



**TO: Columbia River Gorge Commission**  
**FROM: Friends of the Columbia Gorge**  
**RE: Friends' comments on the Economic Development Draft Revisions**  
**DATE: June 30, 2020**

Thank you for the opportunity to comment on the draft revisions for Economic Development chapter of the Management Plan dated April 23, 2020. Friends of the Columbia Gorge (Friends) is a nonprofit conservation organization with approximately 6,500 members dedicated to the protection and enhancement of the scenic, natural, cultural and recreation resources of the Columbia River Gorge area. Friends supports livable, well-planned communities within the National Scenic Area.

### **GMA Policies**

- 1. GMA Policy 3., Page 390. 23.** The Gorge Commission shall support the economic development efforts of the ~~S~~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.**~~economic development plans established under the Scenic Area Act.~~ The Gorge Commission recognizes and supports the importance of the economic vitality efforts of regional and community organizations and the four Columbia River treaty fishing tribes pursuant to their economic development strategic plans and as consistent with the purposes and standards of the National Scenic Area Act and the Management Plan.

**Comment:** 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.

**Friends' recommendation:** (Staff draft revisions in red. Friends recommended text in bold blue.)

- 23.** The Gorge Commission ~~shall~~ **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 its Management Plan.**~~economic development plans established under the National Scenic Area Act.~~ The

Gorge Commission recognizes and supports the importance of the economic vitality efforts of regional and community organizations and the four treaty tribes, pursuant to their economic development strategic plans and as consistent with the purposes and standards of the Act and the Management Plan.

**2. GMA Policy 4, Page 390-391.** Agriculture and forest industries in the Columbia River Gorge shall be protected and supported by:

- preventing fragmentation of the land base ~~and by~~;
- minimizing interference with agricultural and forest practices from conflicting uses;
- ~~enhancing agricultural lands for agricultural uses, forest lands for forest uses and forest lands for agricultural uses;~~
- ~~being consistent with the strategies listed in the Economic Vitality Plan to provide ongoing support for these uses;~~
- ~~encouraging conservation efforts such as renewable energy and water efficiency; and~~
- ~~allowing commercial uses on GMA agriculture lands that are incidental and subordinate to the agricultural use.~~

**Comment:** 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.

**Friends' recommendation:** (Friends recommended text in bold blue.)

- ~~allowing commercial uses on GMA agriculture lands that are incidental and subordinate to the agricultural use.~~

**3. GMA Policy 5. Page 391.** 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.

5. The economic vitality of the Gorge economy shall be enhanced by encouraging growth to occur **within the existing boundaries** of the ~~in~~ Urban Areas **in the National Scenic Area**.

**4. GMA Policy 6. Page 391.** The following commercial uses may be allowed outside Urban Areas:

F. Commercial events in all GMA designations except Open Space and Agriculture Special, in conjunction with a lawful ~~winery~~, wine sales/or tasting room, ~~bed and breakfast inn~~, commercial use, or dwelling listed in the National Register of Historic Places.

**Comment:** 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.

**Friends’ recommendation:** (Bold blue strikethrough.)

6. The following commercial uses may be allowed outside Urban Areas:

**F. Commercial events in all GMA designations except Open Space and Agriculture Special, in conjunction with a lawful winery, wine sales/tasting room, bed and breakfast inn overnight accommodation, ~~commercial use~~ or dwelling listed in the National Register of Historic Places.**

Friends supports the draft revisions to policies 7 through 11.