



FRIENDS OF THE COLUMBIA GORGE

Via email

February 5, 2018

Adam Barber, Senior Planner
Multnomah County Land Use Planning Office
1600 SE 190th Ave.
Portland, Oregon 97233
Via email to adam.t.barber@multco.us

Re: Updates to the Multnomah County Code in the Columbia River Gorge National Scenic Area – PC-2013-3021

Dear Mr. Barber:

Friends of the Columbia Gorge (“Friends”) is a non-profit organization with approximately 9,000 members dedicated to protecting and enhancing the resources of the Columbia River Gorge National Scenic Area. Our membership includes hundreds of citizens who reside in the six counties within the Columbia River Gorge National Scenic Area.

Friends has reviewed the proposed changes to the Multnomah County Code (“MCC”) and submits these comments. Please accept these comments on the above-mentioned legislative action, provide them to the Planning Commission, and recognize Friends as a party to this matter.

In general, Friends supports the proposed changes to the MCC to conform to the amended Management Plan for the Columbia River Gorge National Scenic Area. However, Friends recommends a change to provide greater clarity in the MCC.

Due to its placement within the MCC, the proposed addition at MCC § 38.7075(G)(4) is too narrow in scope and is not adequately protective of wetlands, streams, lakes, and riparian areas. That language is proposed to be placed only in the review criteria for disturbing buffer zones. The Management Plan language applies to any changes that would negatively affect the aforementioned aquatic resources whether or not they are within buffer zones. One possible way to fix this would be to move the

proposed addition at MCC § 38.7075(G)(4) up to the end of the first paragraph of MCC § 38.7075¹ to match the applicability of that provision in the revised Management Plan.

Friends requests that the Planning Commission make the modifications to the proposal as discussed above.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to be 'S. McCoy', with a stylized, cursive-like flourish.

Steven D. McCoy
Staff Attorney

¹ I.e. before MCC § 38.7075(A).