



PLANNING DEPARTMENT

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Pioneering pathways to prosperity.

March 8, 2017

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Subject: Comments for the Gorge 2020 Management Plan Review and Update Process

Greetings Columbia River Gorge Commissioners and Staff,

Thank you for the opportunity to provide formal comments on the Gorge 2020 Management Plan review and update process. To date, Wasco County staff has attended two of the three Gorge 2020 listening sessions, provided feedback at the February 2017 Gorge Commission meeting, and has now met with Gorge Commission staff to discuss several of the comments listed below.

The Columbia River Gorge is world renowned for being a beautiful place to live, work, and play. Its scenic landscapes, public recreation opportunities, abundant natural and cultural resources, working farms, and diverse collection of communities are worthy of our efforts to protect and enhance for current residents and visitors as well as future generations. Wasco County feels strongly that this must be done in a manner that allows our residents a successful existence and every opportunity to prosper - while ensuring the landscape is sustainably managed to endure the influx of visitors.

An update to the Management Plan is welcome and much needed. We applaud your efforts to get this underway. As you know, we have voiced concerns regarding the need for additional community outreach to ensure the process is well informed by those most affected. That said we remain committed to assist the Gorge Commission in their efforts to achieve timeline goals and a successful update. Examples of our efforts to assist and collect local feedback include sending our staff to meet with yours on several occasions to discuss process suggestions and regional and historical context; outreach to our affected urban area leadership, economic development agency, port districts, transportation partners, fire departments and forestry/fire agencies; and a recently mailed public notice to all affected landowners in Wasco County pointing them to Gorge Commission resources and staff for additional information. We will be hosting a public meeting on April 11, 2017 that will include a brief overview of

Gorge 2020 and how to get involved. We will collect and share any additional feedback received at this meeting.

This comprehensive update effort is a rare opportunity to evaluate the successes and short comings of the current plan, including its impacts to our residents. We have categorized our comments below into policy level needs, formatting suggestions and specific changes to existing rules for your consideration.

Policy Level Needs:

- Incorporate the local vision with the national vision, based on feedback from each community.
- Clarify roles and responsibilities, and empower partner agencies and organizations that have specifically developed plans to achieve goals supported by the National Scenic Area Act. Examples include: MCEDD, ODOT, WSDOT, ODF, WA DNR, and other local public entities determined to be appropriate (please take the time to identify and understand those plans).
- Provide policy direction necessary to guide the urban area expansion process (define “minor”).
- Revise the treaty rights consultation process to ensure local governments are not in a position of liability and to ensure the consultation process is occurring as effectively as possible.
- Provide implementation guidance and technical assistance to ensure consistency and continuity of regulatory implementation from staff to staff.
- In coordination with each community, prepare a buildable lands survey that addresses the supply of land available for housing, commercial and industrial uses in each community.
- Evaluate current zoning and make changes where appropriate based on land use trends and available resources.
- Address trends in recreation and agriculture related tourism and identify how it will be balanced to ensure a sustainable economic impact, sensitive to natural and cultural resources, and will not negatively impact the livability of our residential communities.
 - Address community costs of recreation and agri-tourism, as well as the benefits, to provide a holistic source of information that can be used to set policy.
 - Overcrowding and overuse of natural sites, unmanaged uses, traffic congestion and parking issues, impacts of transit, treaty rights conflicts, degradation of resources, etc.
 - Address the impacts of recreation and tourism on emergency service providers. In some cases, demands on our local EMS services have exceeded local resource capacity. EMS services are assumed to be sufficient without coordination. We are unable to ensure a safe experience on our landscapes. These increases in demand also remove services from our local communities to serve visitors.
 - Need to assess the quality of protected resources that are being “loved to death”, and either (1) rezone and remap to allow resource managers to meet current vision and resource protection requirements or (2) mitigate to meet current rules.
- Address community needs that in some cases may only be met outside of urban areas.
- Address the demand for short term rentals and accessory dwelling units in the Gorge.
- Address regional energy planning issues and needs.
- Address climate change through reference to each county’s natural hazard mitigation plan already prepared to comply with FEMA requirements.
- Identify emerging issues that will affect our residents, visitors, emergency services, industries and agriculture operators over the next twenty years.

Formatting Suggestions:

- Pull out and reference implementation strategies to allow for more frequent updates.
- Insert a user's guide upfront to help readers use the document(s) more easily.
- Make the document is word searchable and linked for important cross-references.

Specific Changes:

- Set the expectation for each land use designation by referencing the landscape settings and identifying for the reader that most landscapes are protected as "working landscapes" not simply for "natural" appearances with limited development.
- Allow for a list of "Type 1" review uses (uses with no or low impact that qualify for an over-the-counter review and do not require public notice).
- Expand the economic development chapter to incorporate existing economic development plans to allow the Management Plan to act as a more living document and reflect changing economies in the Gorge. Add a transportation chapter to incorporate existing transportation plans, for the same reason.
- Expand winery uses to allow for similar development, including cideries, and clarify the intent for distilleries, farm stands, concerts, food sales, commercial "farm" dinners, weddings, winery hiking trails ("wiking"), bike tours and races that stop at these locations, and other events.
- Prepare a recreation master plan to identify the recreation "build-out" of the NSA. This will allow for the goals of the NSA Act to be met, provide certainty for communities who are relying on recreation development for tourism plans, set a threshold for resource impacts brought on by recreation, identify current and future management needs, and cap the number of properties taken out of private ownership (and off the local tax base) for recreation purposes.
- Clarify whether running, bicycle and other races and events occurring on private and public lands are commercial events that require review and resource impact analysis.
- Remove the scenic compatibility analysis as a means to determine the size of new development as it can unfairly impact new development occurring in landscapes that have no development or limited development.
- Exempt or refine resource protection language for critical infrastructure projects that must be in the immediate vicinity of protected resources.
- Allow roof mounted solar panels that are black with black frames, and not encased in glass, to be allowed without a Scenic Area permit.
- Provide mechanisms to allow agriculture labor housing clusters that meet a community need as opposed to being limited an individual farm's need.
- Exempt wildfire emergency responses from the requirements of the emergency response provisions or any other Scenic Area review process.
- Incorporate by reference and require new development to comply with the NFPA and Firewise Communities program (updates defensible space, water and access requirements, materials and landscaping requirements for wildfire prevention).
- Work with State and Federal forestry programs to allow for proactive forest health management on private and public lands to reduce fire risk and invasive species (e.g. beetle damage).
- Allow for ballfields and other community park amenities necessary for Gorge youth.
- Support local schools and fire departments with flexibility in rule language to add, replace and improve facilities to support the existing communities.
- Address long-term utility needs that need to be met outside of Urban Areas (e.g. communications towers, water towers and other collection facilities, waste water treatment for dense rural residential areas, etc.)

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- Allow for transfer of development rights to enable creative development that also protects resources.
- Add in ORS language that would allow for the legalization of illegal parcels that would have qualified at the time of creation (ORS 92.176)

Since the adoption of our local NSA Ordinance in 1994, we have reviewed hundreds of development requests. Our staff is well versed in Scenic Area rules, regulations and regional policies and is very familiar with the concerns of our affected residents. In order to be successful, the revised plan must work for our residents and must be possible to implement with existing resources. **We request that you strongly consider our comments, and continue to seek our feedback moving forward.**

Thanks again for allowing us the opportunity to provide formal comments. Please contact me directly with any questions or concerns.

Sincerely,



Angie Brewer, AICP
Planning Director

Cc: Tyler Stone, Wasco County Administrative Officer and the Wasco County Board of Commissioners