



December 10, 2007

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

Dear Commissioners:

Subject: Comments on the Proposed Amendment to the Management Plan for the Columbia River Gorge National Scenic Area: *Proposed Recreation Resort Plan Amendment PA-06-01*

Thank you for the opportunity to comment on the Proposed Recreation Resort Plan Amendment PA-06-01 to the Management Plan for the Columbia River Gorge National Scenic Area. Futurewise is a Washington non-profit citizen group. Our mission at Futurewise is to promote healthy communities and cities while protecting working farms and forests and shorelines for this and future generations. Futurewise has members throughout Washington State including the Columbia River Gorge.

We recommend that the Columbia River Gorge Commission reject the proposed amendment for two reasons. First, mid-sized and large resorts should be directed into the urban growth areas in the Columbia River Gorge. This will help achieve one of the purposes of the Columbia River Gorge National Scenic Area Act which is “to protect and support the economy of the Columbia River Gorge area by encouraging growth to occur in existing urban areas” (§544a). The SE Group’s *Hospitality Industry Impact* analysis for the Broughton Lumber Company shows that a new resort has the potential to adversely affect existing lodging businesses by increasing competition for guests in a market where occupancy rates remain low and seasonal. Allowing additional resorts outside existing urban areas may actually harm rather than protect the gorge’s economy. This is contrary to the purposes of the Columbia River Gorge National Scenic Area Act.

Second, the proposed amendment does not meet the criteria for management plan amendments in Commission rule 350-50-030. Commission rule 350-50-030(1) requires a significant change in conditions. There have not been any significant changes in conditions in the scenic area related to the properties that will be affected by the proposed amendment. Physical changes have not been identified. There is no new information regarding land uses or resources that could result in a change to the plan. There are no changes in legal, social, or welfare conditions not anticipated in the plan. There has also not been any demonstration of a mistake in the Management Plan. These are the types of changes that

Commission rule 350-50-030(1) requires to justify an amendment to the Management Plan. This criterion has not been met.

Commission rule 350-50-030(2) requires that the amendment must be consistent with the purposes and standards of the Columbia River Gorge National Scenic Area Act. As we saw above, the proposed amendment has the potential to harm existing lodging businesses in urban growth areas and the gorge generally. To allow significant urban style growth outside urban growth areas is contrary to one of the purposes of the Columbia River Gorge National Scenic Area Act. So this criterion is not met.

Commission rule 350-50-030(3) requires that no practicable alternative to the proposed amendment more consistent with the Columbia River Gorge National Scenic Area Act exist. The principal beneficiary of the amendment is the Broughton Lumber Company. The company's mill site already has opportunities for development. The SE Group's *Hospitality Industry Impact* analysis shows an additional resort is not needed at this time. The proposed amendment does not meet this criterion. Practicable alternatives more consistent with the plan exist.

Thank you for considering our comments. If you require additional information please contact me at telephone 206-343-0681 or e-mail tim@futurewise.org

Sincerely,

A handwritten signature in blue ink, consisting of two large, stylized, overlapping loops that resemble the letters 'S' and 'T'.

Tim Trohimovich, AICP
Planning Director

cc: Honorable Patty Murray, United States Senate
Honorable Maria Cantwell, United States Senate
Honorable Brian Baird, United States House of Representatives