temporary closures of recreation sites and trails when fire risk is high and when there is a public safety power shut-off by Pacific Power and Light or PGE. | See 2. |

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| **33** | | **Rec** | Consider requiring temporary closure of trails when the fire danger is extreme, as it was when the Eagle Creek fire ignited. | See 2. |
| **34** | | **Rec** | Support policies for trail systems linking recreation sites, viewpoints and Gorge communities. | New and existing policies support this outcome. See 16 and 17. |
| **35** | | **Rec** | Promote more dispersed recreation by supporting new recreation sites and discouraging overuse of existing sites. | New recreation sites are allowed subject to existing and proposed review standards, and nothing in the Management Plan stops their development. New recreation characteristic descriptions encourage management for recreation experiences, including visitation density. |
| **36** | | **Rec** | Support sustainable recreation through alternative transportation options. | Language supporting alternative transportation has been included throughout the Draft Management Plan, including requiring alternative transportation options in RIC 3 and allowing them at RIC 1 and 2. |
| **37** | | **Rec** | Improve river access but avoid adverse impacts to sensitive resources and treaty rights. | These provisions are already present in the Management Plan. |

| | Page | Topic | Comment | Response |
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| 1 | | Scenic | The Scenic Resources revisions recognizing the scenic value of the agrarian landscape with a nod to changes in scenery as trends in agriculture continue to evolve. The introduction of the Agriculture Designation chapter contradicts that statement, implying that agriculture can be detrimental to scenic resources. Consistency and clarity of intent are key for future implementation, particularly as counties adopt subsequent revisions to their Scenic Area ordinances. | Changes to the landscape settings with regard to agricultural features of the landscape acknowledge the presence of those agricultural features. These tie in with the existing standards for review of ag structures and development. New cultivation is allowed without scenic review, while ag buildings must be the minimum size necessary to meet the need. The new language in landscape settings defines what we expect to see, while the standards for review uses define how we expect to see it. There has been no substantive change in how the allowable agricultural developments are reviewed. No change necessary. |
| 2 | 24 | Scenic | Page 11 comments. The Scenic resources of the Gorge are its natural, cultural, and recreational resources. Proposal Should be: The natural, cultural, and recreational resources are the scenic resources of the Gorge. We think this is what you meant to say. As drafted, the statement is not factual and is misleading. There are many natural, cultural and recreational resources worthy of protection that have no relationship with the landscape level protected scenic resources of the Gorge. The scenery certainly contributes in a significant way, but is not universal for all protected resources. | Staff changed the language to read: "The natural, cultural, and recreational resources of the Gorge are an inherent part of scenic resources." |
| 3 | 42<br>72 | Scenic | Page 11 comments. Topographically screened development poses no risk to scenic resources. As such, there is no nexus for this requirement and requiring it may cause an unnecessary financial hardship for residents and litigation risk for counties. Not all residents have the financial means to construct a new stick built home; many prefabricated homes, products and mobile homes are not non/low-reflective. | All of these apply only to topographically visible development, so the removal of the language reduces redundancy and doesn't add any additional restrictions on development not topographically visible. |
| 4 | 60 | Scenic | Developed Settings and Visual Subordinance Policies…4. Murray's Addition subdivision, Foley Lakes, and lands located inside the Urban Growth Boundary of the city of The Dalles west of Chenowith Loop Road. The Dalles (Residential). Rationale: These lands contain some of the most dense development in The Dalles and currently serve the city. Requiring visual subordinance is impracticable and unrealistic. As well, they are topographically screened from nearly all KVAs outside of Urban Areas. | This would be a policy change to add areas that are exempt from scenic standards, which is outside the scope of technical review. |
| 5 | 36 | Scenic | Modification to the compatibility should be modified to allow for exemptions for certain minor buildings. Suggest "exempt any building under 2500 square feet in size." | The Gorge Commission adopted a 1500 square foot exemption from the compatibility standard at its August 2020 meetings. |

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| **6** | **36** | **Scenic** | Comment page 2. Guideline 2, clarify what compatible means. | A white paper was provided to counties on how to determine compatibility in early 2020, which is what the new compatibility guidelines are based on. The Management Plan currently allows the counties to make the determination on how to interpret the guidelines, and expanded guidelines provide guidance on how to interpret. |
| **7** | **40** | **Scenic** | Clarify how to determine cumulative effects on scenic resources. | The Vital Sign Indicators (VSI) monitoring project and ongoing scenic mapping will help determine the baseline and changing conditions over time. |
| **8** | **42** | **Scenic** | Removing vegetation from skyline may be seen as a takings where no viable alternative. | The Gorge Commission adopted a new definition of Skyline at its August meetings: "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 except in existing, densely forested landscapes with thick, unbroken coniferous tree cover characteristic to its setting, the skyline may be formed by the top of the vegetative canopy." |
| **9** | **44** | **Scenic** | May be worth reviewing current FCC regulations for "small cell" towers to determine how they may affect implementation of guidelines 17, 18 under KVAs. | Comment refers to what are now GMA KVA guidelines 15 and 16 in the Draft Management Plan. This suggestion is outside the scope of technical review. |

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| **10** | **366** | **Scenic** | Recently, Hood River County and other jurisdictions met to discuss the proposed Hood River-White Salmon Bridge Replacement project. As part of this process, the Port of Hood River and their consultant BergerABAM were attempting to develop a preliminary plan and conduct an environmental assessment in compliance with the National Environmental Policy Act (NEPA). In developing its plan, the Port of Hood River and its consulting team were attempting to understand the NSA guidelines that would apply. It was difficult for staff from the Gorge Commission and Hood River County to clearly define the requirements that would apply to the new bridge. The major question that arose involved whether the visual quality objectives under the Columbia River Bridge Replacement section of the Management Plan (Pages 366-368) were to be applied alone or together with other scenic guidelines found elsewhere in the Management Plan. It was assumed that the standard scenic standards/objective, such as visual subordinance, would not apply, but it was not clear. It is, therefore, recommended that language be provided under this section to clarify that the visual quality objectives listed under the Columbia River Bridge replacement section of the Management Plan are the only scenic standards intended to be applied to bridge replacements crossing the Columbia River. | Change made to Part 2, Chapter 7 regarding the scenic standards for the Columbia River Bridge Replacement. "A replacement bridge is exempt from the GMA provisions in Part I, Chapter 1: Scenic Resources, but shall comply with the following visual quality standards:"<br><br>Staff continue to work with BergerABAM, Hood River County, and other stakeholders to ensure that the Management Plan standards are met and reduce any confusion in the process. |

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| **11** | | **Scenic** | Over the years, Hood River County has processed numerous applications involving the expansion of the HCRH State Trail and improvements along 1-84. Many of these application reviews end up being quite extensive and overly complicated. Staff reports between 30-90 pages are common and reviews take months to complete. In addition to the Management Plan (and associated ordinances adopted by each Gorge county), there are also other documents that guide road/highway related improvement but not formally approved by the Gorge Commission. Such documents include the 1-84 Corridor Strategy Guidelines, Historic Highway State Trail Design Guidelines, and the Historic Columbia River Highway Master Plan Guidelines. Currently, it is assumed by ODOT that these guidelines are to be used in evaluating highway and trail related projects. It is recommended that these various guidelines be formally evaluated and adopted into the Management Plan. The Gorge Commission should also consider making all (or at least most) highway related projects, especially those occurring within the developed road prism or some distance from the centerline of the highway as either an allowed use or expedited review as long as the adopted guidelines are followed. At the very least, such highway projects should be considered exempt from certain resource standards. For example, the last constructed segment of the HCRH State Trail involved extensive development and structures, including the Lindsey Creek Bench Cut and Summit Creek Viaduct. Both structures are very prominent in the landscape and highly visible from multiple key viewing areas. Instead of having to spend a significant amount of time trying to argue that these structures conform to existing scenic resource guidelines, which they could never meet, the Gorge Commission should create more streamlined standards that would apply instead; similar to what was created for future replacement of bridges crossing the Columbia River. | This is outside the scope of technical review. All developments must meet all applicable scenic review guidelines. |
| **12** | **485** | **Scenic** | There are few places in the western part of the Columbia River Gorge where "the surface of the earth meets the sky" as much of the skyline is created by the top of the forested canopy. The revised definition is more confusing, more restrictive, and offers no additional resource than the current definition. This definition should not be changed. | The Gorge Commission adopted a new definition of Skyline at its August meetings: "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 except in existing, densely forested landscapes with thick, unbroken coniferous tree cover characteristic to its setting, the skyline may be formed by the top of the vegetative canopy." |

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| **13** | **488** | **Scenic** | The proposed revision to the definition of "visually subordinate" at page 488 includes edits that better correlate to the new emphasis on landscape settings, however the standard is changed significantly by the addition of language that states visually subordinate structures "would be difficult to discern to the common viewer." This language should be removed and the original, "They are not visually dominant in relation to their surroundings," should be added. | The revised definition uses "plain language" and does not significantly change the meaning of the definition. |
| **14** | **36** | **Scenic** | The Gorge Commission can less the burden for review agencies and provide some predictability to applicants by requiring compatibility studies only for the largest development proposals. Homes under a certain size limit (2,500 sq. ft. for example) should be deemed compatible outright. For accessory buildings, the land use designations already limit building size to 1,500 sq. ft. No compatibility study should be required for buildings that comply with this limit. | The Gorge Commission adopted a 1500 square foot exemption to the compatibility guidelines at its August 2020 meetings. |
| **15** | | **Scenic** | Removal of existing variance language may result in takings claims if this standard prohibits any viable economic use of a property | This is a streamlining edit. Variances are allowed under Policy 1 of the Overall Scenic Provisions, and are allowed by Commission Rule upon appeal of a denied application and demonstration of a takings. |
| **16** | | **Scenic** | Removal of the statement "on lands seen from key viewing areas" may inadvertently affect the ability for applicants to use more reflective materials on elevations facing away from key viewing areas. Applicants may sometimes include large windows or metal roofing on elevations that are screened from KV As by the building itself even when the site itself is otherwise visible from key viewing areas. | The Gorge Commission added this language back in to the guideline at its August 2020 meetings. |
| **17** | | **Scenic** | Like the standards for use of existing colors on building additions of less than 100%, applicants should be allowed to use the same roofing material on additions of less than 100%. | This is outside the scope of technical review. The color of roofing material may match the existing structure but is otherwise subject to scenic review standards. |
| **18** | | **Scenic** | The Current Plan offers no definition of the phrase “scenic resource.” | Scenic resources are those that we see, perceive, and sense as contributing to our sense of place throughout the National Scenic Area. The guidelines in the Management Plan were developed to identify how to protect the scenic resources as required by the Act. |

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| **19** | **477** | **Scenic** | Glossary, Page 477: Key viewing areas definition was clarified to include associated parking areas, rest areas, gathering spots, and trailheads. The Historic Columbia River Highway includes the Historic Highway State Trail. *It is not clear from the language if the rest areas, gathering points, roads and trails are existing or future, and ODOT staff recommends clarification that the KVAs are only for existing facilities cited above, not those in design or under consideration. The majority of ODOT's projects in the Gorge consist of creating Key Viewing Areas (The Historic Highway State Trail, associated parking areas, gathering spots, and trailheads), and it creates confusion as to from where we are meant to do our visual analysis.* | In submitting an application to make an addition or change to part of a Key Viewing Area (KVA), that part of the KVA becomes "identified" per the definition of KVA in the Glossary and is therefore part of the KVA. As such, the application should be reviewed for consistency with the KVA guidelines as visible from the identified area of the proposed change or addition. This review will necessarily rely on site plans and drawings rather than on evaluation from existing KVAs, but the review can occur nonetheless. Fundamentally, the public will view the National Scenic Area from the identified area of the proposed change or addition, so no feature of that change or addition should be discordant with the landscape from those places that the public will, in the future, be able to visit." |
| **20** | **477** | **Scenic** | Glossary, Page 477: Key viewing areas definition was clarified to include associated parking areas, rest areas, gathering spots, and trailheads. The Historic Columbia River Highway includes the Historic Highway State Trail. It is not clear from the language if the rest areas, gathering points, roads and trails are existing or future, and ODOT staff recommends clarification that the KVAs are only for existing facilities cited above, not those in design or under consideration. The majority of ODOT's projects in the Gorge consist of creating Key Viewing Areas (The Historic Highway State Trail, associated parking areas, gathering spots, and trailheads), and it creates confusion as to from where we are meant to do our visual analysis. | See response 19 above. |
| **21** | **35** | **Scenic** | GMA Policy #1, Management Plan Page 35. Friends recommends deleting this policy or clarifying it based on the Oregon Supreme Court's decision that GMA Policy 1 requires developments to comply with the applicable scenic standard to the maximum extent practicable or be denied. | This is a policy level change that was outside the scope of the scenic review |
| **22** | **35** | **Scenic** | GMA Policy #2, Page 35. Agriculture and forest practices. This policy exempts agriculture and forest practices from regulation under the scenic chapter. Clarify that conditions of approval requiring retention of vegetation for screening development from KVAs is an exception to this policy. | This item was considered; however, the Draft Management Plan currently provides measures to protect this resource through existing guidelines. |

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| **23** | | **Scenic** | GMA Policy 6, page 36. New development called for in the National Scenic Area Act. This policy does not require full compliance with the scenic standard. This presents a fairness and equity issue where private and other public development is held to a stricter standard. All development should meet the applicable scenic standard. Delete “to the maximum extent practicable” from this policy. | This is a policy level change outside the scope of technical review. |
| **24** | | **Scenic** | GMA Guideline 2, Page 36. Compatibility. New development is required to be compatible with the general scale of existing nearby development. Expansion of existing development must be compatible to the maximum extent practicable. This guideline has not been consistently applied throughout the scenic area and has been the subject of several appeals. The guideline should be clarified to expressly require compatibility in exterior visible volume and exclude buildings that are significantly larger than the rest of the buildings from the compatibility analysis. The term “maximum extent practicable” should be deleted. The compatibility standard is lacking in the SMA and needs to be added. | Changes to this guideline add clarity to how Gorge planners have collectively interpreted the compatibility guidelines to date, which includes the dimensions of the proposed and nearby development. Outlier developments are also excluded. |
| **25** | | **Scenic** | Compatibility of new development in the SMAs. The SMA scenic resource guidelines lack any compatibility requirements. Add the GMA compatibility guideline to the SMA section. | Forest Service adopted the GMA Compatibility guidelines, as revised by the Gorge Commission at its August 2020 meetings, into the SMA guidelines. |
| **26** | | **Scenic** | New Guideline, Page 40. Railroads. Clarify that new rail development, including new tracks, must meet the applicable scenic standard. Evaluation of the scenic impacts must include the trains that would travel on the new rail development or are paused or stored on proposed sidings or double tracks. | This proposal is outside the scope of technical review. |
| **27** | | **Scenic** | New Guideline, Page 40. New roads and parking areas. Clarify that the evaluation of new roads and parking areas for compliance with the applicable scenic standard must include the vehicular use of the road or parking area. | This proposal is outside the scope of technical review. |
| **28** | | **Scenic** | GMA Guideline #2, Page 40. Siting to achieve visual subordinance: Siting new development to achieve the visual standard is required unless it conflicts with natural resource protection buffers. The Commission staff has proposed to require new development to comply with this guideline to the maximum extent practicable. Friends recommends adding new language requiring berms and vegetation to meet the visual subordinance standard. | This proposal is outside the scope of technical review. |
| **29** | | **Scenic** | GMA Guideline #3, Page 40. Cumulative effects. The Act prohibits adverse effects to scenic resources. The Management Plan currently requires evaluation of cumulative effects, but does not explicitly prohibit adverse effects to scenic resources. The existing language should be clarified to explicitly prohibit adverse cumulative effects. | The definition of "Adversely affect or Adversely affecting" was added to the Glossary in the Management Plan as per the Gorge Commission's decision on February 9, 2016. |

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| **30** | | **Scenic** | GMA Guideline #4, Page 41. Conditions applied to proposed development to achieve visual subordinance. Further clarify Guideline #4 to establish a hierarchy of conditions to achieve visual subordinance starting with the most permanent, which is siting. First and foremost, new development should be sited to achieve visual subordinance. | Staff proposed revisions to this guideline, which were reviewed and amended by the Gorge Commission at its August 2020 meetings to include a hierarchy based on permanence of visual features and alignment with other resource protection policies regarding minimizing earth movement. |
| **31** | | **Scenic** | Guideline #5, Page 41. Topography and vegetation. Topography must be given a higher priority over existing vegetation for siting new developments because it is more permanent. Site plans and conditions of approval must require new landscaping to be sufficient to screen the development within five years. If it does not, then it becomes an enforcement issue. Requiring additional screening vegetation five or more years after the land use decision is final is impractical and may raise finality issues. Delete the last sentence in guideline 5B. | Topography was given higher priority in the guidelines for new development in the Draft Management Plan. |
| **32** | | **Scenic** | GMA Guideline #10, Page 42. Non reflective or low reflective materials. Continuous glass surface must be minimized on the exterior of buildings visible from key viewing areas. Year-round screening must be required for glass surfaces on portions of new buildings that would be visible from key viewing areas. | The existing guidelines require screening to meet scenic standards and do not preclude screening vegetation for glass surfaces. Year-round screening is outline in the Scenic Resources Implementation Handbook. |
| **33** | | **Scenic** | SMA grading guidelines are needed: Substantive standards regulating grading need to be added to the SMA guidelines. | All grading plans developed for actions within the SMA are currently reviewed by the reviewing agency for consistency with the Management Plan and there was no identified need for further clarification. |
| **34** | | **Scenic** | Screening trees in all landscape settings, Pages 48-60. All landscaping required for screening purposes should provide year-round screening. However, the landscape setting guidelines require that only ¼ to ½ of trees planted for screening purposes be coniferous for winter screening. In the Grassland setting, screening trees are discouraged and there is no requirement for coniferous trees when screening vegetation is required. This severely limits the ability to render new development visually subordinate. | New vegetation in this landscape setting included this condition based on the dominant vegetation types within the landscape setting. |
| **35** | | **Scenic** | Replaced the word “shall” with “may” in the provisions relating to the new production and/or development of mineral resources, and the expansion of existing quarries is impermissible and a clear violation of Act. | Change from "shall" to "may" is a clarification edit made in several places that aligns the specific review use or standard with the overall requirement that development is reviewed under all applicable standards. |

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| **36** | | **Scenic** | There is no way that the GC can protect scenic, cultural, recreation, and natural resources AND condone continued population growth which requires more economies to support that growth, and on and on. You must consider ALL development for cumulative impacts to NSA resources. | Developments are reviewed for cumulative impacts to resources. The Gorge Commission has no position on whether population growth should or should not occur. The Gorge Commission must balance its two purposes as stated in the Act. |
| **37** | | **Scenic** | Information on our complex geology should be included in the Draft MP. | Outside the scope of a technical review. The Gorge Commission protects certain geologic features as Open Space and through its scenic protection standards. |
| **38** | | **Scenic** | Other landforms for eastern gorge should include mesas. | Changes made to landscape setting descriptions initially did not include mesas, because they were components, but not a defining characteristic of eastern gorge landscapes that the FS Landscape Architects that reviewed the landscape settings identified. |
| **39** | | **Scenic** | Native vegetation use should be mandatory in all development and re-development. | Overall, this would be a policy change and is therefore outside the scope of technical review. That said - several changes were made throughout the plan to reference native vegetation, and the Scenic Resources Implementation Handbook specifically recommends native plants for screening. |
| **40** | | **Scenic** | Remove the reference to the Broughton Mill Development. | Reference to approved resort application is outdated, but Broughton Mill is still a "Village" landscape setting. Potential future clarification edit but no change necessary at this time. |
| **41** | | **Scenic** | Forest and agricultural practices that are detrimental to the preservation, conservation, and enhancement of the NSA's resources should be called out and stopped. | Agricultural development, where allowed, is reviewed for resource impacts under our guidelines, ensuring their preservation, conservation, or enhancement. Forest practices, where allowed, are allowed outright, according to the Act's savings provisions. |
| **42** | | **Scenic** | No more quarries in the NSA. | Development of mineral resources is allowed by the Act, the Management Plan includes specific guidelines to prevent impacts to protected resources. |
| **43** | | **Scenic** | No new development of mineral resources should be allowed. | See 42. |

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| **44** | | **Scenic** | Of particular concern are the language changes to the General Management Area Policies, within the Scenic Resources Chapter. The revisions have replaced the word “shall” with “may” in the provisions relating to the new production and/or development of mineral resources, and the expansion of existing quarries. See DRAFT MANAGEMENT PLAN, 39 (2020). This change was not noted in any summary document posted on the Commission’s website and effectively imbues the Commission with discretion to approve or deny an application for a new mining use, or expansion of an existing use, regardless of demonstrated compliance with all Scenic Resource provisions. This is impermissible and a clear violation of Act. These revisions directly impact the rights and responsibilities of existing and prospective mining uses within the NSA, including the Washougal Pit. The Act unambiguously provides for the exploration, development, and production of mineral resources. 16 U.S.C. § 544d(d)(9). Upon demonstration that a prospective or existing mining use can occur without adversely affecting the SNCRs, it must be approved. This is not discretionary. However, the proposed Amendments abrogate the plain language of the Act—they provide the Commission with discretion to approve or deny an application, apparently on a whim. Simply put, a mining use “may” be permitted, upon demonstration of compliance with the standards for Scenic Resource protection. Nothing has been articulated to explain what more a prospective applicant can do to obtain land use approval, beyond demonstrating compliance with all relevant review criteria. Even then, an application may be denied. One must ask the question—under what authority? | See 35. |
| **45** | | **Scenic** | Limit "trophy homes" on scenic landscapes. Determine whether scenic landscapes are approaching the tipping point for overdevelopment and, if so, require additional scenic resource protection measures. | All development must comply with the scenic guidelines. Development that complies with the guidelines, other resource protection guidelines, and other application requirements, is allowed. |

| | Page | Topic | Comment | Response |
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| 1 | | UAB | In regards to changes to the Management Plan for **urban area boundary revisions**, I believe that no demonstrable need has been shown for these revisions:<br>For example in The Dalles:<br>There are empty buildings and lots both downtown and on the west end of town. Nonindustrial uses have been allowed in the industrial area over the years which have contributed to empty space elsewhere. At some point if Google decides to relocate the result will be empty space in the industrial area. If the economy continues to take a downturn, there will be even less growth and demand for buildable land in the foreseeable future. Economies expand and then contract over time. Please prevent urban sprawl into the Scenic Area by requiring regional analysis of development potential and ensure that any urban boundary revisions are truly minor in scale. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August and September meetings. The Gorge Commission retained policy 10.B which requires regional analysis, and adopted new language for policy 8.B which sets a limit for the term minor, stating: "An urban area boundary revision that cumulatively, over time, expands the size of an urban area by more than 50 acres or 2%, whichever is less, is not minor." |
| 2 | | UAB | Second, there is a greater threat to the Gorge than ever before. Because of the placement of the **urban growth boundaries** by your predecessors, The Dalles has not been able to grow with the times. We have had tear down schools to make room for housing. We have had to leave buildings condemned because we cannot rebuild them into usable space. We have been denied basic civil conveniences such as city sewer and water because our house is on the wrong side of the street. Our population has doubled in the last 5 years and more people keep coming, but because there is no land housing prices have soared past the point most people can reasonably pay for them. Even access to law enforcement is limited by the gorge commission. If a wild animal was to attack a family rescue wouldn't come for at least twenty minutes. All of these problems could be solved if the city was allowed to grow, but without your support we will remain an island on the land. We do not want to diminish the beauty of this place. I think that there can be a balance, just like how Hood River is allowed to grow its boundary back towards the fields of Mt. Hood, so too The Dalles should be allowed to grow back towards central Oregon away from the river and extending the town in a safe and environmentally friendly way. Please support our cities growth before the growing population expands places up and down the river instead of back and up into the plains. Please support The Dalles' growth up and back to protect both the Gorge and the people that call it home. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August and September meetings, and retained the policies in the Draft Management Plan. |
| 3 | | UAB | Your proposed changes to **urban growth boundary area** revision language essentially would eliminate any future growth outside of current urban growth boundaries, contrary to what was established Oregon's Land Conservation and Development Statute that was in place well prior to the Scenic Act. Frankly, it appears, to me, that the outcome of the Scenic Area Act is becoming just as the naysayers predicted. I encourage you to step back, from the proposed revisions, and each of you commissioners put yourselves in the shoes of us who live in, and care for the land in the Columbia River Gorge. If you do this, you just might see what your proposed actions would do, to us. | See 2. |
| 4 | | UAB | We support the passage of **Resolution 20-008 in Wasco County**. We do need the Gorge Commission to decide how our County should be run. | The two sentences are contradictory. Commenter addressed this in a later comment, that supercedes this one. |
| 5 | | UAB | I support the passage of **Resolution 20-008**. We need to protect the property rights of **Wasco County** residents. I oppose the proposed amendments to the National Scenic Area Management Plan which would severely impact the value and us of property in the future for rural Wasco County residents. This would severely limit the ability for urban areas to grow. We need land to create jobs and tax base. | See 2. |
| 6 | | UAB | I strongly oppose your proposed UGB proposal in the amendments to the Gorge Management Plan. I am a past The Dalles Chamber board director and member of their economic development committee, and a current member of the Wasco County Economic Development committee. I am also a long time board member of the Wasco County Farm Bureau. All of these positions have informed me of the importance of economic growth and that is stifled by the limitations on UGB expansion which you propose. If your goal is to permanently make Gorge communities the backyard playground for Portlanders there is no better way to accomplish that. Please execute your obligation to Goal 2 of the Columbia Gorge National Scenic area and give us the ability to expand our UGB's and have the opportunity for growth that is so vital. | See 2. |
| 7 | | UAB | My feeling and direct concern is that if the Commission continues in the current direction the urban areas will soon stagnate and die. I do realize that some areas are able to (at least on the surface) get along with tourists dollars, but not all areas are able to continue on that economic path.<br>Changes to the **urban boundary area** wording should attempt to straighten out the ambiguity of the original act and define a direct pathway for reasonable growth of our urban area, while protecting our Gorge and protecting the life style of each community. The proposed changes are beyond my comprehension. A onetime change that would allow 20 acres or 1% of the existing urban area whatever is less! REALLY?!? In my opinion and of many others, that is a formula for economic disaster in the Gorge. And that is absolutely not consistent with the stated purpose of the Act which expressly gives urban communities the ability to grow. | See 2. The Gorge Commission adopted a maximum change of 50 acres or 2% in policy 8.B at it's August meetings. |
| 8 | | UAB | And on a final note, when the lines for the Scenic area were finally defined on the Oregon side by a survey (think you for doing this finally by the way) why in the world were things done like putting Chenoweth Middle School outside the urban growth boundary? | This comment appears to be referring to The Dalles Urban Growth Boundary which is different than an urban area boundary in the Management Plan. The school is within the Urban Area, which is larger than The Dalles Urban Growth Boundary. |

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| **9** | | **UAB** | Urban expansion should be restricted, but reasonable. | The Gorge Commission's draft policies on urban area boundary revision represent its views on the balance between the two purposes of the Act. |
| **10** | | **UAB** | To preserve the Gorge NSA, the Commission MUST prevent urban sprawl. Existing land use laws are NOT sufficient to do this for two reasons. First, they apply to each incorporated city individually. The NSA needs to institute a regional, not city-based, analysis of development potential. And second, **urban boundary revisions** are made and implemented by individual cities, who will each have differing approaches and ideas on what a "minor revision" is. The Commission should provide a uniform definition of "minor revision," to be up to 20 acres or 1% of the land area of the urban area, whichever is less. In addition, this calculation should be cumulative over time. | See 1. |
| **11** | | **UAB** | CORRECTION - We support the passage of Resolution 20-008 in Wasco County. We do NOT need the Gorge Commission to decide how our County should be run. | This comment supercedes the previous contradictory comment. See 2. |
| **12** | | **UAB** | I strongly support, along with a majority of Gorge Commissioners, new policies to limit urban sprawl by requiring a **regional analysis** of the development potential in all existing urban areas and **defining "minor** revision" to be up to 20 acres or 1% of the land area of the urban area. Please ensure these provisions make it into the final management plan. | See 1. |
| **13** | | **UAB** | We **support** the position that the Gorge Commission has taken on the Urban Growth Boundary, regarding the development of a reasonable definition of **"minor revisions"** and the inclusion of that very restricted definition, and "boundary" in the draft Plan. We are very concerned about the fairly unanimous effort by our City and County elected officials, and staff, to have this component of the draft Plan set aside in favor of a much, more generous interpretation of the term "minor revisions" which most likely lead to a large expansion of The Dalles and Dallesport Urban Growth Boundaries, in particular, and the other Incorporated Cities within the Columbia Gorge National Scenic Area, in general. We adamantly oppose that endeavor. We understand that the mission of the Scenic Act is "to protect scenic, natural, cultural and recreational resources from adverse effects." We believe that allowing for larger, rather than minor, expansions of Urban Growth Boundaries of Incorporated Cities within the Gorge would be in direct conflict to this stated goal. We have reviewed the "Buildable Lands Inventory" that was conducted on behalf of the City of The Dalles in 2018 in which it was concluded that The Dalles has a surplus of buildable land available for new housing. The Dalles also has many abandoned business locations which can, and should be, redeveloped, for commercial use. For example: K Mart, Sears, Red's Trading Post, as well as open lots, such as the former Armory property, that are available as well. And there are numerous, core, downtown properties that would benefit from redevelopment and enhancement of the City of The Dalles. Industrially, we not only have a number of Port of The Dalles properties that are available for commercial and light industrial development, there are a number of properties that are part of the Airport complex in Dallesport which are available for development (shovel-ready, as they say), as well as other properties in the Dallesport incorporated area that are zoned and available for industrial development. We strongly encourage the Commission to stand strong and choose to not allow communities, such as The Dalles, and Dallesport, to expand their Urban Growth Boundaries beyond the constraints of your "minor revisions" definition. These communities have sufficient room to grow, to infill, to redevelop, and to industrialize. We don't want them to have what the Scenic Area Act was attempting to constrain, and that is the on-going ability to sprawl, and expand, outside of the areas for development, that they were generously awarded in the 1986 Act. Please continue to work together to find and encourage ways for communities to remain economically robust within existing boundaries. These times require us to be more conservative with our resources and mindful of how we take care of the present generation while we continue to work to develop and pass on environmentally, economically and equitable residential, commercial and industrial communities to the next generation/s. | See 1. |
| **14** | | **UAB** | 1. In regards to the Revision of Urban Area Boundaries, I agree with and **support the proposed definition of a minor revision**: page 416, #8: limits the revision to cumulatively 20 acres or 1% of the total Urban Area, whichever is less. This is the maximum I would support. I'm assuming that you are required to define what is a minor revision. Any encroachment into the National Scenic Area is not desirable. Where could this occur where it wouldn't be destroying habitat or resource land, or otherwise conflict with the purposes of the National Scenic Area Act (protecting and enhancing the scenic, cultural, recreational, and natural resources of the Gorge)? In Section (f) (2) of the National Scenic Area Act, two of the criteria for revision of urban area boundaries are demonstrable need and maximum efficiency of land uses within the urban area. Neither of these has been shown. In regards to need: In 2018 a buildable lands inventory for housing was done in the largest of the urban areas, The Dalles. It was determined that there was a surplus of buildable land beyond what was projected to be needed over the next 20 years. Of the 480 acres of buildable land only an estimated 232 acres would be needed in the next 20 years (less than half of the buildable land). Efficiency of land use hasn't happened in the urban areas. Higher density in the urban areas is needed, not sprawl into the National Scenic Area. I believe having the National Scenic Area really adds value to these urban areas (increased property values, tourism income, and better quality of life). We need to preserve and protect the natural areas in the gorge, not eliminate them. Once you expand the Urban Area Boundary you can't reverse it later. | See 1. |
| **15** | **415** | **UAB** | "Minor" means "minor." We went through this, I believe in 2007 or 2008 when a lot of people who had been involved with the map making for the NSA, from Sen. Hatfield's office, to the administrator for the City of Stevenson (Mary Ann Duncan-Cole), came to a public hearing at the Best Western in Hood River and it was apparent from all the input that "minor" means "minor" no matter how people want to twist this pretzel! Urban growth of population is NOT a valid justification for UAB revision. And, the concept that growth should happen in another urban area or rural center and not in the one requesting a UAB expansion has been brought forth for discussion and is a valid argument against UAB expansion in a stressed urban center. | See 1 and 16. |

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| **16** | **416** | **UAB** | Population growth is NOT a factor in UAB expansion. If it was, the NSA would be another Portland urban area in a few years!! The NSA has reached the limits of the carrying capacity for its resources. | The first 4f criteria in the NSA Act is a demonstrated need for population growth. Applications for urban area boundary revisions require that communities show that population growth is occurring in order to successfully apply for a revision. |
| **17** | **416** | **UAB** | Public lands SHALL NEVER be used to support residential and economic uses for the Urban Areas. | Nothing in the Act under the "Revision of urban area boundaries" section references how public lands are used. An exception is the limitation on revision of Special Management Area boundaries; where urban area boundaries and Special Management Area boundaries are concurrent, the Gorge Commission adopted policy 3 that requires such revisions to be considered under the separate process described in the Act. |
| **18** | **417** | **UAB** | After “adaptation” add a “,” and then a “,” after “gases” and the add “and the resilience of the scenic, cultural, recreation, and natural resources. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August and September meetings and did not address this policy statement. The Gorge Commission did adopt a new Climate Change chapter in the Draft Management Plan that addresses climate adaptation and resilience which may influence future application of urban area boundary revision policy. |
| **19** | **417** | **UAB** | Add “without impacting NSA resources” after “land uses.” | This comment references policy 13, which refers to the 4(f) criteria regarding the maximum efficiency of land uses within and on the fringe of urban areas. The criteria in the Act does not reference impacts to NSA resources. The Gorge Commission discussed proposed and amended UAB policies at its August and September meetings and did not make any changes to this policy. |
| **20** | | **UAB** | 1. Comments on Urban Growth Area expansion: The Gorge is caught is caught in a catch-22: The better the Gorge Bill works to preserve the Gorge from development, the better it will look compared to less protected places as a place to live, so the more pressure there will be for development. The Gorge Bill was a big compromise, and one of the compromises was to let all of Dallesport be urban growth area. That area should be sufficient for all new development. Period. There is no reason to expand any other area. Let new development happen where it is in fact happening - outside the boundaries of the CGNSA. There is plenty of room there. (High Prairie, Hood River Valley, Goldendale Area, the beautiful land south of The Dalles, etc.). The CGNSA is small. Any decrease in land will be significant. On the other hand if you add land to urban growth boundaries, it will do nothing to stop all the other development outside the boundaries. So why change the boundaries? Would you be changing the boundary to benefit a particular land owner? Bowing to pressure from a county? How would it benefit the Gorge to change a boundary? But if you do bow to pressure to change boundaries, the acreage of the Scenic Area that is preserved should not change. In Dallesport there are wetlands, dunes, and perhaps other features that deserve preserving. If you increase the area of one area you should decrease another, and do so by adding land with high natural value from an urban growth area to the GMA or SMA lands. Also any land added to the urban growth area should still have the color restrictions and height restrictions for structures in the SMA and GMA lands, to help make any new additions blend with the landscape and not detract from views. I just went by a newly built house painted a bright color, and if it were in a newly added urban area, it would make the urban area seem larger and the edge more conspicuous from quite a distance. I came to Oregon from Chicago in 1964. The town where I lived awhile as a child, Aurora, used to be separated from Chicago by miles of farms and cornfields. Now it is continuous urban sprawl. If you allow urban growth areas to expand even a little at a time but you keep letting it happen, in 50 or 60 years there will be no scenic area left, at least in the areas where development is possible. Let the expansion occur outside the CGNSA, as it is doing. | See 1. |

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| **21** | | **UAB** | I would encourage holding fast to the decision made by the majority of the Gorge Commission to hold Urban Boundaries in place for now and abide by the definition of “minor” boundary expansions agreed to in that meeting. There is always tension between development and non-development; between human habitation and open spaces for nature and humans. The National Scenic Area with key urban boundaries was put in place to hold open spaces for nature and for the nation to enjoy. The value of the open space is key to the scenic area and its draw to visitors. The value of smart development inside the current urban boundaries is key to providing amenities for visitors and great habitable urban spaces for smart businesses and families to work and live. Without those original decisions on urban boundaries, the length of the gorge would be full of trophy homes with views and condos stacked on all the ridgelines. The economic value of the gorge would be irreparably damaged and there would be no going back. A handful of people would be enriched to the determent of those who grew up in the urban and rural areas of the gorge and still live there. This is a key tendency of humans, to develop and replace nature; the Scenic Act attempts to help us save some open space. I would encourage we hold boundaries for now. | See 1. |
| **22** | | **UAB** | REGIONAL BUILDABLE LAND INVENTORY & ANALYSIS IN LIGHT OF CLIMATE CHANGE I encourage careful re-evaluation of any proposed urban boundary expansion pressure for the human impacts it has on water, land and natural resources as opposed to only concentrating on acres of urban land vs non urban land that was set up in 1986, or increasing a tax base in an urban area or a “need to grow” urban boundaries. I grew up in the gorge and understand fully the pressure to develop. I watched some mistakes occur as I grew up and the damage businesses like aluminum plants did longer term to orchards and the health and environment in exchange for a few years of jobs that relied on cheap hydroelectric power. Develop and build models that show if and when smart urban growth is occurring now and in the future. Make sure water resource utilization and availability is built into those models. Let the data guide further discussions of boundary expansions when the Buildable Land Inventory (BLI) and analysis metrics show discussions are needed. Provide regional resources to assist towns and counties do the work to build in water resource availability and use as a result of current and Future boundaries and climate change. Infrastructure to deliver services to a new development area is not good enough going forward. We need a regional water plan that speaks directly to the urban and agricultural pressures the gorge faces area by area, town by town. The needs will be slightly different from West to East because of the precipitation levels, water sources, geography-water holding capacity and modes of use in the various areas. Let’s be sure we have solid smart water and land use metrics in place for the gorge in light of changing precipitation levels going forward. If an urban area inside or outside the gorge in the dry West has good metrics in place, lets examine them for value and see how they might fit other areas. Work with all impacted counties to share and inform the public of the models and metrics in basic language all can appreciate. Work with the counties to inform the public of smart water and land use practices on an ongoing basis. Work with the counties to build understanding of the value of smart water and land utilization in light of human and environmental pressures. | The Gorge Commission's draft policy 10.B requires regional analysis for applications to revise the boundaries of an urban area. The draft policy does not reference any specific factors, such as those included in this comment. The Gorge Commission may establish factors to consider when conducting regional analysis as part of rulemaking in the future. |
| **23** | | **UAB** | On urban growth. I have spent 3 years in The Dalles trying to help locate property for a homeless mission and skill training center and low income housing. Currently there just is no place for one. I agree with Angie Brewer and the mayor of town that there needs to be more space. There is a lot of gorge land within existing development that should come into use. Its surrounded by uses from housing to business all around it. There is no possibility it has real value as open space. The Dalles has no more water to put on new acres in the area. So no open space land now will later have agriculture on it. Acres surrounded by development will never be grazing ground.<br>I agree that sprawl is not a good idea. Particularly here where we don't have adequate services for fire. My best idea is to come up with urban expansion plans that first use every acre right up against or in town with development around it now. Then allow and define increase over time. Certainly 20 acres is not enough. Last I would say to those who want to cast the gorge lands in concrete. The plan never said we would punish the people of the gorge, and we already have greatly. The plan allows and has updates which means its meant to adjust over time. I think in fairness we can all admit that there is a lot of scenic beauty in the gorge. But the plan has extended to areas that are just plain common and would never be missed. Good administration would take that land that is not scenic and use it for expansion for people. | See 2. |
| **24** | | **UAB** | The Columbia River Gorge National Scenic Area is just that, a national scenic area, not a local scenic area. It is a national treasure to be enjoyed by all, not slowly eroded away. I strongly **support** the limiting of urban sprawl with the **proposed definition of a minor** revision (up to 20 acres or 1% of the urban area cumulatively). Given the poor pattern of development that has happened in the urban areas, there is no reason to expand the urban growth area boundaries. It has been driven by greed, not need. No compelling reason to do so has been presented. A **regional analysis** of the development potential in the existing urban areas should be required. | See 1. |

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| **25** | **415** | **UAB** | On Policies 1, 2, 5: [T]his group of policies leaves some ambiguity and uncertainty related to the ability of jurisdictions to apply for review of an urban area boundary amendment. The language added at the end of policy 5, allowing the Gorge Commission to receive additional funds for their review, is helpful as it provides a vehicle for jurisdictions to contribute to the costs; however, we encourage you to simplify this section in order to avoid a potential avenue for litigation/challenge before the application is even considered. Our recommendation is that you accept applications based on a clear set of submission requirements, along with whatever fee is necessary to supplement the costs to the Gorge Commission. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission amended the language of Policy 5 at its August meetings to further clarify how the Gorge Commission will fund its review of applications to revise the boundaries of an urban area. The policy now reads: "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 Gorge Commission in its review that are not paid by the state. Whether provided by the state or county, the Gorge 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, state, or both."<br><br>The Gorge Commission may review submission requirements as part of a rulemaking process after the Draft Management Plan is adopted. |
| **26** | **415** | **UAB** | Policy 6: We greatly appreciate the reference to state policies related to urban growth boundaries (UGBs); however, the language as currently proposed is somewhat vague and may provide unnecessary opportunities for challenges. For example, it references “state-required periodic plan updates,” which currently in Oregon are being conducted on an “as-needed” basis, rather than mandatory, as determined by the growth needs of individual jurisdictions. We recommend you replace the proposed language with something similar to the following:<br>The Gorge Commission will only consider applications to revise Urban Area boundaries that are consistent with state land use laws and rules to meet a demonstrated need for additional land to provide for vital public facilities and the residential and economic growth of a jurisdiction.<br>The key is that it should be the demonstrated land need that is the trigger for a proposed amendment, whether or not it is associated with a mandated periodic plan update. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission amended the language of UAB policy 6 at its August meetings to state: "The Gorge Commission will only consider applications to revise urban area boundaries in coordination with a similar request being applied for with the respective state land use authority." |
| **27** | **415** | **UAB** | Policy 7: Again, we appreciate your willingness and interest to include DLCD in the development of the process and review standards. We will be happy to participate and assist in whatever time and manner you deem appropriate and believe it will greatly improve both the State of Oregon and Gorge Commission processes to have this level of coordination among the Gorge Commission, DLCD, the impacted cities, and other regional partners. We will gladly commit the staff resources necessary to work on this with you. | The Gorge Commission and staff will include state land use planning departments in the UAB revision rulemaking process. |
| **28** | **416** | **UAB** | Policy 8: We share the concerns expressed by Oregon cities and counties in regard to the “hard cap” on the cumulative expansion to an urban area boundary over time. Considering the method by which the federal act originally determined urban area boundaries, limiting Oregon cities to their existing urban growth boundaries at the time, this policy is disproportionately burdensome on gorge communities on the south side of the river. As you are aware, UGBs in Oregon are intended to provide land for a 20 year growth horizon. As such, cities should have the ability to amend their UGBs as needed.<br>An amendment to a UGB should be more challenging and have a higher bar than an amendment in most other areas of the state. Adequately protecting the Scenic Area demands close scrutiny. We strongly support this concept due to the importance of protecting the Scenic Area; however, limiting expansion of a UAB to the lesser of 20 acres or 1% is not likely to prove reasonable to provide for future growth for Oregon communities. We recommend that, instead of instituting a hard cap on future expansion, we work together, along with the cities impacted by these decisions, to develop rigorous standards through rule that ensure the most efficient use of land within existing UABs/UGBs that is practical and feasible prior to allowing opportunity for expansion. This may be an additional reason to give strong consideration to develop such standards with this management plan update rather than as a follow up step as indicated in Policy 7. | See 1 and 2. Regarding "disproportionate impact," the Gorge Commission discussed this at its August and September meetings, and did not make further changes to the policy. |
| **29** | **416** | **UAB** | Policy 10A: We appreciate the reference to and inclusion of the Oregon the simplified urban growth boundary amendment method (OAR 660-038). This will not only provide a good basis for review standards that will ensure efficient use of land, while ensuring an opportunity for communities to meet their growth needs, but will also serve as a tool to coordinate state and Gorge Commission review. As we have expressed through our participation in the advisory committee, we support the Gorge Commission’s interest in revising “specific Oregon factors and add[ing] specific National Scenic Area factors” in order to avoid replication and to address the unique needs and priorities within the Scenic Area. | The Gorge Commission may address these specific NSA factors in rulemaking. |

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| **30** | **416** | **UAB** | Policy 10D: As an alternative to referencing “racial and ethnic minorities,” we suggest ensuring that each strategy for urban area expansion emphasizes the needs of low, moderate income and historically marginalized community members, including people with disabilities as priority populations for consideration in housing need in terms of building type and supply. This will vary by community. In some cases, now or in the future, priority populations defined through this lens may include but may not be necessarily limited to a racial or ethnic minority. | Staff made this change as a housekeeping edit. Policy 10.D now reads: "When addressing demonstrated need for long-term population growth, the Gorge Commission shall consider the relative benefits and burdens of the proposed revision to low- and moderate-income communities, members of historically marginalized communities, and people with disabilities." |
| **31** | **417** | **UAB** | Policy 14: We support the concept that prioritization of UAB should “prioritize revisions in areas where there would be no reduction of land used, suitable, or designated for agriculture, forest, and open space. In fact, this is in perfect alignment with the mission of our department and this is an important policy. We do encourage you to make it clear that, in the absence of land that meets this standard, there is still an opportunity for expansion onto other lands. The second/last sentence of this proposed policy seems to indicate this by allowing the Commission to “establish a priority of lands to be considered for revising into Urban Areas.” However, this is a “may” statement, not a “shall.” We recommend that this policy be clarified to ensure there is a definite method for cities to propose an expansion based on a land priority if there is not an opportunity to expand onto land that does not affect agriculture. We would be happy to work with you on the land prioritization structure if you would find our participation helpful; a similar process/standard is already in place within Oregon’s UGB expansion rules. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August meetings and did not made clarifications to this policy. Further clarifications may be made as part of rulemaking. |
| **32** | **415** | **UAB** | Policy 5: This policy ties urban area revisions to adequate agency funding at the beginning of each biennial budget. The policy allows the Commission to determine whether one or more urban area boundary adjustment application will be considered during the biennium. The policy does not establish criteria on how the Commission will prioritize multiple applications if funds are not available to consider all applications. We recommend that the management plan include criteria or additional information to inform counties on how the Gorge Commission will prioritize multiple applications. | See 25. |
| **33** | **415** | **UAB** | Policy 6: This policy ties urban area boundary revisions to state-required periodic plan updates. This reflects the recommendation in our administrative rule to defer site-specific urban growth area adjustments to the next periodic update. Urban growth area amendments require significant resources, and typically include updates to the land use element, the transportation element, capital facilities element and other portions of the comprehensive plan.<br>The policy also allows applications at other times expressly specified in state law. Although our WAC recommends deferring applications to a periodic update, the GMA allows comprehensive plan updates and urban growth area amendments annually. Periodic reviews are required every eight years, however, Skamania and Klickitat counties are “partially planning” under the GMA and do not review urban growth areas as part of their periodic update process. Partially planning counties are only required to review and update resource lands policies and critical areas regulations during the required GMA periodic update. We recommend you continuing working with local stakeholders and clarify language to determine whether you actually want to limit applications to the periodic update, or allow them more frequently based on local changes. | See 26. |
| **34** | **415** | **UAB** | Policy 7: We support continued collaboration and appreciate the opportunity to coordinate with the Gorge Commission to establish appropriate urban area revision processes and identifying relevant state standards. | See 27. |
| **35** | **416** | **UAB** | Policies 10-13: These policies establish the general criteria that counties must show to establish the need to revise urban area. The GMA requires urban growth areas to be served with adequate and available urban facilities and services. We encourage the Commission to add policy language to ensure future urban revisions are subject to the same requirement; that counties and/or cities must show urban areas are served with public water, sewer and concurrent transportation systems. You might also consider additional language recognizing that boundaries are based on twenty-year growth projections. | See 22 and 29. |
| **36** | | **UAB** | The Amendments also abrogate provisions of the Act protecting mineral and transportation interests and urban area economic development. On those issues, we support comments submitted by Jordan Ramis PC and Davis, Wright, Tremaine LLP, addressing essential economic activities within the Scenic Area. | See 2. |
| **37** | **416** | **UAB** | I’m very concerned that the proposed Urban Area Boundary Revision policies are too restrictive, especially for Oregon communities that have tighter urban growth boundaries and need more flexibility to balance preservation and growth pressures. Please allow for more time to engage with Oregon stakeholders. If you do move forward, please remove Policies 8B and 10B. Policy 8B too narrowly defines ‘minor’ revision. It would arbitrarily cap land available for housing and prevent Oregon cities from meeting their state-required land supply for housing needs over the next 20 years. It could also have negative unintended consequences, causing cities to expand onto valuable farmland instead. This is a huge concern. Policy 10B is inequitable for Oregon because it links Oregon land supply to Washington land supply without taking into account the latter’s larger urban growth boundaries and assumes their growth needs are linked when they are not. Please define additional ‘minor’ criteria in Policy 8B, including geographical context of previous zoning, land for certain housing types, affordability, and densities, like my companies build to meet the needs of Oregonians. Overall, please ensure any policies contain as clear and objective criteria as possible so that Oregon communities can have increased clarity on future potential urban area boundary revisions. I already see that housing affordability and choice is becoming more and more elusive in both Wasco and Hood River Counties. Without a clear path for counties to submit revision applications, our cities will continue to feel the pressure for land to accommodate our community members’ housing needs. | See 1. |

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| **38** | **414** | **UAB** | **Urban Areas - Page 414:** The National Scenic Area Act only allows minor revisions to the existing urban area boundaries in the 13 towns within the Columbia River Gorge. There currently is a large surplus of lands set aside for future urban growth. We strongly support new policies to limit urban sprawl by requiring a regional analysis of the development potential in all existing urban areas and defining "minor revision" to be up to 20 acres or 1% of the land area of the urban area, whichever is less. This policy must be cumulative over time. | See 1. |
| **39** | **414** | **UAB** | Title: The National Scenic Area Act (Act) allows for "minor revisions to the boundaries of any urban area", but the term "minor" is missing from the chapter title. "Minor" should be added to the title of this section. | The term "minor" is not in the title of the section in the Act. No change made. |
| **40** | **414** | **UAB** | Introduction to the section: The Act requires the Gorge Commission to protect and enhance scenic, natural cultural and recreation resources; agricultural land, forest land and open space. It also requires the protection and support for the economy of the National Scenic Area by encouraging growth to occur in existing urban areas. This introductory text should be corrected to accurately describe the Commission's role in the Act. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission amended the language of the introduction to this section at its August meeting. |
| **41** | **415** | **UAB** | Policy 3: The proposed policy is problematic in two ways. First, the Gorge Commission does not "only approve" applications. According to sec. 4(f)(1) of the Act, the Commission "may make minor revisions" to urban area boundaries, subject to compliance with the criteria. Second, sec. 4(f)(1) requires consultation with the Secretary of Agriculture on all applications for minor revisions to urban area boundaries (not just revisions involving Special Management Area boundaries). | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August meetings, and did not address changes to policy 3. The Gorge Commission can address this comment as part of rulemaking, if necessary. |
| **42** | **415** | **UAB** | Policy 4: The timing for informing the Commission of intent to seek a boundary revision should be more specific and should take place prior to the submission of the requested budget to the governors. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August meetings, and did not address changes to policy 4. The Gorge Commission can address this comment as part of rulemaking. |
| **43** | **416** | **UAB** | Policy 8: The proposed new policy 8.A.i. should be clarified to include no net increase in total area of the urban area. Proposed revisions that involve the reduction in total area would likely be considered minor. The proposed new policy 8.A.ii. should be clarified to apply to revisions up to 20 acres or 1% of the total area. The word "if" at the beginning of the sentence is a typo and should be deleted. Friends supports policy 8.B. Without this policy the National Scenic Area is threatened by incremental urban sprawl. | See 1. The Gorge Commission amended the policy at its August meetings, and did not address the term "no net change." |
| **44** | **416** | **UAB** | Policy 9, Friends is concerned that it would be inconsistent with the Act to transfer nonconforming urban uses out of urban areas into the GMA. Replace the term "should" with "shall." Add consistency with the Management Plan. | Staff made the change. Policy 9 now reads: "Land formerly in an urban area that is transferred into the General Management Area shall not contain development or urban facilities that is inconsistent with the purposes and standards in sections 3 and 6 of the Act." |
| **45** | **416** | **UAB** | Policy 10B: Friends general supports Policy 10 A. through E. However, policy 10.B. needs to require an analysis of land supply and need for all thirteen urban areas, not just urban areas around the bridges. There is a large surplus of urban area lands within the National Scenic Area and a boundary should not be revised for one urban area while thousands of acres of vacant or underutilized lands exist in urban areas throughout the National Scenic Area. Requiring analysis of land supply and need for all urban areas is most consistent with the purposes and standards of the Act, and consistent with section 4(f)(2)(A). | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission amended the language of UAB policy 10B at its August meetings and did not require regional analysis to include all 13 urban areas. |
| **46** | **417** | **UAB** | Policy 11: Require enforceable conditions of approval to ensure that lands taken out of the GMA and into urban areas are used only to satisfy the need that was the basis for the revision. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission amended the language of UAB policy 11 at its August meetings. The policy now reads: "In deciding whether or not to approve an adjustment to the urban area boundary, the Gorge Commission shall consider whether (a) the implementing measures by the local government that will govern the expanded urban area; and (b) the Gorge 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 Gorge Commission shall deny the application as failing to meet the requirements of Section 544.b.(f)(2)." |
| **47** | | **UAB** | The changes … are so significant that we request you slow the process down to allow for more consultation. Adopting the proposed Urban Area revision language would have significant ramifications on the communities, people and business that call the National Scenic Area home, and we feel that taking more time for policy development on Urban Area revisions is essential to the future success of this region. | See 2. |

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| **48** | **416** | **UAB** | [It] is important to allow each individual urban area to function on its own and meet its own needs for vacant land to provide for the uses of its current and future populations. Our communities are skilled at using infill, reuse, and redevelopment policies to make more efficient and creative use of the land within Urban Areas now, but larger areas of vacant land will be needed as a tool for long-term growth. | See 2. |
| **49** | | **UAB** | However, we are gravely concerned that the Growth Management Plan's proposed revision policies are too restrictive. The policies reflect an anti-growth attitude that would prevent National Scenic Area ("NSA") communities on both sides of the Columbia River from expanding their urban areas to accommodate needed housing. The restrictive policy implications are particularly germane to Oregon's urban areas, where state-regulated urban growth boundaries mean there is less available land for housing. Oregon communities need more flexibility to achieve a reasonable balance of preservation and growth. | See 2. |
| **50** | **416** | **UAB** | However, if the Commission does move forward, we request you consider the following revisions. Remove Policies 8B and 10B. These two Policies set arbitrary, inequitable, and unrealistic criteria which disregard Oregon's land use planning laws. Policy 8B would limit the expansion of urban areas to the lesser of 20 acres or 1%, cumulatively, over time, capping available land at an arbitrary threshold and ultimately prohibiting Oregon NSA cities from meeting their state-required 20-year land supplies for needed housing. As an unintended consequence, these cities could then expand onto valuable farmland outside of the NSA in order to meet state land use requirements. Policy 10B would require Oregon NSA counties to account for land supply in Washington urban areas that adjoin or are 'near' to NSA Columbia River bridges. This is inequitable for Oregon's urban areas because they include less land available for housing than their counterparts in Washington. Oregon's needs are not intrinsically linked to growth in Washington, which is subject to different land use planning laws and projected development rates. Yet by artificially linking land supply across the two states, this policy could inadvertently cripple Oregon's response to its needed housing. | See 1. |
| **51** | **416** | **UAB** | Revise Policy 8 to define other clear and objective minor revision criteria. Policy 8 is problematic because it does not differentiate between different types of land within urban areas. While HBA supports ensuring communities are able to make objective minor revisions to their urban areas, the Commission should include other minor criteria that reflect its land priorities while considering unique characteristics and needs of the community. Such additional criteria should consider the geographical context of previous zoning, land for certain housing types, affordability, and densities, along with land for open space and alternative transportation infrastructure. | See 1. The Gorge Commission may generally consider other criteria as part of the rulemaking process. |
| **52** | **415** | **UAB** | Policies 1, 4, and 5 would effectively allow the Commission to unreasonably deny any revision application. These policies tie boundary revisions to subjective budget decisions which could result in inaction given historic budget constraints. The Commission should replace the subjective language in these policies with clear and objective notice and application timelines. Furthermore, given that Oregon's periodic land use planning updates occur on an as-needed basis, the Commission should amend Policy 6 to allow counties to submit applications to the state on their own timeline, eliminating an arbitrary regulatory burden. | See 25 and 26. |
| **53** | **415** | **UAB** | Policies 7, 12, 13, and 14 defer key policy decisions to rulemaking, bypassing the critical need for state stakeholder engagement. The Commission should amend Policy 7 to reflect how it will coordinate with Oregon housing and land use planning agencies. It should also amend policies 12, 13, and 14 to further outline how revision applications can comply with the Columbia River Gorge National Scenic Area Act section 4(f) compliance criteria. Doing so now is crucial for communities to have revision process clarity. | See 2. |
| **54** | **414** | **UAB** | **Urban Areas**, Page 414<br>The National Scenic Area Act only allows minor revisions to the existing urban area boundaries in the 13 towns within the Columbia River Gorge. There currently is a large surplus of lands set aside for future urban growth. I strongly support new policies to limit urban sprawl by requiring a regional analysis of the development potential in all existing urban areas and defining "minor revision" to be up to 20 acres or 1% of the land area of the urban area, whichever is less. This policy must be cumulative over time. | See 1 |
| **55** | | **UAB** | Resolution opposing proposed revisions to the Columbia River Gorge Management Plan policies for UAB revisions | See 2. |
| **56** | | **UAB** | Resolution opposing proposed revisions to the Columbia River Gorge Management Plan policies for UAB revisions | See 2. |
| **57** | | **UAB** | Resolution opposing proposed revisions to the Columbia River Gorge Management Plan policies for UAB revisions | See 2. |
| **58** | | **UAB** | Request CRGC delay decision-making on the proposed revisions to the urban area boundary polices, based on inconsistency with Oregon Planning Goal 14 re: Urbanization. The CRGC has failed to properly consider stakeholder input and conduct agency coordination to ensure that adopted policies are on balance with Oregon's statewide planning goals. | See 2. |
| **59** | | **UAB** | Resolution opposing proposed revisions to the Columbia River Gorge Management Plan policies for UAB revisions | See 2. |
| **60** | | **UAB** | The opportunity for Urban Areas to expand and allow our community to grow and develop in an appropriate manner needs to be included in this management plan update. I hope that you will move the urban area boundary revision discussion to a later date and continue to work on revised language that supports the local economies of the Gorge. | See 2. |
| **61** | | **UAB** | Resolution opposing proposed revisions to the Columbia River Gorge Management Plan policies for UAB revisions | See 2. |

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| **62** | | **UAB** | Under proposed policies, amount of land added to all UAs is 170ac, ridiculously low numbers compared to other growth in other areas. Growth in NSA limited (and allowed) by 4f criteria, not Commission's interpretation of word "minor." Further, Commission must make policy choices now, not defer them to later. | See 2. |
| **63** | | **UAB** | See comment for full details. Includes potential conflicts with Oregon Statewide Land Use Planning Goals including: Goal 1: Citizen involvement; Goal 2 (Land Use Planning); Goal 3 (Agricultural Lands); Goal 4 (Forest Lands); Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces); Goal 9 (Economic Development); Goal 14 (Urbanization). States that the comment is not an exhaustive list of all potential conflicts. | See 2. |
| **64** | | **UAB** | We are also in agreement with the recommendations from<br>OneGorge and appreciate the Gorge Commission being receptive and willing to collaborate on these issues.<br>The Port Commission recommends that the suggestion for creation of the Urban Growth Boundary process be included in the adopted Land Use and adopted Economic Development sections of the Management Plan. This issue of the UGB affects both land use and economic development over the next 30-50 years. This new process should be developed before the adoption of the revised Management Plan.<br>Finally, let us commend the Gorge Commission for opening these two processes to broad community involvement. We are hopeful that the Gorge Commission will use similar processes in all future policy development. | See 2. |
| **65** | **415** | **UAB** | Policies 4 and 5 (re: funding) make arbitrary standard that likely results in inaction. Also removes any "reasonable obligation" by the GC to review requests. | See 25. |
| **66** | **415** | **UAB** | Policy 8a, 20ac or 1% was a safe harbor, now it isn't. need ability to make argument for revisions that could otherwise be acceptable, gives history about area outside Hood River UA that was apparently an "urban reserve" when UA was created. | See 1. |
| **67** | **415** | **UAB** | If keeping limit in policy 8, revise 8a to allow acreage transfer between communities - allows growth without increasing UA acreage | See 1. The Gorge Commission did not consider this at its August or September meetings. |
| **68** | **416** | **UAB** | 8b is redundant and should be removed | See 1. |
| **69** | **416** | **UAB** | Strong opposition to 10B, regional analysis, creates inequity with WA communities that didn't have UGBs in place in 1986, prevents needed growth in OR | See 1 and 28. |
| **70** | **417** | **UAB** | 10E, climate change considerations, inclusion of this language will all but ensure that urban area boundaries are not allowed to expand since, by its nature, development within urban areas will inevitably have greater potential adverse impacts on climate change and the generation of greenhouse gases than maintaining it as rural land. | See 2. The Gorge Commission may consider how to specifically address climate change considerations as part of rulemaking. |
| **71** | **417** | **UAB** | 11 and 13, enforceable conditions of approval, would cause annexed areas to be subject to NSA rules even though they are in UA and not subject to NSA rules | See 46. |
| **72** | **417** | **UAB** | Policy 14, commission should change to "minimize the reduction" rather than "no reduction" unless commission maps out areas adjacent to UAs where lands appropriate for expansion exist | See 31. |
| **73** | **419** | **UAB** | Changes to "public involvement" section of gorge commission role chapter are not aligned with how the commission developed its UAB policies | See 2 and responses to comments in Public Comment Process section. |
| **74** | | **UAB** | Resolution opposing proposed revisions to the Columbia River Gorge Management Plan policies for UAB revisions | See 2. |
| **75** | | **UAB** | The lack of clarity and considerable discretion provided to the Gorge Commission related to hearing a request for a boundary amendment creates a costly and challenging process for small, rural communities to consider beginning with no certainty around how, or if, their applications will be considered. With the limited resources available to both those communities with urban area boundaries and Gorge Commission, this approach does not provide a realistic path for boundary amendment. | See 2, and tab on public comment process. |
| **76** | **416** | **UAB** | 20 acres over time is not enough land to support true economic development for communities in the Columbia River Gorge. This size parcel could barely be used for one smaller scale development, let alone a larger opportunity for strategic growth. | See 1 |
| **77** | **416** | **UAB** | Requiring consideration of communities in two states, some incorporated and some not, with two different policy frameworks, and very different access to resources for investment in infrastructure and site readiness for either residential or employment lands when looking at meeting demand for development is not realistic. Additionally, a mix of uses and opportunity for development within an individual community impacts their ability to provide services like infrastructure, education, parks, public safety, and community economic development. These funding streams are specific to communities and the boundaries should be looked at through the ability of an individual community to make smart decisions about how to develop. | See 1 |
| **78** | | **UAB** | While there were many public meetings on this topic, there was little time for consideration and discussion of the draft policy once it was put forth. The EDC encourages slowing down on this chapter and working with stakeholders to come to consensus on a path forward. | See 2, and tab on public comment process. |
| **79** | | **UAB** | 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. | See 2. |

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| **80** | **415** | **UAB** | 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. | See 25. |
| **81** | **416** | **UAB** | [T]he definition of "minor" is simply an application that satisfies the §4(f)(2) approval criteria. There is no need to overcomplicate a reasonable reading of the Act. That said, if the Commission is going to stick with a percentage for defining minor, a more reasonable number would be 10 percent. While the City still objects to using a percentage of acres to define minor, 10 percent with no cumulative cap would be workable for the City. It would also be more fair. | See 1. |
| **82** | **416** | **UAB** | 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. | See 2. |
| **83** | **415** | **UAB** | 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. | See 26, 27. |
| **84** | **416** | **UAB** | Supports definition of "minor revision." | See 1. |
| **85** | **416** | **UAB** | Recommend that applicants seeking UAB expansion be required to respond to a clear set of performance criteria or mitigation actions prior to approval or in tandem with development in the expanded area, including climate mitigation, density requirements and protections for streams, wetlands, and landscape coverage in new UA acreage. | The Gorge Commission may adopt specific factors or criteria that address the measures listed in this comment as part of rulemaking, in relation to the requirements for demonstrating need or conducting the regional analysis. See 22. |
| **86** | **415** | **UAB** | Policies 7, 8, 10, 12, 13 are decided on a case-by-case basis. Lack of clear standards will hinder applicant's abilities to prepare successful applications. | See 1. The Gorge Commission did not consider amendments to policies 7, 12, or 13 at it's August or September meetings. Further clarifications may be made as part of rulemaking. |
| **87** | **415** | **UAB** | Policy 4 should have a more specific timeframe, for example, 6mo ahead of budget submittal or by a certain date each year. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August meetings and did not address policy 4. Further clarifications may be made as part of rulemaking. |
| **88** | **415** | **UAB** | Policy 6 may not be relevant to WA non-planning counties because the Growth Management Act doesn't require them to do "periodic review." | See 26. |
| **89** | **416** | **UAB** | Policy 8 both vague and overly prescriptive. Minor changes should not be limited to a predetermined arbitrary number. | See 1. |
| **90** | **416** | **UAB** | Policy 10 refers to Oregon law, which WA residents have no say over. If we want that we should adopt the whole language rather than incorporating by reference. | See 1. |
| **91** | **416** | **UAB** | Serious concerns about Policy 10.B which requires an urban area to consider the buildable lands of another, particularly if the analysis requires considerations of land in a different state. | See 1. |
| **92** | | **UAB** | Request to delay decision on UAB and get policies right before adopting anything. No-growth policies are inconsistent with the Act. | See 2. |
| **93** | | **UAB** | Resolution opposing proposed revisions to the Columbia River Gorge Management Plan policies for UAB revisions. | See 2. |
| **94** | | **UAB** | With respect to Urban Area Boundaries, we formally support the suggested revisions and comments provided by Elaine Albrich on behalf of the Port of The Dalles on June 30, 2020. | See 2. |

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| **95** | **414** | **UAB** | The Port proposes [introduction] language based on current policy language contained in the Management Plan and consistent with the expressed vision. | The Gorge Commission amended the introduction at it's August meeting. It now reads: "Congress designated 13 cities and 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. Urban areas are exempt from regulation under the Management Plan. The National Scenic Area Act authorizes the Gorge Commission to make minor revisions to the boundaries of any urban area, subject to the criteria and procedural requirements in section 4(f) of the Act. In doing so, the Act enables the Gorge Commission to protect and enhance for the scenic, natural, cultural, and recreation resources; agricultural land, forest land, and open space of the Columbia River Gorge, while supporting and serving the needs of the thirteen urban areas. The following policies describe principles for how the Gorge Commission interprets and will apply the criteria in section 4(f) of the Act." |
| **96** | **415** | **UAB** | The Port proposes to delete proposed policy 1 and replace with the following to (a) address the concern that the Commission is attempting to use procedural hurdles to block applications and (b) correct any potential due process issues. | Staff provided the Commission with all comments on this topic as well as a summary of the comments. The Commission adopted policy 1 in May and did not address it at its August or September meetings. The policy reflects an existing Commission rule that allows the Gorge Commission discretion in hearing applications for boundary revisions. |
| **97** | **415** | **UAB** | The Port proposes to include language referencing Appendix C (containing the urban area legal boundaries) and noting that the rule may be amended from time to time (e.g., upon approval of an urban area boundary revision the rule would need to be amended to reflect the amended boundary). | The Gorge Commission did not discuss this proposal at it's August or September meetings. This may be clarified as part of rulemaking. |
| **98** | **415** | **UAB** | The language [in Policy 3] should track the authorization in 544 (c) of the Act governing revisions to SMA boundaries. | The intent of this policy statement is to make clear that revisions to urban area boundaries that are concurrent with Special Management Area boundaries follow a different process. No change necessary to meet that intent. |
| **99** | **415** | **UAB** | The Port proposes consolidating the language in proposed policies 4 and 5 as follows to (a) address the concern that the Commission is attempting to use procedural hurdles block applications, and (b) correct any potential due process issues. | See 25. Changes to policy 5 potentially address issues with policy 4. The Gorge Commission may clarify these policies as part of rulemaking. |
| **100** | **415** | **UAB** | The Port requests that the Commission delete [Policy 6] and allow an applicant to decide the timeline for filing an application with the Commission. Depending on agency consultation and other considerations, an applicant may seek to file an application with the Commission prior to filing with the state, concurrent, or subsequent to obtaining state approval. | See 26. |
| **101** | **415** | **UAB** | The Port requests that the Commission address this coordination issue [in Policy 7] before adopting any amendments to the urban area boundary policies. As proposed, proposed policy 7 improperly defers a policy choice that the Commission must make for how to coordinate with state law. DLCD has offered to participate in such discussions and the Commission should defer acting on the urban area boundary policy changes until such consultation has occurred. | See 27. |

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| **102** | **416** | **UAB** | The Commission's proposed definition of "minor" is arbitrary and inconsistent with the Act. 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. The 20 acres amounts to a 0.36 percent increase for The Dalles (5,436 acres), a 0.6 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)(2) approval criteria.<br><br>The Act states that the Commission "may make minor revisions to the boundaries of any urban area." The Act then goes on to provide that the "Commission may revise the boundaries of an urban area only if [it meets the (A)-(D) approval criteria]." Read together, the plain language of the Act specifies that the type of revision the Commission may make under 4(f)(1) is one that meets the four criteria in 4(f)(2). The Act does not say that the Commission cannot accept an application that is not minor, only that it may not approve a revision that is not minor. For example, a county may file an application for 150 acres, but the Commission may find that only 75 acres meets the §4(f)(2) criteria and therefore, only a 75-acre revision is allowed under §4(f)(1).<br><br>Alternatively, the Port proposes a definition of "minor" that looks to strike a compromise between using a numeric threshold and a discretionary standard. | See 1. |
| **103** | **416** | **UAB** | The Port and other stakeholders have serious concerns about the Commission's ability to require one urban area to consider the buildable lands of another, particularly if the analysis requires consideration of land in a different state. While the Port agrees with the Commission's direction in Proposed Policy 10, recognizing that the demonstration of need in §544b(f)(2)(A) is founded in Oregon's growth policies, the proposed language is not policy-focused. Instead, the draft is more appropriate for rulemaking. Therefore, the Port proposes something simpler and policy-focused. | See 1. |
| **104** | **417** | **UAB** | As drafted, proposed policy 12, 13, 14 simply defers policy choices to a later rulemaking or application review process. [For policy 14,] The Act itself, in §544d(f)(2)(D), recognizes that there may be some reduction in agricultural, forest, and open spaces but such reduction cannot be "significant." The Commissions current language directly conflicts with the plain language of the Act. | Regarding policy 14, see 31. Clarifications to policies 12 and 13 may be made as part of rulemaking. |
| **105** | **416** | **UAB** | 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. | See 1. |
| **106** | **416** | **UAB** | 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 | See 1. |
| **107** | **415** | **UAB** | 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. | See 26 and 27. |
| **108** | | **UAB** | 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 unfished, unworkable in practice, and fails to balance the purposes of the Act. | See 2. |
| **109** | | **UAB** | Use Urban Area Boundary "minor" definition endorsed for inclusion in the Draft Management Plan at the May 26th Commission meeting. | See 1 |
| **110** | | **UAB** | Recommend in-depth regional analysis of the current Urban Areas in the gorge and determine resources and needs. Development plans for all Urban Areas should look at water modeling in the gorge. | See 22. |
| **111** | | **UAB** | Ensure no changes to Urban Area Boundaries are made because economic benefits of local urban areas are dependent on protection of the scenic, ecological area. | See 2. |
| **112** | | **UAB** | Limit urban sprawl by requiring a regional analysis of the development potential in all existing Urban Areas. | See 1. |
| **113** | | **UAB** | Support defining "minor" revision to be up to 20 acres or 1% of the land area of the Urban Area, whichever is less. | See 1 |
| **114** | | **UAB** | Support no expansion of Urban Areas because previous inventory in Urban Areas shows that smart growth can occur; need to first focus on density in Urban Areas. | See 2 |
| **115** | | **UAB** | City of Hood River updated housing needs analysis estimated that Hood River Urban Area can accommodate estimated population growth for about the next 17 years. Planning department is working to add density in appropriate ways. | See 2 |
| **116** | | **UAB** | Support definition of "minor" for Urban Area Boundary revision as 20-acres or 1% of land within each Urban Area, whichever is less. | See 1 |
| **117** | | **UAB** | Oppose the proposed definition of "minor" for Urban Area Boundary revision as 20-acres; this caps the City's ability to expand. Sorosis Park in The Dalles is 40-acres; under this proposal, the City would only be able to expand by one-half the size of this park. If the Commission is looking for a hard number, the City proposes a range of 7-10% of the City's total acreage. | See 1 |

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| **118** | | **UAB** | Need to grow and expand the tax base to be able to provide economic benefits for The Dalles. Any economic development in Dallesport does not contribute to property tax revenue in support of the County, schools, park system, or any other local government on the OR side of the Columbia River. | See 2 |
| **119** | | **UAB** | Request a compromise on Urban Area Boundary language, which is not 20-acres or 1%, for all time. A compromise offers a pathway acceptable to the Gorge Commission and stakeholders. | See 1 |
| **120** | | **UAB** | Concerned about proposed definition of "minor" for UAB expansion. Under this proposal, 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 in total forever. 170 acres is a 0.6% increase in the total Urban Area acreage; this is about 0.06% of land in the National Scenic Area. The 20-acre definition amounts to about a 0.36% increase for The Dalles, a 0.6% increase for White Salmon, Bingen, and Stevenson, and a 0.83% increase for Hood River. These numbers are too low, are absolute limits on growth, and do not ensure that an application is "minor," but rather that it is de minimis. | See 1 |
| **121** | | **UAB** | Mentioned several examples of expansion in Oregon as context: Nyssa (town of about 990 acres) added 281 acres in 2019; Bend (20,000 acres) added 2,380 acres in 2016; and City of Springfield (about 10,000 acres) added 781 acres in 2016. Acknowledged that these examples are not in a National Scenic Area and do not have to comply with 4(f) criteria. | See 1 |
| **122** | | **UAB** | Commission's definition of "minor" is arbitrary and inconsistent with the intent of the Act. | See 1 |
| **123** | | **UAB** | Support a net zero loss of land when considering Urban Area Boundaries. Do not want to lose any National Scenic Area land to Urban Areas. Recognize that there are trade-offs between resource protection and growth. | See 2 |
| **124** | | **UAB** | Extremely concerned with proposed Urban Area Boundary language; this is effectively a no-growth policy. The Port has previously submitted comments and suggestions and will be providing additional written comments by June 30th. | See 2 |
| **125** | | **UAB** | The Port of the Dalles unanimously passed Resolution 20-004 opposing proposed Urban Area Boundary revisions on June 10, 2020. | See 2 |
| **126** | | **UAB** | Support proposed definition of "minor" revision for Urban Area Boundaries. In 2018, a buildable lands inventory for The Dalles determined that only 232 acres would be needed of the 480 acres available. Higher density development in Urban Areas is needed, rather than expanding boundaries. | See 1 |
| **127** | | **UAB** | Given differences in OR and WA land use planning and the COVID-19 pandemic, Association urges the Commission to defer any Urban Area Boundary policy amendments in order to further engage with Oregon land use and housing agencies and the public. | See 2 |
| **128** | | **UAB** | National Scenic Area Counties need more flexibility to balance preservation and growth. Policies 8b and 10b set arbitrary, inequitable, and unrealistic criteria with disregard for OR land use planning laws. To allow Hood River and Wasco Counties to respond to their housing needs over time, Association requests deletion of proposed policies 8b (definition of "minor") and 10b (requiring Counties to consider lands on both sides of the Columbia River). | See 1 |
| **129** | | **UAB** | Regarding policies 1, 4, and 5, encourage Commission to develop clearer and more objective County notice and application timelines. | See 23 |
| **130** | | **UAB** | Concerned about Urban Area Boundary expansion and connection with climate change and environmental protection. Previous studies indicate that there is adequate land for development; should focus on high density development, rather than expansion. Time and resources spent on Urban Area Boundary revisions have distracted from other Commission priorities; support moving on to other topics. | See 2 |
| **131** | | **UAB** | There is currently a surplus of vacant or underutilized land within the 20,500 acres of land set aside for urban development in the gorge. This is nearly double the acreage of all state park lands in the National Scenic Area. Dallesport has 6,500 acres that is mostly vacant. | Staff provided the Gorge Commission with all comments on this topic as well as a summary of the comments. The Gorge Commission discussed proposed and amended UAB policies at its August and September meetings. |
| **132** | | **UAB** | Support broadening regional analysis of buildable lands and opportunities for growth in all 13 Urban Areas before any Urban Area Boundary is revised. Support tying the proposed definition of "minor" to an analysis of need for all Urban Areas. | See 45. |
| **133** | | **UAB** | Oppose increasing Urban Area Boundaries; support the Draft Management Plan's position on urban development. | See 2. |
| **134** | | **UAB** | If buildable lands inventories show there is land available for development, these areas should be used first. Can amend the Management Plan to allow for expansion later if future inventories support it. | See 2. |
| **135** | | **UAB** | Please do not expand urban growth boundaries to appease the whining of those who would love to see the gorge become ravaged by urban sprawl. There are effective ways of handling growth, such as evaluating and strengthening protections from STRs, density rule changes, and allowing more housing on existing open land inside the urban growth boundary, which often requires large parcels even on land that is not being used for agriculture. Allow ADUs in the city of Hood River and other cities in the gorge stressed by growth needs. . | See 2. |
| **136** | | **UAB** | Prevent urban sprawl by requiring regional analysis of development potential and ensuring that any urban boundary revisions are truly minor in scale. | See 1. |
| **137** | | **UAB** | The Amendments also disregard provisions of the Act which protect and promote forest practices and urban area economic development. On those issues, we support comments submitted by Davis, Wright, Tremaine LLP and Stoel Rives LLP, addressing essential economic activities within the NSA. | See 2. |
| **138** | | **UAB** | Prevent urban sprawl by strengthening protections that control expansion of urban area boundaries into the management areas of the National Scenic Area. The second purpose of the Scenic Area Act is to promote economic development that is consistent with protection of the scenic, cultural, recreation, and natural resources of the gorge. This is accomplished by increasing urban density rather than urban sprawl. | See 2. |

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| **139** | | **UAB** | We hope that you will have added to the management plan: clear measures to prevent urban sprawl. | See 2. |

| | Page | Topic | Comment | Response |
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| 1 | 13 | Introduction | Line "urban areas may expand over time" should be retained. | New phrasing is more specific to the actual requirements for UAB revisions. No change made. |
| 2 | 10 | Introduction | Removal of quote from Sen. Hatfield is removal of only quote that references that "people live in the gorge." | The Gorge Commission retained this comment at its August meetings. The final Draft Management Plan will show this as new text, exactly matching the deleted text. |
| 3 | 11 | Introduction | Describe UAs at 10% of NSA acreage, keep inclusion of Congress in language. | Added percentage, new text reads: "Together they comprise approximately 10 percent of the National Scenic Area." Did not re-insert line about Congress because reference to Act is more specific. |
| 4 | 13 | Introduction | Change description of SMAs to little "physical" development, due to substantial recreation use that has same impacts as development. | Would need to evaluate assertion in order to make change, which is beyond scope of streamlining revisions. No change made. |
| 5 | 13 | Introduction | Add line about requirements under 4f criteria. | Rest of introduction does not specifically cite a part of the Act. No change necessary. |
| 6 | 14 | Introduction | Include "human existence" as well as "human enterprise." | Human existence is implied in human enterprise, and as stated in the comment, other places in the introduction reference the human presence in the NSA. |
| 7 | 14 | Introduction | Remove language about requirements to bring pre-act development into compliance. | These requirements exist and are not new/proposed (for example, square footage limitation on accessory buildings applies even if all accessory buildings are pre-Act). Reference to them here does not imply that all pre-Act development must immediately come into compliance with the Draft Management Plan upon its adoption. |
| 8 | 10 | Introduction | Keep Hatfield quote. | See 2. |
| 9 | 11 | Introduction | Remove redlines that define area as a "single" region. | "A region" and "a single region" have the same meaning. |
| 10 | 11 | Introduction | Should retain statement that Congress defined UAs, not imply that Commission did. Retain original language. | Paragraph above states that the Act defines Urban Areas (UAs), and therefore Congress defined them. Removal of line about Congress reduces redundancy. |
| 11 | 12 | Introduction | Act does not require that UAs are primary focus of economic growth. | Removed the word "requires" and changed to "envisions" which appears to more closely match meaning of paragraph. Text now reads: "The Act envisions that the urban areas are the primary focus for future growth and economic development." |
| 12 | 12 | Introduction | Congress vision should be forefront, not Commission vision. | Section refers specifically to the vision statement provided that was developed by the Gorge Commission. It is accurate to say "Commission's vision" as the implementing body, and leave the statement regarding Congress's "direction" through the Act. |
| 13 | 13 | Introduction | Insertion of SMA into paragraph, removal of "commercial, residential, industrial" and reference to "the Commission's repeated attempts to remove language supporting the economic purpose of the Act." | Removal of this language does not remove the second purpose of the Act. The Gorge Commission does not have jurisdiction on what is allowed in Urban Areas so removal of language provides more clarity. |

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| **14** | **13** | **Introduction** | Implication that development is not welcome outside UAs. | Activities are not prohibited. Last sentence of this section is that the "delicate balance" referenced earlier tips in the direction of the resources outside of Urban Areas, which is how the Management Plan is applied. |
| **15** | | **Introduction** | 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. | See 1 and 2. |
| **16** | **86** | **Cultural** | Update reference to include newer tech used to communicate with tribes. | Remove word "tape" and replace with word "audio." |
| **17** | **86** | **Cultural** | Use LiDAR to conduct surveys. | Survey methods are determined by the survey professionals. The Gorge Commission can't mandate use of a particular technology without knowing whether it can be used for this purpose. |
| **18** | **91** | **Cultural** | Tribal governments should have 30 calendar days to provide written reports. | Cultural Advisory Committee is not established, and a tribal government's assertion that a resource is significant is enough rationale to start review. No change needed. |
| **19** | **97** | **Cultural** | Comments on establishment of CAC | Comment did not propose a language change or policy position. |
| **20** | **97** | **Cultural** | Make GMA and SMA cultural review standards the same. | This suggestion is a policy-level change, rather than a clarification, and would require that the Cultural Resource chapters be included as focus topics for the Gorge 2020 process. |
| **21** | **2** | **Cultural** | What percentage of the CRGNSA has been surveyed? | The original Management Plan Identified that 10% of the CRGNSA has been surveyed for cultural resources. This has not been tracked since and is likely outdated. Most applications for uses and development are reviewed for potential impacts to cultural resources, and staff deleted language regarding percentage survey. Paragraph begins with: "The provisions in the Management Plan require reconnaissance surveys for most new uses and development ..." |
| **22** | **3** | **Cultural** | Consider providing a little detail about how the level of effect on cultural resources in determined, including that this is done by qualified archaeological staff. | This is discussed with further details in the GMA Provisions section as well as the GMA Guidelines. |
| **23** | **5** | **Cultural** | Are actions planned for the creation of the CAC in the near future? Who will be on the committee? | The Cultural Advisory Committee language should be retained in case the Gorge Commission and the four Columbia River treaty tribes would like to establish the CAC in the future. |
| **24** | **9** | **Cultural** | What does "filed with the Gorge Commission" mean? That Tribes notify the Gorge of concerns via letter? Tribes may not share sensitive information with the Gorge Commission. | This seemed as though the "file with the Gorge Commission" was referencing the criteria developed to determine cultural significance. In practice, tribes may assert that resources have cultural significance without meeting any specific criteria. Removed the line about filing with the Gorge Commission. |

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| **25** | **10** | **Cultural** | Some information regarding "the nature and extent of any cultural resources" cannot be shared outside of cultural resource staff. | The Management Plan does not require the level of detail required that would risk resource protection. The party reporting the cultural resource can provide only the limited amount of detail to protect the cultural resources without disclosing sensitive information. Made this a "may" statement so this intent is clearer, now reads: "The tribal government may choose to include comments that describe the nature and extent of any cultural resources ..." |
| **26** | **18** | **Cultural** | Is this statement in regards to sales of lands that contain cultural resources? This statement is confusing. | Clarified that this is for non-federal lands. Text now reads: "The proposed use is limited to the transfer, lease, or sale of non-federal lands that contain cultural resources, and adequate restrictions or conditions are included to ensure preservation of the significant features of the resources." |
| **27** | **435** | **Cultural** | The tribes are the best judge of whether an area is used or could be used for treaty reserved rights. | Generalized references throughout the Draft Management Plan to areas subject to review for treaty rights. Broadened GMA Policy 1 in this chapter to "Local governments shall notify the governments of the four Columbia River treaty tribes when new review uses are proposed on lands within the National Scenic Area" and carried that through to guidelines. |
| **28** | **436** | **Cultural** | Consider removing the applicant. Consultation is on a government to government basis. Applicants are not governments. Applicants can provide information, but it's not formal consultation. | Removed references to "applicants" in the guidelines. |
| **29** | **438** | **Cultural** | Has [a treaty rights protection plan] ever been done in this forum? | This "plan" is not defined. The general outcome when treaty resources are involved and effects might occur is that either the project adapts to avoid resources, or does not go forward. |
| **30** | **470** | **Cultural** | "For purposes of the actions managed under the management plan, CTWS believes the proposed definition [of cultural resources] is sufficient, but encourages the Commission to recognize the broader range of cultural resources [including historical documents, religious beliefs and practices, and living people]." | No edit necessary to Draft Management Plan to respond to this comment. |
| **31** | | **Cultural** | Definition of "traditional cultural property": “Monumental sites, sacred places, legendary areas, mythical locations[, traditional gathering areas,] and landscape[s and landscape] features that are identified by the specific communities that hold meaning for them. They maintain and perpetuate values and practices of the group that attach significance to them. They provide spiritual cohesion to the community.” | Edit made to glossary as shown in the comment. |
| **32** | | **Cultural** | Make sure savings provision in Act is adequately referenced elsewhere in Plan. Nothing in Act shall "affect or modify any treaty or other rights of any Indian tribe." | Made edits throughout Draft Management Plan where treaty rights are referenced. |
| **33** | | **Cultural** | "In other words, the consultation obligation is not limited to specific locations that are currently being used or identified for tribal fishing but can encompass any area within Zone 6 or activities that can impact fish habitat within the zone." | Broadened guidelines where there is narrow reference to treaty rights. Reference to "other rights" makes all guidelines appropriately broad. |

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| **34** | **435** | **Cultural** | Remove "new" from guidelines referencing when tribes are consulted or when counties need to consider potential impacts. This should include all things requiring an application. | Changed to state "new review uses" so it's clear that anything reviewed under the Management Plan's standards require consideration for consultation and cultural resource and treaty rights impacts. See 27. |
| **35** | **436** | **Cultural** | Recommended revisions to GMA guidelines 5 and 8, regarding evaluation of effects to treaty rights and confidentiality of tribal resource information. | Applied proposed changes (regarding tribal government notice and comment period requirements) to GMA Guidelines 5 and 8, combined with CTUIR comments as well. |
| **36** | | **Cultural** | See last two pages of letter for comments on encouraging "cultural tourism." Connects to Recreation. | Took some language from this section of the comment letter and included it in the Interpretation/Education Chapter. |
| **37** | **77** | **Cultural** | In Introduction, expand Key Issues to address more "indirect effects" of development and other resources (rec specifically). | Added "and impacts from recreation uses." |
| **38** | **481** | **Cultural** | Define "project area" to include consideration of direct and indirect impacts to cultural resources. This aligns plan language with concept of Area of Potential Impact in National Historic Preservation Act. | The National Historic Preservation Act is broader than the purposes of the NSA Act. The Management Plan currently provides adequate protection measures for cultural resources. |
| **39** | | **Cultural** | Reference Tribal Historic Preservation Office where dealing with consultation with tribal government. | No change made because staff determined that reference to "tribal governments" covers more than just THPO, and that other tribal departments are often included in the reference. |
| **40** | | **Cultural** | Use term "pre-contact" rather than pre-historic. | Changes made in these chapters, added to style guide for full plan review. |
| **41** | **81** | **Cultural** | Question whether some uses that are excluded from reconnaissance review should be due to implied ground disturbance. Same for uses that occur on sites already disturbed since they could affect character of a place. | Increased notice requirements will allow tribal consultation where resources exist or where treaty or other rights are involved. Changes to reconnaissance survey standards would require more substantial review of the chapter. |
| **42** | **82** | **Cultural** | Ensure low probability areas not just based on past surveys, should include other variables | "Low probability areas" are based on old survey data, and modern reviews also examine more recent surveys and other available information. If tribes assert that a resource may be impacted, then they can prompt a reconnaissance survey, and increased notice requirements should provide opportunity for tribes to review. |
| **43** | **85** | **Cultural** | Email should be mandatory for notice to tribes, where available. | Change made. Text now reads: "At a minimum, notice shall be sent via email where addresses are available. If a tribal government requests notice in another form, local governments shall comply with that request." |

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| **44** | **86** | **Cultural** | It should be made clear in the consultation and ethnographic research section that oral history identification through tribal sources is part of the consultation and that sensitive tribal information may be redacted by the appropriate tribal representative in any written comments and consultation minutes. | Ties to comments regarding confidentiality and added language to this effect. Two text changes: "This consultation meeting may include oral history identification through tribal sources." and "All written comments and consultation meeting minutes shall be incorporated into the reconnaissance or historic survey report, except that sensitive tribal information may be redacted by an appropriate tribal representative." |
| **45** | **86** | **Cultural** | All reconnaissance surveys must be done by qualified professional | Added guideline to "Reconnaissance Surveys - Small-Scale Uses" section: "Reconnaissance surveys for small-scale uses shall be designed by a qualified professional." This matches language for other reconnaissance survey guidelines. |
| **46** | **87** | **Cultural** | For large scale uses, an APE, consistent with NHPA guidelines, should be utilized for a complete consideration of potential Project effects. | See 38. |
| **47** | **89<br>95** | **Cultural** | Always require IDP in conditions of approval. | This is already a guideline. Made guideline clearer that it must be included as condition of approval. Text in both sections reads: "… and shall be included as conditions of approval for all review uses." |
| **48** | **91** | **Cultural** | Local governments should submit evaluations of significance to the SHPO and THPO/tribal governments for concurrence. | Added "for concurrence" to Guideline 1 under "notice of evaluation results." |
| **49** | **91** | **Cultural** | Identify alternate process to adjudicate disagreements in evaluations of significance, because CAC does not exist. | Beyond the scope of clarifying review. No change made. |
| **50** | **94** | **Cultural** | Avoidance/mitigation strategy could be requiring use of a monitor during construction. | Tribes may request use of a monitor as a condition of approval. Added line to mitigation section about use of a monitor as a potential option: "Alternative measures may include, but are not limited to, requiring a monitor during construction…" |
| **51** | **96** | **Cultural** | In regards to notification of the discovery of human remains, “DO NOT CONTACT MEDIA” needs to be included in the notice. | Change made. Text reads: "Do not contact any other entity other than those listed here." |
| **52** | **99** | **Cultural** | Literature review and consultation must include an assessment not only of National Register listed resources, but also resources that are Eligible or Unevaluated for National Register inclusion. | Beyond the scope of clarifying review. No change made. |
| **53** | **81** | **Cultural** | Question whether some uses that are excluded from reconnaissance review should be due to implied ground disturbance. | Beyond the scope of clarifying review. No change made. If a tribal government believes ground disturbance will affect cultural resources, it may request consultation. |
| **54** | | **Cultural** | Until a thorough survey of cultural resources is completed in the Gorge, require cultural resource reconnaissance surveys prior to any approval of land divisions, significant ground-disturbing activities, and new development. | Surveys required for significant ground disturbing and new development, those guidelines are explained in detail in the chapter. Land divisions don't require adding surveys for land divisions, and this is beyond the scope of clarifying review. |

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| **55** | | | Amend the definition of "cumulative effect" to require analysis of past, present and reasonably foreseeable actions. | Current definition appears to incorporate these factors. No change made. |
| **56** | **397** | | Part III: Chapter 4: Enhancement Strategies, Scenic Resources, GMA/SMA Objective 3: The GC should not only encourage, it should demand that that these agencies, in this case OR's DEQ and WA's SWCAA, monitor air and visibility quality in the NSA. | Staff modified the language to clarify that the Gorge Commission's objective is to coordinate with OR and WA agencies on air quality and visibility monitoring. One example is the Oregon Department of Environmental Quality's Regional Haze program that includes the National Scenic Area. The new text is: "Coordinate with federal and state agencies on air quality and visibility monitoring in the National Scenic Area..." |
| **57** | **398** | | Part III: Chapter 4: Enhancement Strategies, Scenic Resources, GMA/SMA Objective 4.D: Add "to protect resources" after the comma. | Staff made this change. The new text is: "Encourage use of conservation easements to mitigate project impacts, protect resources, and recognize property values." |
| **58** | **402** | | Part III: Chapter 4: Enhancement Strategies, GMA/SMA Objectives 1.C(6): Add "value-added wood products." | Staff made this change. The new text is: "Assist with marketing and research efforts to enhance the economic viability of secondary manufacturing for wood products, increased utilization of wood products, value-added wood products, and other miscellaneous forest products." |
| **59** | **402** | | Objective 1 under Forest Land Enhancement Strategies (Page 402) is proposed to be amended as follows: "Enhance the ability of forest land to ensure continued productivity <u>and to provide scenic, natural, cultural, recreation</u>, and economic benefits over time." This additional language [in underline] should not be added as it could subject forest management practices, especially in the GMA, to additional scenic, natural, cultural, and recreational regulations beyond those currently applicable." | The intent of the additional language is to convey that forest land enhancement strategies may provide a range of benefits, including economic. Removing this portion of the objective is unnecessary, since the Management Plan allows forest practices as a use allowed outright, except in Open Space and Ag Special Land Use Designations. State Forest Practices Acts regulate forest practices, and this change does not have a regulatory effect on forest practices where they are allowed. |

| | Page | Topic | Comment | Response |
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| 1 | | Climate | Climate Change<br>The inclusion of a climate change chapter in the plan will begin the process of better understanding the effects of climate change on Gorge resources and community and will help the Commission and the Forest Service in adapting management to respond to the effects of climate change and build climate resiliency. | See responses to Climate Change comments from the first comment period. |
| 2 | | Climate | Adopt a Climate Action Plan<br>Climate change is here and well underway. If left unchecked, it will have disastrous consequences for all life on earth. We urge the Commission to at a minimum adopt a goal of compiling their Climate Change Action Plan within one year of the adoption of the revised Management Plan. The Gorge Commission should continue to include the prohibition of any loss or destruction of wetlands, include buffers for all waterways and waterbodies, and be flexible enough to address other issues as they arise, which they certainly will. | See responses to Climate Change comments 5, 12, and 88 from the first comment period. |
| 3 | | Climate | Protect Agricultural Land, Forest Land<br>Climate change is increasing the frequency and severity of forest fires. Policies limiting new residential development on forest lands are critical for human safety and environmental protection. FWSR also supports new updates to the farm dwelling standards that will ensure protection of farm land for farm uses and prevent conversions to residential development. Residential development needs to be concentrated in urban growth areas. | See responses to Climate Change comments 89 and 90 from the first comment period. |
| 4 | | Climate | Climate Change: Thank you for taking the first step toward addressing climate change by creating a Climate Change chapter in the Management Plan and proposing the future development of a Climate Action Plan. However, climate adaptation and mitigation policies are necessary as soon as possible to fulfill the purposes of the National Scenic Area Act and protect fish, wildlife, sensitive plants, and human health in the Gorge. Please set a target goal for completion of the Climate Action Plan within one year of the adoption of the revised Management Plan. Please continue to include and examine the prohibition of any loss or destruction of wetlands, buffers for all waterways and waterbodies, and Firewise policies as a part of the Climate Action Plan as you move forward. | See responses to Climate Change comments 5, 12, and 88, and Land Uses comment 14 from the first comment period. |
| 5 | | Climate | Climate Change: Please keep this as an URGENT priority. | See responses to Climate Change comments from first comment period. |
| 6 | | Climate | I urge the commission to adopt a Climate Action Plan within one year of adoption of the revised Management Plan. Amidst all the challenges that 2020 has brought us, Climate Change remains the most urgent to address, as it will have growing economic and health impacts on all of us with each passing year. | See response to Climate Change comment 5 from the first comment period. |
| 7 | | Climate | Adopt the New Climate Change Chapter and Require a Climate Action Plan<br>OCN applauds the Commission in beginning to address climate change by including a climate change chapter in the Management Plan and by requiring the future development of a climate action plan. Climate adaptation and mitigation are needed as soon as possible to fulfill the purposes of the National<br>Scenic Area Act and protect fish, wildlife, sensitive plants, and human health in the Gorge. OCN supports a goal of adopting a Climate Change Action Plan within one year after the final adoption of the revised Management Plan. | See response to Climate Change comment 5 from the first comment period. |
| 8 | | Climate | Adopt a Climate Action Plan The Gorge Commission has taken the first step toward addressing climate change by creating a climate change chapter in the Management Plan and proposing the future development of a climate action plan. However, climate adaptation and mitigation policies are necessary as soon as possible to fulfill the purposes of the National Scenic Area Act and protect fish, wildlife, sensitive plants, and human health in the Gorge. The climate crisis is growing worse on a yearly basis, and we are far past the time for minor measures. Drastic action must be taken across all sectors of our society, and that includes every agency and commission you have any influence on. We would like to see the Gorge Commission adopt a goal of compiling their Climate Change Action Plan within one year of the adoption of the revised Management Plan. The Gorge Commission should continue to include and examine the prohibition of any loss or destruction of wetlands, buffers for all waterways and waterbodies, and Firewise policies as a part of the Climate Action Plan as they move forward, as well as any other issues related to climate change as they arise. | See responses to Climate Change comments 5, 12, and 88, and Land Uses comment 14 from the first comment period. |

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| **9** | | **Equity** | Friends generally supports the proposed equity language and policies drafted by staff and commissioners. The only glaring omission is the lack of acknowledgement of Oregon's exclusion laws, including its 1857 constitution. These laws barred black citizens from residing in Oregon, voting, owning property, or entering into contracts. The exclusion clauses in the constitution were not repealed until the 1926 and 1927, yet their legacy continues today.<br>Many Oregonians are not aware of this history of structural racism in Oregon. We can all learn from the words of Maya Angelou who said, "Do the best you can until you know better. Then when you know better, do better."<br>Friends' proposed language to add to the introductory statement [in bold]:<br>**The Commission acknowledges and regrets Oregon's history of structural racism including its exclusionary laws and its 1857 constitution, barring black citizens from residing in Oregon, voting, owning property, or entering into contracts.**<br>Suggested language for GMA Policies: The Gorge Commission recognizes that including diversity, equity and inclusion in its decision-making is essential to implementing the National Scenic Area Act. GMA Policies:<br>1. The Gorge Commission shall develop and adopt Diversity, Equity and Inclusion (DEI) plan by July, 2021. The plan shall be reviewed and updated as necessary on a regular basis.<br>2. The plan shall include specific measures and outcomes to:<br>a. Ensure a more diverse staff and commission<br>b. Develop and apply an equity lens to its policy decisions<br>c. Engage under represented communities in the Columbia Gorge region<br>d. Support local governments in existing urban areas in planning for affordable housing<br>e. Support and uphold treaty rights and the rights of indigenous persons | At its September 2020 meeting, the Gorge Commission approved a Diversity, Equity, and Inclusion statement with this language: "The Commission acknowledges and regrets Oregon's history of structural racism including its exclusionary laws and its 1857 Constitution barring Black citizens from residing in Oregon, voting, owning property, or entering into contracts." |
| **10** | | **Equity** | Support Equity Policies<br>FWSR believes that diversity, equity, and inclusion (DEI) are completely interconnected to responsible environmental stewardship and leadership. We support the development and adoption of a DEI plan within a year of adoption of the revised Management Plan, with the understanding that steps to increase diversity, do not need to wait for the development of a plan. We understand that this is easier to say than to do, but we absolutely believe that groups currently underrepresented will bring valuable insights and intelligence to on-going policy making. | See response to Equity comment 1 from the first comment period. |
| **11** | | **Equity** | Support Equity Policies: Most importantly, I support the inclusion of diversity, equity, and inclusion (DEI) policies in the revised Management Plan. The policies should require development of a DEI plan including the following outcomes: ensure a more diverse staff and commission, apply an equity lens to decision making, more actively engage under-represented communities in the region, support affordable housing for urban areas, uphold treaty rights for indigenous tribes and promote policies that support the rights of indigenous peoples, and any other relevant and appropriate goals that are identified as the DEI process evolves. | See response to Equity comment 1 from the first comment period. |
| **12** | | **Equity** | Equity: Please prioritize indigenous rights, tribal lands, and local culture. | At its September 2020 meeting, the Gorge Commission approved a Diversity, Equity, and Inclusion (DEI) statement. See responses to Equity comments 1, 2, and 3 from the first comment period. |
| **13** | | **Equity** | Include Equity Policies in the Revised Plan<br>OCN believes that diversity, equity, and inclusion (DEI) are connected to responsible environmental stewardship. We support the Commission in adopting DEI policies that require the development of a DEI plan soon after the adoption of the revised Management Plan. The DEI plan should ensure a more diverse staff and commission, apply an equity lens to the Commission's policy decisions, more actively engage under-represented communities in the region, support affordable housing for urban and rural areas, uphold treaty rights for Indigenous tribes and promote policies that support the rights of Indigenous peoples. | See 12 above. |
| **14** | | **Equity** | I know it's too late but I wanted to throw my support behind the diversity and inclusion efforts. I know commissioners are deciding on Tuesday but I didn't want my voice to get left out. | See 12 above. |
| **15** | | **Equity** | Support Equity Policies ACE believes that diversity, equity, and inclusion (DEI) are completely interconnected to responsible environmental stewardship and leadership, thus the decision-making processes of the Columbia River Gorge Commission should recognize the importance of including DEI whenever they implement the National Scenic Area Act. We support the development and adoption of a DEI plan within a year of adoption of the revised Management Plan, with the understanding that such a plan shall be reviewed and updated on an annual basis. The goals for outcomes from such a plan should: ensure a more diverse staff and commission, apply an equity lens to decision making, more actively engage under-represented communities in the region, support affordable housing for urban areas, uphold treaty rights for indigenous tribes and promote policies that support the goals of indigenous peoples, and any other relevant and appropriate goals that are identified as the DEI process evolves. | See 12 above. |

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| **16** | | **Equity** | Equity, Diversity and Inclusion: The Commission should add policies to the Management Plan to address historic inequities, engage under-represented communities, support indigenous people and treaty rights and support planning for affordable housing within existing urban areas in the Gorge. | See 12 above. |
| **17** | | **Equity** | I commend your efforts to develop a diversity, equity and inclusion plan. At this point in time, I do not have any suggested language revisions. I look forward to hearing more about this important work. | See 12 above. |
| **18** | | **Land Use** | I just heard, via the Corbett Facebook page, that you are planning to ban short term rentals such as Airbnb in the scenic area. I am just outside of the scenic area, in Springdale. But I am incensed that you would make such a change:<br>1. We have land use planning that prevents density.<br>2. A short term rental that is vacant sometimes will end up with way fewer folks in the gorge than a full time resident.<br>3. As far as I know, there have been no public meetings on this question. You are not gods who get to decide these things without input. What is your process for notifying folks who are impacted? That would include both homeowners and nearby counties.<br>4. In this time of Covid, more folks are vacationing closer to home. In taking the gorge out of the mix, you are depriving many folks of the opportunity to enjoy the gorge. It's not meant to be a museum.<br>5. I was in favor of the scenic act when it was created. I am not now, based on the arbitrary way that decisions are made and that the rules seem Orwellian in purpose. Is this rule a solution looking for a problem? What problems have you seen to warrant this intrusiveness? I would warrant that there were none or very few. Find something more important to do with your time.<br>6. How else can folks provide input to you and influence this decision? Or do you not<br>care about public input? | Gorge Commission staff has been conducting public outreach about Gorge 2020 through emails, press releases, community outreach meetings, radio talk shows, public notices, etc. since October 2016. Changes to the Management Plan that were proposed as part of the four focus topics, two technical revision topics, and the Climate Change chapter were open for public comment and discussion at Gorge Commission meetings over the last four years. If any landowner is adversely affected by new restrictions in the Draft Management Plan, the Gorge Commission can review those on a case-by-case basis at the time a permit application may be submitted.<br><br>The Management Plan has never allowed short term rentals in the NSA. Based on public input received during the several public open houses and Commission meetings where this topic was discussed, staff proposed adding a provision to the Draft Management Plan allowing short term rentals (called "Overnight Accommodations" in the Plan) under certain guidelines. The Gorge Commission approved this addition and the guidelines proposed in the Draft Management Plan provided for public comment in June 2020. |
| **19** | | **Land Use** | Agricultural Lands<br>Outdated criteria for new agricultural dwellings has been updated to ensure that agricultural land is protected from conversion to residential uses. The $80,000 gross annual income production test is a needed adjustment for inflation compared to the existing $40,000 income capability test. In fact, when adjusted for inflation, $40,000 in 1991, the year when the original Management Plan was adopted, is almost exactly $80,000 in 2019 dollars. However, the Guideline 1.H.(3)d. on Page 210 does not match the motion that was passed unanimously on August 12. The new draft guideline incorrectly retained the “income capability” language, where the adopted motion changed this to “…at least 80,000 in gross annual income in 2020 dollars.” This is a substantive difference that needs to be corrected. The capability test has been very problematic, because it has been interpreted to mean that the farm might be capable of producing $40,000 in gross actual income at some time in the future, as compared to the new language in the motion that requires current production. The correct language is included in the corresponding SMA guideline 1.C.(3)(d) on page 224 of the draft revised plan. The motion states:<br>Large-Scale and Small-Scale Agriculture, Review Uses, 1.H.(3)(d): Income capability. The farm or ranch, and all its constituent parcels, must produce at least $80,000 in gross annual income in 2020 dollars. This gross annual income amount shall be indexed for inflation on an annual basis using Consumer Price Index data from the US Bureau of Labor Statistics, and the new adjusted amount for each calendar year (calculated from 2020 dollars) will be posted on the Gorge Commission website by January 15 of each year. This determination can be made using the following formula: (CRGC Staff & USFS will investigate CPI for Commission) (Emphasis added) Friends recommendation: Edit 1.H.(3)(d) on page 210 to accurately represent the language in the motion that passed. "Income capability. The farm or ranch, and all its constituent parcels, must ~~be capable of~~ producin~~g~~ at least $~~40,000~~80,000 in gross annual income in 2020 dollars. This gross annual income amount shall be indexed for inflation on an annual basis using Consumer Price Index data from the US Bureau of Labor Statistics, and the new adjusted amount for each calendar year (calculated from 2020 dollars) and posted on the Gorge Commission website by January 15 each year. This determination can be made using the following formula:" | See responses to Land Uses comment 59 from the first comment period. |
| **20** | | **Land Use** | Forest Land<br>Protection of productive forest land is improved by removing policies and guidelines allowing new dwellings in Commercial Forest land and Large Woodland zones. With the increased frequency and severity of forest fires due to climate change, it’s essential to protect forest lands, reduce the risks of human-caused fires, and protect public safety and property by discouraging new residential development in forest zones. New dwellings will continue to be allowed in Small Woodland zones. | See response to Climate Change comment 90 from the first comment period. |

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| **21** | | **Land Use** | Oppose Accessory Dwelling Units outside Urban Areas<br>Friends ask that the Commission oppose efforts to increase the density of development outside of designated urban areas by allowing Accessory Dwelling Units (ADUs). Please do not encourage more residential development on rural lands, especially when there is a large surplus of land already set aside for urban development. | A motion was made to add an allowance of ADUs to the Draft Management Plan at the Gorge Commission meeting on 8/11/20. The motion failed. No amendments were made to the Draft Management Plan. |
| **22** | | **Land Use** | Keep Rural lands Rural<br>FWSR asked that the Commission oppose efforts to increase the density of development outside of designated urban areas. Accessory Dwelling Units (ADUs), while sensible and appropriate for increasing density within urban areas, should not be allowed on any lands in the Scenic Area that are outside the urban area boundaries. The Commission should always prioritize the protection of scenic, natural, cultural and recreation resources on lands outside of the urban areas as required by the National Scenic Area Act. Do not promote more residential development on rural lands. | See response to comment 21 above. |
| **23** | | **Land Use** | Protect Forest, Agricultural, and Rural Lands: I support preventing the conversion of forest lands to residential or agricultural uses and protecting agricultural land from development or commercial use. Climate change is increasing the frequency and severity of forest fires. I support new policies to further limit new residential development on forest land to help preserve forest lands, reduce fire risks, and protect public safety and property in the event of a forest fire. I support policies updating farm dwelling requirements to ensure that farm land is protected from conversion to nonagricultural uses. Also, Accessory Dwelling Units (ADUs), while sensible and appropriate for increasing density within urban areas, should not be allowed on any lands in the Scenic Area that are outside the urban area boundaries. The purposes of the National Scenic Area Act require growth to be directed into existing urban areas, not on rural lands. The Commission should always prioritize the protection of scenic, natural, cultural, and recreation resources on lands outside the urban areas, not promote residential development on rural lands. | See responses to Land Uses comment 61 from the first comment period. Also, see responses to Climate Change comments 89 and 90 from the first comment period for forest land protections.<br><br>A motion was made to add an allowance of ADUs to the Draft Management Plan at the Gorge Commission meeting on 8/11/20. The motion failed. No amendments were made to the Draft Management Plan. |
| **24** | | **Land Use** | I ask you to enforce established proscriptions against violators of the scenic act by closing down the Zimmerly Quarry now that the whole northwest knows of their repeated flouting of the laws over the course of years. | This is not within the scope of Plan Review. |
| **25** | | **Land Use** | I ask you to protect the homes, businesses, and natural resources of the gorge by stopping new home building in timber lands, which dilute the fire response resources available to contain wildfires. | See response to Land Uses comment 61 and Climate Change comment 90 from the first comment period. |
| **26** | | **Land Use** | Please protect The Gorge from further development. Protect the wildlife and our ability to recreate in it. Leave it wild. By not allowing further development, we may have a chance to manage it better, especially when it comes to wildfires. We also should get input from local Indigenous tribes in the area on how to best manage it. We should do this out of respect and because these people managed it for generations successfully because they cared about the wildlife and balanced the needs of all life in the area with their own needs. | See responses to Land Uses, Urban Area Boundaries, Natural Resources, and Equity comments from the first comment period. |
| **27** | | **Land Use** | I'm writing about the housing situation in the National Scenic Area. These are dire times for affordable housing for the residents of the NSA. First, we need a common definition of affordable housing. And, it's not one defined by builders and developers. This is a social issue. Second, we need to have a discussion about what makes a sustainable community that is filled with residents who invest and are invested in the community in which they live, play, and die. Third, a harder discussion needs to take place about vacation homes and vacation rentals in our communities that take housing stock off the market for permanent residents. Skamania county's Planning Commission will be taking on the issue of short term vacation rentals at their September 22nd meeting. I spoke to a Skamania county commissioner and he told me that the county is also discussing hiring a professional group to audit the number of vacation rentals that exist in Skamania county. Of course, there are different types of rentals, long term and short term. One guesstimate is that there are some 250 known vacation rentals just in Skamania; the belief is that there are many more. No matter what type of rental, there are tax implications: rental income, state and local occupancy taxes, and Washington State B&O taxes. Communities should benefit from these taxes since it is the community's common resources that are being used. I urge the Gorge Commission to also participate in finding out how many vacation rentals exist in the NSA counties so we can get a clearer picture of the state of housing stock in the NSA. And, we need to know how many second homes are being built in the Gorge. Second homes in the NSA are a real issue. Apparently, we have urbanites building large homes in Gorge communities and using them as weekend housing. These are not cottages. These folks are not voting or permanent members of the communities in which they recreate. They are not vested, in any meaningful way, in the community since their primary residence is somewhere else. They might pay some taxes locally, but they don't make that crucial investment of themselves. They use the resources but I don't believe they pay the entire bill for the infrastructures that they are using. It is the counties' citizens who bear that cost. Urbanites appear to have more money than many residents of the Gorge and are pushing up the price of existing homes out of the reach of local residents who actually keep these communities working and viable. Population and carrying capacity matter and the Vital Indicators Project should be part of the discussion about housing in the Gorge. I urge the Gorge Commission to participate in Skamania county's proposed audit to figure out how many vacation and short term rentals are in the county, and in the entire NSA. Or hire a firm yourselves. It would probably be cheaper to hire a firm together and share the cost. | The Management Plan has never allowed short term rentals in the NSA. Based on public input received during the several public open houses and Gorge Commission meetings where this topic was discussed, staff proposed adding a provision to the Draft Management Plan allowing short term rentals (called "Overnight Accommodations" in the Draft Management Plan) under certain guidelines. The intent is to bring existing short term rentals into compliance and to regulate future ones. The Gorge Commission approved this addition and the guidelines proposed in the Draft Management Plan provided for public comment in June 2020. |

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| **28** | | **Land Use** | I understand that at the last meeting, a motion adding cideries, breweries, distilleries, and other agricultural products to the provision for wineries was not approved. The Commission asked staff to provide alternate language that could allow some additional agricultural products to be processed on agricultural land in the National Scenic Area. While I appreciate cideries being added, I will reiterate my comments submitted for the Management Plan changes overall. As noted and supported elsewhere in the Management Plan, agricultural uses are the foundation of the economy of the Gorge. Opportunities to add value to agricultural products is essential for maintaining family farms and diverse food production throughout the NSA. Current amendments proposed would reduce the ability for family businesses who have been working on this land for generations to think creatively about how to sustain their operations. These suggested changes are not in line with the values stated elsewhere in the Management Plan for supporting agriculture. Allowing wineries but striking out, or not including, farm produce stands goes against the goal of supporting agriculture. While wine and wine sales are important, there are several similar products that would have similar impacts on the NSA and all should be treated the same. The language for allowed value-added agricultural uses should be stated in generic terms and not be specific to any single product or occupation. I encourage consideration of the language allowing "produce or product sales or tasting facilities in conjunction with a lawful production facility" rather than specifying only wineries and cideries. | See responses to Economic Vitality comments 1 and 2 from the first comment period. |
| **29** | | **Land Use** | Protection of Forest Land and Agricultural Land<br>OCN supports the Commission's draft policies limiting new residential development on forest lands. Climate change is increasing the frequency and severity of forest fires. Additional limits on new residential development on productive forest lands will help preserve forest land, reduce fire risks, and protect public safety and property in the event of a forest fire. OCN also supports the proposed updates to the standards for new farm dwellings requiring a minimum of $80,000 in gross annual production on the farm or ranch to be eligible. We also support the new policy indexing this figure to inflation. These policy updates will ensure protection of farm land for farm uses and prevent conversions to residential development. | See response to Land Uses comments 59 and 61 from the first comment period. |
| **30** | | **Land Use** | Keep Rural lands Rural<br>OCN asked that the Commission oppose efforts to increase the density of development outside of designated urban areas by allowing Accessory Dwelling Units (ADUs) in rural areas. The Commission should encourage ADUs in the existing urban areas and always prioritize the protection of scenic, natural, cultural and recreation resources on lands outside of the urban areas as required by the National Scenic Area Act. Please do not encourage more residential development on rural lands, especially when there is a large surplus of land already set aside for urban development. | See response to comment 21 above. |
| **31** | | **Land Use** | Protect Agricultural Land, Forest Land Climate change is increasing the frequency and severity of forest fires. ACE supports new policies limiting new residential development on forest lands. This will help preserve forest lands, reduce fire risks, and protect public safety and property in the event of a forest fire. ACE supports new updates to the farm dwelling standards that will ensure protection of farm land for farm uses and prevent conversions to residential development. | See response to Land Uses comment 61 from the first comment period. |
| **32** | | **Land Use** | Land Protection: We support preventing the conversion of forest lands to residential or agricultural uses and protecting agricultural land from development or commercial use. We also support limiting new dwellings on forest lands. | See response to Land Uses comment 61 from the first comment period. |
| **33** | | **Land Use** | I welcome the progress of the clarified Land Use Designation maps (zoning maps) and appreciate the effort that has been invested to develop them. However, as with the Commission's recent adoption of clarified Urban Area Boundary maps, the lack of landowner notification is concerning. The clarified lines have real impacts to private property and in some cases change the development options, permitting requirements and jurisdictional authority. Without notification, landowners have no way to express concern before changes are finalized. Please provide landowners notification of all clarified maps and the process in which to share feedback. If funds are a limiting factor for notification, please inform the counties so we can budget for it. | The Land Use Designation maps for each county clarify LUD boundaries in the GMA and are minor corrections to snap a line to a road or a parcel boundary when it is determined that the intent of the LUD boundary was to follow a specific line. As counties began integrating more accurate tax lot, road centerline, and hydrologic data into their GIS, they found the original digitization of the LUD boundaries didn't align with that more refined data. This created additional uncertainty as to the actual intended locations of the LUD boundaries. Correcting these LUD boundaries was especially important as the legal descriptions were finalized and adopted by the Gorge Commission for the urban area, external and GMA/SMA boundaries to assure the LUD corrections corresponded to the legal descriptions of the boundaries. |

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| **34** | | **Land Use** | I support the addition of cider and locally grown produce to the revised document but would prefer that the language was expanded to include all agriculture products. This would allow for farmers and future farming advancements to employ agriculture uses on agriculture lands as the market demands – supporting our local farming families and agriculture economy. Conditional use permitting mechanisms are currently used and will continue to be used to ensure agriculture processing and production do not adversely impact SNCR resources, surrounding farm and forest lands, nearby residents, or community services. Limiting crop type will not address the underlying concerns expressed by Commissioners at recent meetings which were largely focused on commercial events and the industrial nature of production in any form (scale of production, odors, noise, traffic, etc.). Please reevaluate the tools needed to address your actual concerns and do not unnecessarily restrict farmers from farming. Agriculture is protected by the Act for more than its aesthetic and density. | See responses to Economic Vitality comments 1 and 2 from the first comment period. |
| **35** | | **NR** | We strongly oppose certain revisions in Gorge 2020 affecting private, county, and state forest lands, practices, and resource management in the General Management Area ("GMA"). The Commission has ignored previous comments expressing our concerns. The Commission's actions violate the Columbia River Gorge National Scenic Area Act, (the "Act"), exceed the Commission's legal authority, and conflict with the Washington and Oregon State Forest Practices Acts ("FPAs") and implementing regulations.1 To avoid legal action, we recommend that the Commission properly consider and address our concerns before adopting Gorge 2020. Gorge 2020 does not ensure that forest practices in the GMA will be protected. In fact, it does the opposite. The proposed revisions remove the existing forest protection policies to protect forest lands from uses on nearby lands that conflict with the production of forest products and from conversion of forest lands to residential use. The plan must include provisions to protect and enhance forest lands for forest uses; therefore, these provisions are essential. In addition, the Commission adopted a revision during the August 12 work session, without any public input, prohibiting dwellings on certain forest lands and removing the policy allowing dwellings as necessary to promote efficient growing, propagation, and harvest of tree species. The Commission's intent to substitute protection of forest land for forest uses with resource conservation measures is evidenced by revisions imposing regulation on non-federal forest lands. Gorge 2020 proposes that the first objective for water resources is to "use regulations to avoid adverse effects of development and land use within and near water resources." Similarly, the second objective includes a revision to provide landowners whose property contains or is near water resources with information about "the rationale for regulating new resources in water resources and buffer zones, including cultivation." During the August 12 work session, the Commission adopted a modification to the water resources goals to achieve "no loss of wetlands acreage and functions." Again, the Commission adopted that modification without public input. The modification required staff to propose dozens of changes to the natural resources chapter to implement the new standard. The draft proposes changes to water buffers, including that "[p]proposed uses adjacent to [water resources] shall preserve an undisturbed buffer zone that is wide enough to protect aquatic and riparian areas." Proposing fixed, rather than flexible, buffers is over-protective of water resources and under-protective of forest uses. These revisions impose new standards and requirements beyond the Commission's authority that conflict with the FPAs and other state policies and regulations and disregard the effect on forest lands and uses, a theme reflected throughout Gorge 2020. The Commission's revisions fail to consider the impact of changes to the wildlife habitat chapter that significantly expand restrictions on forest practices. Like the water resources chapter, Gorge 2020 proposes an objective to "[u]se regulations to avoid adverse effects of development and land use within and near Priority Habitat or sensitive wildlife sites" while adding "winter range" to the Priority Habitat list.15 The revisions propose wildlife habitat standards and requirements that would restrict forest practices in many areas of the GMA regardless of existing habitat laws and regulations including plans and permits. The climate chapter proposes to a adopt a policy for forest resources to "protect[] forested lands for timber production which provides for carbon storage [including] siting and development standards, land conversion policies, and other approaches." This provision purports to give the Commission regulatory authority over forest lands. The Commission has little to no regulatory authority under the Act, which requires the counties to implement the Management Plan by adopting local regulations. Furthermore, state management agencies have exclusive regulatory authority over forestry practices in the National Scenic Area. The Commission's utter lack of response to these concerns demonstrates its failure to comply with public notice and comment requirements. The Commission "shall conduct public hearings and solicit public comment prior to final adoption of the management plan." 16 U.S.C. §544d(e). Soliciting public comment without considering the content of those comments is mere perfunctory formality and does not satisfy the Commission's duty under the Act. The eleventh hour revisions, specifically to the wetland loss standards and forest lands policies, which received no public input, further exemplifies the inadequacy of public proceedings. That procedural deficiency is a sufficient basis to challenge the legality of Gorge 2020, independent of the substantive issues. | See response to Natural Resources comment 22 from the first comment period. |
| **36** | | **NR** | I was glad to see the Management Plan include a specific "Climate Change" chapter and believe the urgency of what is underway points to having the plan in place within a year, along with policies addressing mitigation and adaptation in order to ensure protection of human health, wildlife and sensitive plants, and of course the fish who are even now struggling to survive. I realize there is a delicate balance between protections for natural resources (ideally protecting habitat and increasing stream, river, lake and pond buffers) and the pressures of urban development interests which hopefully can be resolved effectively by implementing the proposed limit for "minor revisions" to Urban Area Boundaries.<br>I urge you to adopt the proposed revisions that include:<br>-Stop Urban Sprawl<br>-Act on Climate Change<br>-Protect Habitat and Wildlife<br>-Protect Agricultural and Forest Lands<br>-Keep Rural Lands Rural<br>-Support Equity Policies | See responses to Urban Area Boundary, Climate Change, Natural Resources, Land Uses, and Equity comments from the first comment period. |

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| **37** | | **NR** | Revisions to the Natural Resources chapter will improve outdated buffers for some critical salmon habitat and prevent the destruction of wetlands in the General Management Area while allowing essential development to proceed. Variance and waiver provisions that are already built into the Management Plan and Commission rules will ensure that privately owned property will retain economically beneficial uses.<br>There are several places in the chapter where errors were made in substituting “and” for “or.” These errors actually change the meaning of the associated guidelines.<br>Page 151, 3.B. The elimination of the word “or” means that site plans are only required when the proposed use is within 1,000 feet of both a rare wildlife site and a rare plant site. This should be “and/or” which means either or both of the affected resources.<br>Friends’ recommendation: Retain “and/or” or delete “and” and retain “or.”<br>Page 152 3.C.(3) This is the same issue as above. The elimination of the word “or” means that the determination would be whether the proposed use would result in adverse effects to both wildlife and plants.<br>Friends’ recommendation: Replace “and” with “or” in both places.<br>Page 153 3.D. The same issues as above. This guideline must be applied individually to both wildlife areas or sites and plant areas and sites.<br>Friends’ recommendation: Clarify that proposed development or uses shall not result in adverse effects to wildlife areas or sites, or plant areas or sites.<br>Page 155, Practicable alternatives test: 2.A. and 2.B. Same issues as above.<br>Friends’ recommendation:<br>A. The basic purpose of the use cannot be reasonably accomplished using one or more other sites in the vicinity that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, ~~and~~ wildlife area or site, or ~~and~~ plant areas ~~and/~~or sites.<br>B. The basic purpose of the use cannot be reasonably accomplished by reducing its proposed size, scope, configuration, or density, or by changing the design of the use in a way that would avoid or result in less adverse effects on wetlands, ponds, lakes, riparian areas, ~~and~~ wildlife areas or sites, ~~and~~/or plant areas ~~and/~~or sites. | At its September 2020 meeting, the Gorge Commission voted on a package of clarifying edits that included these suggestions for the Natural Resources Chapter. These are reflected in the spreadsheet of clarifications that accompanies the September meeting minutes. |
| **38** | | **NR** | Protect Salmon Habitat, Wetlands and Wildlife<br>The protection of cold-water refuge streams for salmon is critical. Buffers are not the only answer, but they are critical to protection of these streams. Please support the 200-foot buffer requirement on all salmon-bearing streams.<br>FWSR supports new policies that prohibits the destruction of wetlands by adopting a “no loss” of wetlands policy to apply throughout the National Scenic Area. We ask the Commission to improve all wildlife habitat protections based on the best available science, including expanding protective buffers to 350 feet around ponds and lakes for the endangered Western Pond Turtle. | See responses to Natural Resource comments 1, 6, and 26 from the first comment period. |
| **39** | | **NR** | Salmon and Wetlands Protection: Please adopt draft policies that better protect critical Cold Water Refuge (CWR) streams for salmon, wildlife habitat, and wetlands. Comments from the U.S. Environmental Protection Agency (EPA), Washington Department of Fish and Wildlife (WDFW), and Washington Department of Ecology support 200-foot buffers on priority CWR streams within the GMA, and I support the current revision to widen these buffers on the seven cold water refuge streams identified in the General Management Area. However, all fish-bearing or potentially fish-bearing waterways in all areas of the National Scenic Area should receive this increased protection. Please make continuous review of the 200-foot buffer requirement based on the best available science and improve the buffer protections if necessary, including protections for endangered species – such as prohibiting logging and mining in potential pika habitat. Also, please support new policies that prohibit the destruction of wetlands by adopting a “no loss” of wetlands policy to apply throughout the National Scenic Area. Continue to improve all wildlife habitat protections based on the best available science, such as expanding protective buffers around ponds and lakes to 350 feet for the endangered Western Pond Turtle. | See responses to Natural Resources comments 1, 3, 6, and 26 from the first comment period. |
| **40** | | **NR** | Salmon and Wetlands Protection: Please protect critical Cold Water Refuge streams for salmon, wildlife habitat, and wetlands. Also, please restrict logging and mining. | See response to Natural Resources comments 1, 22, and 26, and response to Scenic comment 42 from the first comment period. |
| **41** | | **NR** | I also urge the commission to adopt the "no loss" wetlands policy and to stop urban sprawl--both of these actions are critical to ensure the health and longevity of our delicate Gorge ecosystems. | See response to Natural Resources comment 26 and Urban Area Boundary comments from the first comment period. |
| **42** | | **NR** | I ask you to incorporate emerging knowledge and conditions such as taking endangered species into consideration by increasing Western Pond Turtle buffer protections around ponds to at least 350’, and by taking a stand to address the rising seasonal temperatures of the Columbia River which are already lethal to migrating salmonids. | See responses to Natural Resources comments 1 and 6 from the first comment period. |
| **43** | | **NR** | I hope you will be able to maintain - and even strengthen - the most protective and multi-species revisions to the plan, to ensure the future of the National Scenic Area. | See responses to Natural Resources comments from the first comment period. |

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| **44** | | **NR** | Support New Policies Protecting Salmon Habitat, Wetlands and Wildlife<br>OCN supports the new policies to better protect “Cold Water Refuge” (CWR) streams for salmon, improve wildlife habitat protection and prohibit the destruction of wetlands. The U.S. Environmental Protection Agency (EPA), Washington Department of Fish and Wildlife (WDFW), and Washington Department of Ecology have expressed support for 200-foot buffers on priority Cold Water Refuge (CWR) streams within the General Management Area of the Gorge. OCN supports the new policies to apply 200-foot protective buffers on the seven CWR streams identified by the EPA. However, all salmon-bearing waterways in the National Scenic Area should receive this increased protection. Please support the 200-foot buffer requirement on all salmon-bearing streams. OCN supports new policies that prohibit the destruction of wetlands by adopting a “no loss” of wetlands policy to apply throughout the National Scenic Area. The Commission should improve all wildlife habitat protections based on the best available science. | See responses to Natural Resources 1 and 26 from the first comment period. |
| **45** | | **NR** | Protect Salmon Habitat, Wetlands and Wildlife Please support draft policies to better protect critical Cold Water Refuge (CWR) streams for salmon, wildlife habitat, and wetlands. The U.S. Environmental Protection Agency (EPA), Washington Department of Fish and Wildlife (WDFW), and Washington Department of Ecology support 200-foot buffers on priority CWR streams within the GMA. ACE supports the current draft policies to widen these buffers on the seven CWR streams identified in General Management Areas. However, all salmon-bearing or potentially fish-bearing waterways in the National Scenic Area should receive this increased protection. Please support the 200-foot buffer requirement on all salmon-bearing streams.<br>ACE supports new policies that prohibit the destruction of wetlands by adopting a “no loss” of wetlands policy to apply throughout the National Scenic Area. We ask the Commission to improve all wildlife habitat protections based on the best available science, including expanding protective buffers to 350 feet around ponds and lakes for the endangered Western Pond Turtle. | See responses to Natural Resources comments 1, 6, and 26 from the first comment period. |
| **46** | | **NR** | Salmon and Wetlands Protection: Comments from the U.S. Environmental Protection Agency (EPA), Washington Department of Fish and Wildlife (WDFW), and Washington Department of Ecology support 200-foot buffers on priority CWR streams within the GMA, and we support the current revision to widen these buffers on the seven cold water refuge streams identified in the General Management Area. However, all fish-bearing or potentially fish-bearing waterways in all areas of the National Scenic Area should receive this increased protection. Please make continuous review of the 200-foot buffer requirement based on the best available science and improve the buffer protections if necessary, including protections for endangered species – such as potential buffers of 350 feet around ponds and lakes for the Western Pond Turtle, or prohibiting logging and mining in potential pika habitat. | See responses to Natural Resources comments 1, 3, 6, and 26 from the first comment period. |
| **47** | | **NR** | “No Loss of Wetlands” is an admirable goal for resource protection, but it is simply not feasible in a landscape that includes both sensitive resources and critical infrastructure. The Columbia River and its multitude of tributaries and nearby water features is developed with major bridge crossings, an interstate and several state highways, two railroads, recreation development that intentionally bring visitors to water features, and culturally significant river access. As proposed, the modified language implies safety related development may occur in wetlands as long as it does not result in loss of feature acreage or function. It is physically not possible to add or modify development to a water feature or its buffer without displacing it in some form. Furthermore, there has been no analysis for the Commission’s consideration of the impacts and unintended consequences that this decision will bring. Requiring a standard of No Loss equates to no maintenance or modifications of critical infrastructure, posing an unnecessary safety risk and undermines our regional resilience for natural hazards planning. Please reject the proposed standard of No Loss and retain the current standard of No Net Loss, which carries the same resource protection obligations of No Adverse Effect (including considerations of cumulative effects) and is consistent with the National Scenic Area Act. | At its September 2020 meeting, the Gorge Commission approved a revised scope of its "no loss" policy recognizing specific types of land uses that may be permitted to impact wetlands with mitigation. See response to Natural Resources comment 26 from the first comment period. |
| **48** | | **NR** | Today, we are in an unprecedented fire event with Santa Ana-like winds, smoke, and high temperatures in the Gorge. This year’s Mosier Creek fire caused many to lose their homes. It’s been three years since the Eagle Creek Fire, and today’s conditions are worse than on that day. Yet, the fire management plan for the Gorge is still a secret and the public cannot inspect it or comment on it. I am here today to ask that the Commission include a periodic public review of the fire management plan for the Gorge in its 2020 Management Plan final draft. This review should happen at not fewer than five-year intervals. Today, we have no stated policy on recreation site closures, no visibility into resource planning, no public involvement in policy decisions, and a lack of communication with the public on fire danger. The only fire closure order in effect on National Forest lands is one dated July 1. The Forest Service’s Twitter account was silent the entire Labor Day weekend, with dangerous fire conditions in the region. | The Management Plan does not direct or manage wildfire emergency response. |

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| **49** | | **Public Comment Process** | On June 1, 2020, the Columbia River Gorge Commission ("Commission") issued a redline of the proposed revisions to the management plan ("June Draft"). The June Draft was the first time the public and stakeholders had the opportunity to review the proposed revisions to the management plan in redline, in their entirety since the beginning of the Gorge 2020 process. When the June Draft was released, staff issued a 30-day public comment period, ending June 30, 2020. There were numerous comments from the public and stakeholders that the 30-day comment period was insufficient time to review the 500+ page plan that had significant revisions to existing policy language and let alone prepare formal written comments. Commenters requested a longer public comment period for the June Draft, which the Commission ignored. The Commission held public meetings on August 11 and 12 to discuss the June Draft and the received comments. Staff subsequently released on another version of the management plan on August 27, 2020, noting it as the September 2020 version ("September Draft"). The September Draft further revises the policy language from the June Draft and includes many revisions that staff have characterized as clarifications or corrections in addition to substantive changes recommended by the Commission from the August meetings. It contains three colors of redline to reflect the reiterative revisions over time. The Commission is scheduled to review and issue a decision on the September Draft on September 8, 2020. The public and stakeholders had less than 6 business days (over a holiday weekend no less) to review and prepare comments on the 500+ page plan with multiple iterative revisions, many of which presented for the first time in the September Draft. This timeframe is woefully inadequate for the public and stakeholders to provide meaningful comments on the September Draft before the Commission makes a decision. It also provides Columbia River Gorge Commission very little time for commissioners themselves to review and consider staff's proposed revisions before being asked to make a decision on September 8, 2020. The Port has raised issues and concerns with the Commission's process and substantive revisions to the management plan in written and oral testimony throughout the Gorge 2020 process. The Port reiterates its concerns with respect to the September Draft and reserves its right to argue on appeal issues that were not previously addressed in earlier written and oral testimony. The Port maintains that many revised policies in the September Draft are inconsistent with the two purposes of the Act and routinely prioritize one purpose of the Act over the other. Many revisions are simply arbitrary in nature and raise questions concerning the breadth of the Commission's discretion. These changes include but are not limited to language in the following sections: Introduction and Glossary; Part I, Chapter 2 Scenic Resources, Chapter 3 Natural Resources, and Chapter 4 Recreation Resources; Part II Land Use Designations; Part III Action Program; and Part IV, Chapter 1 Gorge Commission Role. The Port should not be prejudiced on appeal by the unreasonably short period of time to review and provide meaningful comments on a policy document that has long-lasting, if not permanent changes to NSA policy. To the extent it even applies, the Port has provided the requisite 60-day notice to Commission that it is reserving its rights to challenge the Management Plan revisions on appeal, whether through this letter or its earlier filings. | See response to Public Comment Process comment 1 from the first comment period. |
| **50** | | **Public Comment Process** | Commission staff efforts are to be commended; they have clearly worked very hard to produce a product that attempts to thread together public comment and Commission direction. What is not clear is why the Commission has elected to rush the process and finish the update without adequate analysis or landowner notification. Stakeholders had 30 days to review the first 500+ page draft and six days to review the revised final draft. This timeframe is insufficient for the public and stakeholders to provide meaningful comments. Wasco County has raised issues and concerns with the proposed revisions to the Management Plan in written and oral testimony throughout the Gorge 2020 process. The County reiterates its concerns with respect to the September Draft and reserves its right to argue on appeal issues that were not previously addressed in the County's written and oral testimony. The County should not be prejudiced on appeal by the unreasonably short period of time to review and provide meaningful comments on a policy document that has long-lasting, if not permanent changes to NSA policy. | See response to Public Comment Process comment 1 from the first comment period. |
| **51** | | **Public Comment Process** | Finally, the Gorge 2020 process has failed to afford meaningful opportunities for public involvement. The Commission has pushed this Management Plan update through in the midst of a global pandemic, violating both Oregon and Washington's Sta at Home Orders. We refer to our previous comments on this deficiency, detailed in length in our July 2 Public Comment. | See response to Public Comment Process comment 1 from the first comment period. |
| **52** | | **Scenic** | Revisions to the Scenic Resources chapter will help clarify and prioritize the means by which new development is visually subordinate as viewed from key viewing areas and clarify compatibility standards for new development. | See responses to Scenic Resources comments from the first comment period. |
| **53** | | **Scenic** | I ask you to stop the encroachment of tall wind turbines on the scenic resource now that they have been invented and deployed in siege around the scenic area, grossly violating the intent of the law. If these could have been predicted at the time the law was written the NSA would have to have been much larger to keep these behemoths out of the scenic resource. | The Management Plan does not allow energy production facilities in the National Scenic Area. The National Scenic Area Act does not permit the Management Plan to prohibit wind energy facilities outside the National Scenic Area. |

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| **54** | | **Scenic** | Our primary concern continues to be the replacement of the word “shall” with “may” in the provisions relating to the new production and/or development of mineral resources, and the expansion of existing quarries. See DRAFT MANAGEMENT PLAN, 40 (2020). In its August 11-12, 2020 staff report, Gorge Commission staff summarily dismissed our concern, stating that “[t]he term ‘may be permitted’ is the common terminology for guidelines where development may be permitted when consistent with the goals, objectives, policies and guidelines of the Management Plan.” GORGE 2020 PUBLIC COMMENTS STAFF REPORT, 36 (August 11-12, 2020). If that is the case, officially incorporate the position into the Management Plan. Staff’s cursory and informal interpretation of the distinction between “shall” and “may” does not adequately address this critical language change, which affects the rights and obligations of ZP#5 and other mineral resources users within the NSA.2 The Commission should decline to adopt this language change. In addition to this critical language change, staff has circumvented the public notice and comment process in amending the guidelines for the expansion, exploration, development, and production of mineral resources within the NSA. Subsequent to the June 2020 formal comment period and seemingly without explanation or consultation with the Commission, staff has expanded the buffer distance from key viewing areas (“KVAs”) where mining uses are not permitted. The language change is detailed below. [included text from Draft Management Plan] This change from three to four miles dramatically alters where mining uses are allowed within the Scenic Area and is tantamount to prohibiting mining in the majority of the NSA. This 25% increase in buffering from KVAs was not discussed or noticed for public comment, instead it is yet another attempt by the Commission to achieve its goal of prohibiting mining within the NSA. As has been made clear by our previous comments, the clear and unambiguous language of Section 6d(d)(9) of the National Scenic Area Act (“the Act”) requires the Commission to consider mining within the NSA. The Act also mandates that the Commission provide for the protection and support of the local economies of the Gorge by encouraging growth in urban areas and allowing for future economic development. 16 U.S.C. § 544a. This proposed amendment is an attempt by the Commission to sidestep its nondiscretionary duty under the Act to provide for mining within the NSA and support local natural resource-based industry. This arbitrary and completely unfounded change cannot be upheld. | See response to Scenic Resources comment 35 from the first comment period. |
| **55** | | **UAB** | If I understand your recent vote on urban growth, I think a "thank you" is in order. My feelings on the matter are as follows: The Gorge National Scenic Area is a big reason why people choose to live here and they have entrusted you to protect it. More people live here and want to live here, of course, but solutions exist besides significantly encroaching on and bull-dozing wild and scenic areas. Zoning changes for denser urban development within current boundaries is one of those solutions--especially for additional housing. A vocal minority of developers and profiteers will always insist that "we" need access to more land for "commercial and industrial development," but many of these voices have self-serving agendas. We are experiencing the closure of brick and mortars due to online competition and Covid19, so existing commercial spaces will provide new opportunities. And industrial expansion should be regarded with suspicion, lest outside interests use the opportunity to set up operations in one of our communities only to export the materials while leaving behind degradation, waste and pollution. Please know that the silent majority, the residents that call this home and cherish the scenery and space for recreation, support (and expect) the highest level of protection. | See responses to Urban Area Boundary comments from the first comment period. |
| **56** | | **UAB** | In order to preserve natural resources, we certainly should NOT be increasing urban area boundaries. The most efficient and effective use must be made of the urban lands that already exist. From the National Scenic Act: The purposes of sections 544 to 544p of this title are— (1) to establish a national scenic area to protect and provide for the enhancement of the scenic, cultural, recreational, and natural resources of the Columbia River Gorge; and (2) to protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with paragraph (1) (underline emphasis is mine). I'm sure there have been many long debates about the meaning of these words. To me, the wording of the original act does not refer to balancing protections with economic growth, it is not meant to be a compromise. There is a clear priority. The act refers to supporting and protecting the Gorge area economies by encouraging growth in existing urban areas, and development that is consistent with the first point. How are we protecting and enhancing the scenic, cultural, recreational, and natural resources of the Gorge if we continually chip away at it?? I would ask - is a national scenic area not as sacrosanct as a national park? Would we want increased urban boundaries and development in the Grand Canyon? In Zion? I would also ask, what are the goals of those who would chose to increase urban areas? Do they align with the overall goals of the National Scenic Act? What is the future state that they envision for our National Scenic Area? Will we continue the destructive legacy of a 'bigger, better, faster, more' economy in our treasured Scenic area, or will we discover new and innovation solutions that will protect and enhance both local economies and the environment? Please hold fast on limiting urban boundaries as much as possible. Please keep the original top level, big picture goals of the National Scenic Act in mind, before getting into the weeds of when/what/where/how of urban boundary changes. | See responses to Urban Area Boundary comments from the first comment period. |
| **57** | | **UAB** | Minor Revisions to Urban Area Boundaries<br>The thirteen urban areas in the National Scenic Area include 28,500 acres set aside for urban-scale development. This represents more than 10% of the land area of the National Scenic Area, excluding the Columbia River. Thousands of acres of land set aside for urban development are vacant or underutilized. Urban areas in the Gorge are interdependent and, in the case of The Dalles and Dallesport, have a long history of joint urban planning and development. The new policies for urban area boundary revisions provide clear objective standards for minor revisions to urban area boundaries and require a regional approach to land use and urban planning that is required by the Act. | See responses to Urban Area Boundary comments from the first comment period. |

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| **58** | | **UAB** | Stop Urban Sprawl<br>FWSR also supports limiting urban area expansion into the management areas of the National Scenic Area, period, full stop. Urban sprawl contributes to climate impacts, contributes to the destruction of sensitive and vital wildlife habitat, and promotes unsustainable and reckless urban development planning. We know this has been discussed extensively. However, we continue to prefer no decrease to any Scenic Area management lands. If expansion is to be allowed, as under the current draft, this needs to be carefully and scrupulously managed. There is a large surplus of land available within existing urban areas for future growth, so a regional analysis should always be employed and pursued by the commission to limit urban sprawl and promote the sustainable and responsible economic prosperity of the urban areas. This should be considered and analyzed before any urban area boundary expansion proposal is granted. | See responses to Urban Area Boundary comments from the first comment period. |
| **59** | | **UAB** | Stop Urban Sprawl: I oppose urban boundary expansion in the Columbia River Gorge, especially when there is currently a large surplus of land available within existing urban areas for future growth. While the National Scenic Area Act only allows for minor revisions to urban area boundaries, they must be truly minor in scale and based on a demonstrable need. I recognize that the commission's new policies to limit urban area boundary revisions to 20 acres or 1% of the land area of the urban area, whichever is less, and limit cumulative revisions to 50 acres (or 2%, whichever is less), are compromises reached after many years of public involvement and I support the commission's hard work to define "minor revision." The National Scenic Area Act requires a regional analysis of urban growth capacities. I support the new policy requiring a regional analysis of growth potential within existing urban boundaries. | See responses to Urban Area Boundary comments from the first comment period. |
| **60** | | **UAB** | Limiting urban sprawl, while allowing some growth potential for Gorge communities. | See responses to Urban Area Boundary comments from the first comment period. |
| **61** | | **UAB** | I ask you to prevent further conversion of the scenic, cultural, and natural resources of the gorge into additional urban sprawl. The tiny population of The Dalles, for example, does not merit an expansion at all. The place is less dense than most cities in the state and the downtown is nearly empty. Recycle that land. | See responses to Urban Area Boundary comments from the first comment period. |
| **62** | | **UAB** | I request that you reconsider the decision to allow any expansion of the urban growth boundaries. The urban growth boundary was established by Congress to prevent urban sprawl in the national scenic area. Boundaries are boundaries! Wasco County has requested expanding the urban growth boundary for some time. The commission has caved in to their demand as a compromise to pass the vote. You have opened up expansion by not defining "minor revision" There has to be a specific reason to justify expansion. This has to be reviewed by a case a case application. I thought the plan update was to clarify terminology, reduce areas of confusion, clarify definitions and minor adjustment where needed, incorporating climate change. Please reconsider your urban growth boundaries as it will affect the strength of the National Scenic Act. | See responses to Urban Area Boundaries comments from the first comment period. |
| **63** | | **UAB** | Please stop urban sprawl. The best way to fix carbon which is the key to slowing climate change is allowing nature to thrive. Nature doesn't thrive to the tune of bulldozers and chain saws. This is a world treasure that needs to be protected at all costs. | See responses to Urban Area Boundaries comments from the first comment period. |
| **64** | | **UAB** | Prevent Urban Sprawl - The thirteen designated urban areas in the Gorge comprise 28,500 acres, more than 10% of the land area of the National Scenic Area. Much of the land within the urban area boundaries is currently vacant or underutilized. OCN supports strong limits on urban area boundary expansion, consistent with the requirements of the Act that allow only minor revisions to the urban area boundaries based upon a demonstrable need and consistency with the purposes and standards of the Act. OCN supports the Commission's current compromise proposal to limit minor revisions to 20 acres or 1% of the land area of the urban area, whichever is less; and limit cumulative revisions to an urban area boundary to 50 acres or 2%, whichever is less. OCN supports the new draft policy requiring a regional analysis of buildable lands within urban areas to determine a demonstrable need for a boundary adjustment, as required by the Act. | See responses to Urban Area Boundaries comments from the first comment period. |
| **65** | | **UAB** | Neither residents of the National Scenic Area nor its visitors live, work or recreate here for the love of sprawl. Creative problem solving and innovative urban planning practices keep our existing urban areas utilized or revitalized in the best possible ways. We need to stay committed to this.<br>I oppose urban area boundary expansion when there is still a surplus of developable land available within existing urban areas. I recognize that the commission's new policies to limit urban area expansions to 20 acres or 1% of the land within the existing urban area, whichever is less, and limit cumulative revisions to not exceed 50 acres (or 2%, which ever is less) are compromises reached after many years of public involvement and I support the commission's work to define "minor revision." I also support the new policy requiring a regional analysis of growth potential within existing urban boundaries.<br>Wise management of the Gorge's urban boundaries is so important and it positively addresses other items in the Management Plan as well. Limiting urban sprawl helps protect farm and forest land as well as habitat and wildlife. Vibrant, compact, livable towns foster walkable, bike-able communities that are less reliant on cars and help to lower carbon emissions that cause climate change. | See responses to Urban Area Boundaries comments from the first comment period. |
| **66** | | **UAB** | Submitted a compilation of demographic data from NSA counties, MCEDD, and the US Census, entitled "Population Demographics of Columbia River Gorge National Scenic Area: A brief set of facts compiled by NSA County Planning Departments to inform Gorge 2020" | The Gorge Commission appreciates this information and has posted this on its website. |
| **67** | | **UAB** | It is essential you enact changes that strengthen the original purpose of the National Scenic Area, Limiting urban invasion and protecting this beautiful, irreplaceable national treasure, as proposed by Friends of the Gorge. | See responses to Urban Area Boundaries comments from the first comment period. |

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| **68** | | **UAB** | The National Scenic Area Act is not a "Temporary Moratorium" on building. The urban area boundaries are just that, boundaries. There is language in the plan that allows for an expansion if there is a specific need, and it must be scrutinized to prove there is truly a need. This language should be left alone. For a city leader to simply say "We need to expand the Urban Growth Boundary to allow more development to occur," is counter to the intent of the NSA. The reason the NSA was created was to protect this Gorge for current and future generations to see and enjoy its beauty. To allow cities to expand in size every few years will eventually create the urban sprawl you are supposed to be preventing! You should be clarifying language, clarifying definitions, incorporating climate change issues, and making the guidelines easier to understand, YOU SHOULD NOT BE REWRITING the plan to allow significant changes such as expansions of the urban grows boundaries. Again....the NSA was designed to prevent urban sprawl, not just slow it down. You have wasted a ridiculous amount of time on this topic, time that would have been better spent on enforcement issues. By giving the green light to expanding Urban Growth Boundaries you have changed the intent of the National Scenic Area Act. You do NOT have the authority to make that change. | See responses to Urban Area Boundaries comments from the first comment period. |
| **69** | | **UAB** | Stop Urban Sprawl ACE also supports limiting urban area expansion into the management areas of the National Scenic Area as much as possible. Urban sprawl contributes to climate impacts, adds to the destruction of sensitive and vital wildlife habitat, and promotes unsustainable and reckless urban development planning. ACE prefers no decrease to any Scenic Area management lands, but supports the commission's current proposal to limit urban area boundary revisions to 20 acres or 1% of the land area of the urban area, whichever is less; and limit cumulative revisions to, at most, 50 acres (or 2%, whichever is less), so long as all other potential impacts continue to be properly analyzed and accounted for. There is a large surplus of land available within existing urban areas for future growth, so a regional analysis should always be employed and pursued by the commission to limit urban sprawl and promote the sustainable and responsible economic prosperity of the urban areas. This should be considered and analyzed before any urban area boundary expansion proposal is granted. | See responses to Urban Area Boundaries comments from the first comment period. |
| **70** | | **UAB** | Urban Areas: According to the Scenic Area Act, only minor revisions to urban area boundaries are allowed. We support the commission's current proposal to limit urban area boundary revisions to 20 acres or 1% of the land area of the urban area, whichever is less; and limit cumulative revisions to, at most, 50 acres (or 2%, whichever is less), so long as all other potential impacts continue to be properly analyzed and accounted for. The City of Hood River has a 20-year supply of residential land for development according to a 2015 Housing Needs Analysis. The Commission should conduct a regional analysis prior to proceeding with any urban area boundary expansion to limit urban sprawl and promote the sustainable and responsible economic prosperity of the urban areas. | See responses to Urban Area Boundaries comments from the first comment period |
| **71** | | **UAB** | The Urban Area boundary expansion policy decision of "fifty acres forever" is problematic and should be removed prior to final approval. The Act does not require the Commission to identify a cap or maximum number of acres for minor modifications. In doing so, you are arbitrarily concluding the options available to 13 cities and communities that vary dramatically in scale and needs. | See responses to Urban Area Boundary comments from the first comment period. |
| **72** | | | "Clarifications, non-controversial and minor edits" are not necessarily non-substantive edits. Due to the short period of time in which to review the final revised document, it is simply not clear yet how substantive any of these changes may be. One example of a possible substantive "minor edit" includes the addition of language that states: "…and requirements to bring pre-Act development into compliance with National Scenic Area standards…" (page 15). Under current regulations, pre-Act development is not required to comply with the Act unless it is being replaced with new development. Additions and modifications would be subjected to compliance, but not the pre-Act portions of the structure. As proposed, this language is lacking context needed to be clear and it is controversial. | All clarifications, non-controversial, and minor edits were made with existing or endorsed language in mind. For this specific example in the Introduction, these requirements exist and are not new/proposed (for example, square footage limitation on accessory buildings applies even if all accessory buildings are pre-Act). Reference to them here does not imply that all pre-Act development must immediately come into compliance with the Draft Management Plan upon its adoption. |

## Attachment E(1): PUBLIC MEETINGS FOR "GORGE 2020" MANAGEMENT PLAN REVIEW AND UPDATE

**COMMISSION MEETINGS**

| Date | Gorge 2020 Topic | Location |
|---|---|---|
| 10/11/2016 | Roadmap and Timeline | Stevenson |
| 11/08/2016 | Workshop/Workplan | White Salmon |
| 12/13/2016 | Listening Sessions Preparation | Hood River |
| 02/14/2017 | Summary of Listening Sessions | Vancouver |
| 03/14/2017 | Summary of Public Comments | Portland |
| 04/11/2017 | Results of Scoping Process | Hood River |
| 07/11/2017 | Data Inventory and Setting Priorities | Stevenson |
| 10/10/2017 | Adoption of New Timeline and Workplan | Stevenson |
| 02/13/2018 | Climate Experts Panel | Hood River |
| 04/10/2018 | Urban Area Boundary Revision Background | Stevenson |
| 05/08/2018 | UAB Workshop 1 | Camas |
| 06/12/2018 | UAB Workshop 2 | The Dalles |
| | Natural Resources Tech Team Update | |
| 09/11/2018 | Land Uses Introduction | Maryhill |
| 10/31/2018 | Government to Government Meeting with 4 Treaty Tribes | Pendleton |
| 11/13/2018 | Scenic Resources Introduction | Stevenson |
| 12/11/2018 | Natural Resources Proposed "Redlines" | Hood River |
| 01/22/2019 | Natural Resources Proposed "Redlines" | Call-In |
| 03/12/2019 | Economic Vitality Work Group Update | Cascade Locks |
| | Recreation Resources Introduction | |
| 04/19/2019 | Land Use Designations Mapping Corrections | Troutdale |
| 05/14/2019 | Natural Resources Technical Revisions | Camas |
| 08/13/2019 | Re-adoption of Roadmap and Timeline | The Dalles |
| | Natural Resources Technical Revisions | |
| | Economic Vitality Work Group Update | |
| 09/10/2019 | Urban Area Boundary Revision Work Group Report | White Salmon |
| | Recreation Resources Update | |

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|---|---|---|
| 10/08/2019 | Climate Change-Wozniak Report | Cascade Locks |
| 11/12/2019 | Urban Area Boundary Discussions | Stevenson |
| | Land Uses Update | |
| 12/10/2019 | Urban Area Boundary Revision Discussion | White Salmon |
| | Land Uses Update | |
| | Economic Vitality Work Group Update | |
| 01/21/2020 | Urban Area Boundary Revision Discussions | White Salmon |
| | Roadmap and Timeline Update | |
| | Prioritize Issues for Commission Discussion-Rainbow Chart | |
| 02/11/2020 | Draft Strategies and Actions for Climate Adaptation and Mitigation Climate Change Chapter | Cascade Locks |
| | Urban Area Boundary Revision Discussion | |
| 04/14/2020 | Land Uses Update | Zoom |
| 04/28/2020 | Scenic Resources Chapter Redline | |
| | Economic Chapter Redline | |
| 04/29/2020 | Natural Resources Chapter Redline | Zoom |
| | Land Uses Chapter Redline | |
| | Climate Change Vision and Roles Chapter | |
| 05/12/2020 | Climate Change Chapter | Zoom |
| | Recreation Resources  Chapter Redline | |
| 05/26/2020 | Urban Area BoundaryRevision Redline | Zoom |
| | Climate Change Chapter | |
| 06/11/2020 | Staff Presentations on Draft Gorge 2020 Edits by Topic | Zoom |
| 06/25/2020 | Oral Public Comment Session | Zoom |
| 08/11/2020 | Climate Change Chapter | Zoom |
| | Urban Area Boundary Revision | |
| 08/12/2020 | Land Uses | Zoom |
| | Natural Resources Chapter | |
| | Recreation and Economic Development | |
| | Equity | |

| | | |
|---|---|---|
| 09/08/2020 | Diversity, Equity, Inclusion | Zoom |
| | No loss of Wetlands Revision | |
| | Agricultural Products Processing Provisions | |
| | Non-Controversial Proposed Edits | |

**Urban Area Boundary Focus Topic Workgroup**

| Date | Presentation | Location |
|---|---|---|
| 07/24/2018 | Urban Area Boundary Revision Policy Public Workshop | White Salmon |
| 08/01/2018 | Urban Area Boundary Revision Policy Public Workshop | White Salmon |
| 08/21/2018 | Urban Area Boundary Revision Policy Public Workshop | White Salmon |
| 09/17/2018 | Urban Area Boundary Revision Policy Public Workshop | White Salmon |
| 10/15/2018 | Urban Area Boundary Revision Policy Public Workshop | White Salmon |
| 11/19/2018 | Urban Area Boundary Revision Policy Public Workshop | White Salmon |
| 08/14/2019 | Urban Area Boundary Revision Policy Public Workshop | White Salmon |

**Economic Vitality Focus Topic Workgroup**

| Date | Presentation | Location |
|---|---|---|
| 06/13/2018 | Economic Vitality Work Group | Cascade Locks |
| 08/15/2018 | Economic Vitality Work Group | White Salmon |
| 10/10/2018 | Economic Vitality Work Group | Hood River |
| 11/28/2018 | Economic Vitality Work Group | White Salmon |
| 01/23/2019 | Economic Vitality Work Group | White Salmon |
| 09/24/2019 | Economic Vitality Work Group | The Dalles |

**Natural Resources Technical Team**

| Date | Presentation | Location |
|---|---|---|
| 05/03/2018 | Natural Resources Tech Team | Hood River |
| 05/23/2018 | Natural Resources Tech Team | Call-in |
| 06/07/2018 | Natural Resources Tech Team | Call-in |
| 06/21/2018 | Natural Resources Tech Team | Call-in |
| 07/19/2018 | Natural Resources Tech Team | Call-in |
| 07/30/2018 | Natural Resources Tech Team | Hood River |

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|---|---|---|
| 11/08/2018 | Natural Resources Tech Team - Forest and Fire Provision | White Salmon |
| 12/20/2018 | Natural Resources Tech Team | Call-in |
| 04/10/2019 | Natural Resources Tech Team | Call-in |

**Recreation Resources Focus Topic Meetings**

| Date | Presentation | Location |
|---|---|---|
| 03/08/2019 | Recreation Technical Team | Hood River |
| 04/04/2019 | Recreation Technical Team | Hood River |
| 05/16/2019 | Recreation Technical Team | Hood River |
| 06/05/2019 | Recreation Technical Team | Hood River |
| 08/08/2019 | Recreation Stakeholder Meeting | Cascade Locks |
| 10/01/2019 | Recreation Stakeholder Meeting | Stevenson |
| 10/22/2019 | Recreation Public Meeting | Carson |

**Land Uses Public Workshops**

| Date | Presentation | Location |
|---|---|---|
| 10/11/2018 | Landowner Open House with UCD | White Salmon |
| 06/06/2019 | Landowner Open House with UCD | White Salmon |
| 08/14/2019 | Public Workshop- Gorge 2020 Land Uses Focus Topic | White Salmon |
| 09/12/2019 | Public Open House- Gorge 2020 Land Uses Focus Topic | Hood River |
| 10/03/2019 | LU Focus Topic Stakeholder Meeting: Working Lands in the NSA | Hood River |

**Gorge 2020 Public abd Treaty Tribe Outreach Meetings**

| Date | Presentation | Location |
|---|---|---|
| 11/14/2016 | The Dalles City Council, Plan Review Scoping | The Dalles |
| 11/15/2016 | Bingen City Council, Plan Review Scoping | Bingen |
| 11/16/2016 | White Salmon City Council, Plan Review Scoping | White Salmon |
| 11/21/2016 | Hood River County Commission, Plan Review Scoping | Hood River |
| 11/22/2016 | Skamania County Commission, Plan Review Scoping | Stevenson |
| 11/22/2016 | North Bonneville City Council, Plan Review Scoping | North Bonneville |
| 11/28/2016 | Cascade Locks City Council, Plan Review Scoping | Cascade Locks |
| 12/12/2016 | Hood River City Council and Planning Commission, Plan Review Scoping | Hood River |

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|---|---|---|
| 12/20/2016 | Klickitat County Commission, Plan Review Scoping | Goldendale |
| 12/21/2016 | Wasco County Board, Plan Review Scoping | The Dalles |
| 01/04/2017 | Clark County Board - Gorge 2020 overview, FAQs, and road map discussion | Vancouver |
| 01/15/2017 | The Dalles Planning Commission, Plan Review Scoping | The Dalles |
| 01/24/2017 | Hood River Listening Session - Gorge 2020 overview, FAQs, and road map discussion | Hood River |
| 01/25/2017 | Mosier City Council, Plan Review Scoping | Mosier |
| 01/25/2017 | Skamania County Commission - Gorge 2020 overview, FAQs, and road map discussion | Stevenson |
| 01/31/2017 | N Bonneville Listening Session - Gorge 2020 overview, FAQs, and road map discussion | North Bonneville |
| 02/23/2017 | MCEDD Board Meeting - Gorge 2020 overview, FAQs, and road map discussion | The Dalles |
| 02/28/2017 | Hood River Lions Club | Hood River |
| 02/28/2017 | Listening Session The Dalles - Gorge 2020 overview, FAQs, and road map discussion | The Dalles |
| 03/02/2017 | Mt. Adams Chamber event - Gorge 2020 overview, FAQs, and road map discussion | White Salmon |
| 03/02/2017 | Multnomah County Board, Plan Review Scoping | Portland |
| 03/14/2017 | Troutdale City Council, Plan Review Scoping | Troutdale |
| 03/16/2017 | Stevenson City Council, Plan Review Scoping | Stevenson |
| 03/27/2017 | Washougal City Council, Plan Review Scoping | Washougal |
| 04/04/2017 | Warm Springs Tribal Council - Gorge 2020 overview, FAQs, and road map discussion | Warm Springs |
| 04/11/2017 | Troutdale City Council - Gorge 2020 overview, FAQs, and road map discussion | Troutdale |
| 04/18/2017 | Federal Caucus on Columbia River - Gorge 2020 overview, FAQs, and road map discussion | Portland |
| 05/02/2017 | Umatilla Tribe Cultural Committee - Gorge 2020 overview, FAQs, and road map discussion | Pendleton |
| 05/05/2017 | Yakama Nation Tribal Council - Gorge 2020 overview, FAQs, and road map discussion | Toppenish |
| 06/20/2017 | Oregon Tourism Commission - Gorge 2020 overview, FAQs, and road map discussion | Bend |
| 06/27/2017 | White Salmon River Fest - Gorge 2020 overview, FAQs, and road map discussion | Underwood |
| 07/18/2017 | Klickitat County Democrats Association-Gorge 2020 overview, FAQs and road map | White Salmon |
| 07/25/2017 | PNW Economic Region Summit-Gorge 2020 presentation | Portland |
| 08/09/2017 | Regional Solutions Meeting-Gorge 2020 presentation | The Dalles |
| 10/25/2017 | One Gorge Group-Gorge 2020 Presentation | Hood River |
| 11/21/2017 | Klickitat Conservation District Board-Gorge 2020 presentation | Goldendale |
| 11/28/2017 | Nez Perce Tribal Council-Gorge 2020 | Lapwai, ID |
| 01/03/2018 | Hood River Grange -Gorge 2020 presentation- | Hood River |

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|---|---|---|
| 01/18/2018 | Ice Age Floods Institute-Gorge 2020 presentation | Tualatin |
| 01/22/2018 | Umatilla Tribe Cultural Staff -Gorge 2020 presentation | Pendleton |
| 01/25/2018 | Land Conservation and Development Commission-Gorge 2020 presentation | Hood River |
| 02/06/2018 | Public Meeting-Gorge 2020 Overview | Corbett |
| 02/07/2018 | Public Meeting-Gorge 2020 Overview | Camas |
| 02/15/2018 | Public Meeting-Gorge 2020 Overview | Stevenson |
| 02/20/2018 | Quarterly Planners Meeting | White Salmon |
| 02/20/2018 | Public Meeting-Gorge 2020 Overview | The Dalles |
| 05/15/2018 | Quarterly Planners Meeting | White Salmon |
| 07/31/2018 | VSI and Gorge2020 | Willard |
| 08/15/2018 | County Planning Directors Meeting | Hood River |
| 08/20/2018 | Hood River County Commission Meeting | Hood River |
| 08/21/2018 | Quarterly Planners Meeting | White Salmon |
| 10/22/2018 | County Planning Directors' Meeting | White Salmon |
| 11/20/2018 | Quarterly Planners Meeting | White Salmon |
| 02/19/2019 | Quarterly Planners Meeting | White Salmon |
| 04/16/2019 | Gorge Fisheries and Watershed Science Conference | The Dalles |
| 03/06/2019 | County Planning Directors Meeting | White Salmon |
| 05/21/2019 | Quarterly Planners Meeting | White Salmon |
| 05/30/2019 | County Planning Directors Meeting | White Salmon |
| 06/06/2019 | Landowner Open House with Underwood Conservation District | White Salmon |
| 06/19/2019 | One Gorge-Gorge 2020 Update | Hood River |
| 08/05/2019 | County Planning Directors Meeting | White Salmon |
| 08/08/2019 | Kiwanis Meeting-Gorge 2020 Update | The Dalles |
| 08/14/2019 | Public Workshop- Gorge 2020 Land Uses Focus Topic | White Salmon |
| 09/12/2019 | Public Open House- Gorge 2020 Land Uses Focus Topic | Hood River |
| 09/17/2019 | Quarterly Planners Meeting | White Salmon |
| 09/24/2019 | Central OR Planners Meeting-Gorge 2020 Update | The Dalles |
| 10/03/2019 | LU Focus Topic Stakeholder Meeting: Working Lands in the NSA | Hood River |
| 10/16/2018 | Mid-Columbia Association of Realtors Meeting- Land Uses and Development Reviews | The Dalles |
| 01/22/2020 | Eastern WA Planners Forums -Gorge 2020 Update | Moses Lake, WA |
| 02/03/2020 | Quarterly Planners Meeting | White Salmon |
| 03/09/2020 | The Dalles City Council-Gorge 2020 Update | The Dalles |
| 05/19/2020 | Quarterly Planners Meeting | Zoom |