



September 10, 2019

Columbia River Gorge Commission
PO Box 730
White Salmon, WA 98672

Subject: Urban Area Boundary Policy Public Workshops

Greetings Commissioners,

Thank you for the opportunity to provide feedback on the status of the Urban Area Boundary Policy Public Workshops and draft product. Wasco County has been an active participant in all aspects of the Gorge 2020 Management Plan update process and appreciates the efforts made by the Gorge Commission staff to include local implementing agencies and affected communities in the review process.

We formally support the Staff memo suggested next step of pursuing a professional facilitator to provide a neutral, consensus based approach of identifying key concepts and goals before additional policy is drafted or considered for adoption by the Commission. **Wasco County is prepared to assist financially with this effort to ensure it occurs, and appreciate that consensus does not presume any particular outcome.**

For the following reasons, we believe this step to be critically important for this unavoidably complex and impactful policy making process:

Urban Area boundary policy will guide the future growth patterns of all gorge communities – and as a result, the way needs and goals of residents and visitors are planned for and met. This directly impacts foundational aspects of our communities like tax base, transportation and transit, emergency services, schools and related facilities, housing, commercial and industrial development, recreation and more.

Draft policies reviewed at Workshop # 5 and Workshop # 6 are dramatically different from one another and with very little explanation for the change. We are particularly concerned there are only two options currently being discussed, neither of which provide due process for a request to amend one urban area for long-term growth needs. Instead, there is a limited duration land trade option of 20 acres or less and a much larger regional approach that requires a multi-state, multi-county, and multi-city process. As well, the two drafted options are inconsistent in their levels of Gorge Commission oversight, and leave many questions as to how a local community is expected to navigate either process successfully.

Specific Concerns

Land trade concept:

- Limited to 20 acres and requires a trade that results in no net expansion to the urban area.
- Assumes there is land to trade.
- 20 acres is not likely to accommodate 20 years of growth and is therefore only relevant to infrastructure or other limited scope efforts.
- One year to use it or it reverts back to the GMA; If approval expires, there is a net loss to urban area acreage.
- Development agreements must be signed with the Commission for 30 year timelines.
- Gorge Commission creates new compliance authority inside the new urban areas, stripping the local jurisdictions of their land use related police powers and creating a third layer of zoning authorities and process.

Regional approach:

- The draft language appears to be incomplete and awaiting guidance from the Gorge Commission; we look forward to being part of the discussion as this draft is further refined.
- The draft language identifies requirements that will likely take several years to complete.
- The draft indicates an outcome that is limited to the development of strategies and performance metrics, not an actual revision or expansion.

Bigger picture concerns:

- The draft options expand four criteria into more than nine (incomplete) pages of new requirements. The draft creates new obligations, requires costly studies, and assumes all communities in the same region have enough commonalities to develop a shared city.
- Although not specifically stated, the discussions to date assume the only need is housing. Housing is only one aspect of planning for the viability of our communities and resources. For example, schools are in particular need of new sites for new campuses, athletic facilities and other community facilities appropriate for communities of our size. Similarly, light commercial uses are also important to support residential development – ensuring communities remain walkable and minimize vehicular commute for necessary services. This kind of forethought reduces overall carbon footprint of new residential development and ensures families have the amenities needed to thrive in the Gorge. An inability to support families results in a struggling community and a failure of public service to our residents.
- Asserting Gorge Commission authorities into new Urban Area lands and zones is a significant policy shift from the last 30+ years of Scenic Area Act implementation and regional coordination. Doing so adds a third layer of zoning and enforcement, creates an administrative burden on already constrained programs, asserts local jurisdictions will pay for Gorge Commission enforcement, and removes land use related police powers from cities and counties.
- The Commission is attempting to find a one-size fits all approach for communities that are very diverse socioeconomically, have different needs and vastly different resources

to pay for the new procedural requirements. The Gorge Commission may want to consider developing a technical assistance grant program similar to the state of Oregon to ensure all communities have an equal opportunity to address the needs of their population and resources.

Thank you for the opportunity to comment. We look forward to continued participation in this effort.

Sincerely,



Angie Brewer
Planning Director



Tyler Stone
Chief Administrative Officer