



FRIENDS OF THE COLUMBIA GORGE

December 7, 2011

Wasco County Board of County Commissioners
c/o Wasco County Department of Planning and Economic Development
2705 East Second Street
The Dalles, Oregon 97058

Re: Wasco County's proposed Comprehensive Plan Amendments and Energy Ordinance Updates.

Dear Commissioners:

Friends of the Columbia Gorge (Friends) has reviewed and would like to comment on the proposed amendments to the Comprehensive Plan. Friends is a non-profit organization with approximately 5,000 members dedicated to protecting and enhancing the resources of the Columbia River Gorge. Our membership includes hundreds of citizens who reside within the Columbia River Gorge National Scenic Area. Friends previously submitted comments on May 3, 2011.

Friends supports appropriately sited renewable energy development and rules that ensure that energy facilities are sited to avoid adverse impacts to communities and the environment. Friends provides the following comments and recommendations for the proposed revisions to the Comprehensive Plan.

Friends encourages the County to adopt Comprehensive Plan provisions that protect the scenic, natural, recreational, and cultural resources of the Columbia River Gorge National Scenic Area, the Deschutes Wild and Scenic River, the White River Scenic Waterway, and the John Day Wild and Scenic River. The County should adopt clear and consistent policies identifying the importance of protecting these important visual corridors.

The Draft Comprehensive Plan provides divergent and conflicting findings and polices for the important scenic landscapes within the County. The "Findings and Inventories" section of the Draft Comprehensive Plan identified not just the formally designated John Day Wild and Scenic River Area as important, but all "Land seen from the river within the river canyon." Draft Comprehensive Plan at page 8-5 (Chapter 8 § B(2)(b)(5)). For the Deschutes River the Draft Comprehensive Plan focuses on the "area within the river canyon that can be seen from the Deschutes River." Draft Comprehensive Plan at page 8-5 (Chapter 8 § B(2)(b)(5)). For the

Columbia River Gorge the Draft Comprehensive Plan does not address all land seen from the Columbia River, but instead focuses exclusively on the area within the National Scenic Area. Draft Comprehensive Plan at page 8-3. The County should revise each of these sections to consistently state that important scenic landscapes include all land seen from the respective rivers.

The goals and policies for the Deschutes and John Day Rivers state that the County will “[a]llow only buildings customarily provided in conjunction with farm use within the visual corridors of the Deschutes and John Day Wild & Scenic Rivers . . .” Draft Comprehensive Plan at 8-2 (Chapter 8 § B(1)(b)(3)). As written, this identifies the importance of protecting the views of all visual corridors as seen from the rivers from adverse impacts of development. The Draft Comprehensive Plan also prohibits new mineral and aggregate development within 1/4 mile of the boundaries for the John Day and Deschutes Wild and Scenic Rivers. Draft Comprehensive Plan at page 8-2 (Chapter 8 § B(1)(b)(5)). The Draft Comprehensive Plan does not extend these same policies to the Columbia River Gorge.

Friends recommends revising the Comprehensive Plan to provide uniform goals and policies for the protection of all important scenic “visual corridors” within the County. This should include identifying the views from the Columbia River as well the views from wild and scenic rivers. The following underlined and ~~strikethrough~~ revisions should be made in Draft Comprehensive Plan:

Chapter 8 § B(2)(a)(2):

Columbia Gorge: ~~The Columbia Gorge, (as defined by Oregon Revised Statutes 390.460),~~ includes the land seen from the Columbia River. The Columbia River Gorge is being protected from conflicting uses by the implementation of the Wasco County National Scenic Area Land Use and Development Ordinance which is consistent with the Management Plan for the Columbia River Gorge National Scenic Area and other applicable laws and land use regulations.

Draft Comprehensive Plan at page 8-5. Friends also recommends that the County adopt policies that discourage incompatible land uses or development “within the visual corridors” of the Columbia River. Friends recommends the following underlined revisions, which implement the protections already provided for the John Day and Deschutes Wild and Scenic Rivers:

Chapter 8 § B(1)(a).

(1) Scenic and Open Space areas in the Columbia River Gorge will be preserved by implementation of the Wasco County National Scenic Area Land Use and Development Ordinance which is consistent with the Management Plan for the Columbia River Gorge National Scenic Area and other applicable laws and land use regulations.

(2) Allow only buildings customarily provided in conjunction with farm use within the visual corridors of the Columbia River not within Urban Areas.

(3) Encourage the preservation of landscape features of the Columbia River Gorge.

(4) Unless screened from view from the Columbia River, new mineral and aggregate sites shall not be allowed within the quarter mile boundary of the Columbia River Gorge National Scenic Area, pursuant to Policy 3 in Section E, Mineral Resources, below.

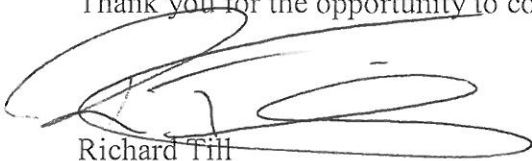
Draft Comprehensive Plan at page 8-2. The referenced provision in the Mineral Resources section of the Comprehensive Plan would also need to be revised at page 8-49:

Chapter 8, § F(1)(c).

New mineral and aggregate sites shall not be allowed within the quarter mile boundary of either the John Day, or Deschutes Rivers, or Columbia River Gorge National Scenic Area, unless the site is screened from views from the River.

Friends encourages the County to adopt these revisions to ensure that the County's Comprehensive Plan provides clear and consistent policies and goals for the protection of important scenic landscape within its jurisdiction.

Thank you for the opportunity to comment.

A handwritten signature in black ink, appearing to read 'Richard Till', is written over a horizontal line.

Richard Till
Conservation Legal Advocate

