



## 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 § 38.7075<sup>1</sup> 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 read "S. McCoy", with a stylized flourish at the end.

Steven D. McCoy  
Staff Attorney

---

<sup>1</sup> I.e. before MCC § 38.7075(A).