Attachment C.1



FRIENDS OF THE COLUMBIA GORGE

Via email

November 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-2016-5384

Dear Mr. Barber:

Friends of the Columbia Gorge ("Friends") is a non-profit organization with approximately 8,000 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 MCC Chapter 38 to account for geologic hazards. However, many of the definitions in the proposed MCC § 38.5503 duplicate definitions that already exist in MCC § 38.0015. The specific definitions that exist in both MCC § 38.0015 and in the proposed MCC § 38.5503 are Best Management Practices, Cut, Development, Fill, Ordinary High Water Mark, and Stream. In some instances, the definitions are markedly different from each other and would likely result in confusion for the public. The definitions in MCC § 38.0015 comport with the Management Plan for the Columbia River Gorge National Scenic Area as required by law while some of the new definitions do not. Friends recommends striking the duplicative definitions in MCC § 38.5503.

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

Thank you for considering our comments.

Sincerely,

Y

Steven D. McCoy Staff Attorney