

June 30, 2020

RE: Management Plan for the Columbia River Gorge National Scenic Area

General Concerns of the overall process of developing the New Management Plan:

- The CRGC has been discussing policy changes and concepts over the past two years but this is the first time the public has seen the proposed redline revisions to the Management Plan.
- There are policy changes in almost every chapter of the plan, a whole new Climate Change chapter, and complete rewrites of several plan sections, including the section governing urban area boundary revisions.
- The proposed revisions were released to the public on June 1, 2020 and formal public comments are due on June 30, 2020. Staff will present a summary of the public comments to the Commission on July 21, 2020 and the Commission will deliberate and provide staff feedback. The final, revised Management Plan will be presented to Commission for approval at the August 2020 meeting.
- A 30-day formal public comment on 500+ pages of new redline language is inadequate time for meaningful public review and participation, particularly considering the breadth of the policy changes and the permanent impacts of such changes on our Gorge communities. It seems unrealistic, or at best, unauthentic, that staff could review and compile 1000+ comments within 21 days and be ready to meaningfully engage the Commission during a one-day Commission hearing on July 21, 2020. The proposed schedule is simply a pretense for meaningful participation but in reality, is a contrived public process.

Suggested Management Policies Revisions:

pg 156: Please recognize that fishing has become worldwide destination activity in the gorge and not just an activity or opportunity, "the Gorge has become a worldwide destination for a variety of recreation activities. These have expanded to include newer activities such as windsports, sailing, rafting and cycling."

pg 164: GMA Objective 1. Keep the word "Increase" and do not replace with "Provide" as we need to increase safe and accessible opportunities for the public.

pg 166-167: The Goal to increase public understanding and appreciation of the natural resources is stated but when put into policy (on page 167), it is stated that consulting is related to Tribal only. We need to have all cultures represented in the efforts to increase the public's understanding and appreciation.

pg 167: add back "A. Promote the Columbia River as a scenic waterway trail and support dispersed boat moorages and other low-intensity boating facilities to implement this objective."

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.]*

pg 217, section L: Remove "primarily grown" and add back "raised". Add back "and other agriculture properties in the local region"

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.

Sincerely,



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