May 21, 2020

## VIA EMAIL

Governor Kate Brown Office of the Governor 900 Court Street NE, Suite 254 Salem, OR 97301-4047

## **Re:** Columbia River Gorge Commission Proposes Management Policies that Eliminate Opportunities for Future Growth in Gorge Urban Areas

Dear Governor Brown:

We write to raise to you our collective concerns over the Columbia River Gorge Commission's proposed amendments to the *Management Plan for the Columbia River Gorge National Scenic Area* ("Management Plan"), amendments that would significantly diminish economic development opportunities for all urban areas in the Gorge. Not only are we concerned about the substance of the proposed amendments, but also the process the Columbia River Gorge Commission ("Commission") is using to push through significant policy changes, policy changes that will have permanent ramifications on our Gorge communities. The process lacks transparency, fails to give adequate, and meaningful, opportunity for public and stakeholder engagement, and raises questions about compliance with state public meeting laws.

The two equal purposes of the Columbia River Gorge National Scenic Area Act ("Act") are:

- "\*\*\* [t]o protect and provide enhancement of the scenic, cultural, recreational, and natural resources of the Columbia River Gorge," and
- "[t]o protect and support the economy of the Columbia River Gorge by encouraging growth to occur in existing urban areas and by allowing future economic development in a manner that is consistent with [the Act's resource protections]."

The later purpose is getting lost in the Commission's current work to amend the Management Plan. The Commission, for the past years, has dismissed the importance of urban areas in the Gorge and the role urban areas play in the Gorge's economy. Now, the Commission proposed revisions to the Management Plan's economic development chapter and the chapter addressing the Commission's role in urban area boundary revisions that reflect together what appears to be a new "no growth" policy agenda. This is not consistent with the Act.

Currently, the Commission is proposing language that would effectively prevent urban areas on both sides of the river from expanding their respective urban boundaries to accommodate growth even if such expansions would be permissible under each state's respective rules. The drafters appear to be intentionally structuring the review requirements to make it virtually impossible for any urban area boundary expansion to receive approval. That coupled with the revisions to the economic development chapter, undermining the role of ports and urban areas in the Gorge's economy further reflect the Commission's intention to pursue an agenda that is inconsistent with the original intent of the Act. Each signatory to this letter believes in responsible, sustainable economic development and growth. Growth does not mean sprawl, which we all agree is unwanted. We strongly believe, however, that urban areas should continue to have the opportunity to grow, should there be a demonstrated need and if such growth can be done consistent with the resource protection purpose of the Act. What the Commission proposes to do is preclude such an opportunity.

We respectfully request that the Governor support us in requesting that the Commission pause its work on the amendments to urban area boundary policies to allow for more meaningful public and stakeholder input. We also believe that additional time is needed to conduct outreach to state agencies on both sides of the river to refine the coordination efforts described in the proposed amendments. The Commission is proposing to adopt new policies that will have significant and permanent ramifications on the future of the Gorge and the ability of urban areas to accommodate future economic growth opportunities. The proposed policies could also prevent Oregon Gorge communities like the City of The Dalles from meeting its 20-year land supply for housing, employment, and industry under Oregon's own comprehensive land use planning rules.

Each signatory below has been an active participant in the Commission's amendment process. We recognize the importance of the plan updates, but caution that rushing significant policy changes on urban area boundary revisions will have permanent and significant ramifications on Gorge communities. The Commission is already late on conducting its 10-year review of the Management Plan. Removing the Urban Area Boundary Revisions from the Commission's current plan amendment process (and take it up later) would allow the Commission to move forward with the majority of the plan amendments without jeopardizing our communities' ability to consider future sustainable growth opportunities like all other Oregon communities outside of the Gorge.

Thank you for your consideration.

Very truly yours,

Jessica Metta Executive Director Mid-Columbia Economic Development District



Mayor Rich Mays City of The Dalles



Chair Scott Hege Wasco County



Andrea Klaas Executive Director Port of The Dalles

