

7/8/2025

Dear Columbia River Gorge National Scenic Area Commissioners,

The Columbia River Gorge National Scenic Area carefully balances aesthetic preservation and access management. Careful oversight of overnight accommodations on private property is essential for safeguarding the Gorge's scenic nature, economic health, and recreation opportunities.

Accessing the scenic beauty of the Gorge is different for each visitor. Short-term vacation rentals offer a unique experience that hotels, motels, and resorts cannot. Gathering in a home with your loved ones is a fundamentally special experience. Allowing families and friends from across the country to celebrate and gather, is a worthwhile endeavor. For some with mobility differences access to the scenic area is complex. For families with small children and/or pets a home like environment is pivotal. Recreation is different for each person, sometimes the type of accommodation is the way they access recreation in the Gorge.

Budgets are the economic backbone for management of the scenic area; taxes and fees generated from overnight accommodations on private property could become a revenue stream that strengthens the area budgets. Our home alone generated \$9,086 during 2022 in state and local taxes. Additional funds specifically for the Columbia River Gorge National Scenic Area could be generated if a usage fee was imposed, one rental paying a \$10 nightly fee for 183 nights would generate \$1,830 in revenue.

Responsible and thoughtfully regulated overnight accommodations on private property could provide essential access while increasing funding, and balancing housing needs. Please consider revising the rules to allow overnight accommodations across more land designation types. Below you will find our ideas on the revisions that could be supportive.

Summary of Amendment Ideas For Skamania County Code Title 22.12.140:

22.12.140 A. Open the land designations where overnight accommodations may be permitted. Streamlining overnight accommodations amongst all land designations will simplify oversight and compliance for all non commercial bed and breakfasts and short term rental types. This will ensure that the urban centers are not oversaturated with short-term rentals which have been negatively affecting affordable housing and the community dynamics in urban centers.

22.12.140 A.1. Include language about private ownership. Requiring that dwelling units are privately owned will ensure that corporations and LLCs are not acquiring properties for a short term rental portfolio and negatively affecting local housing affordably. Having properties privately owned also ensures that some ties to the greater community are planned or already exist.

22.12.140 A.3. Increase the number of rental nights. Increasing the nights per year will contribute to the financial stability and feasibility of ownership for individuals who are retired and spend part of the year elsewhere or individuals who own a second home.

22.12.140 A.7. Remove the employee limit. Limiting the number of professionals a property owner employs negatively affects the owners ability to maintain their property. Responsible management of properties should be prioritized. Allowing owners to employ skilled workers who responsibly maintain a property's condition, accessibility, sanitation, and safety should not be discouraged. Property owners do not always have the physical ability or skill level to perform all property related tasks.

22.12.140 D. Include a nightly usage fee to benefit the Scenic Area. Establishing a nightly fee will ensure another revenue source for the protection of the unique scenic beauty of the Gorge and the commission, the steward of the Gorge.

This is a continuation of our letter dated June 9, 2025 (also attached), and subsequent correspondence.

Gratefully,
Theresa and Mark Mugerditchian

7/8/2025

22.12.140 OVERNIGHT ACCOMMODATIONS Proposed revisions - **Additions**, ~~Deletions~~, *(Comments)*

A. Overnight accommodations may be allowed where authorized in **all specified** *(Streamlining overnight accommodations amongst all land designations will simplify oversight and compliance for all non commercial Bed and breakfasts and short term rental types. This will ensure that the urban centers are not oversaturated with short-term rentals which have been negatively affecting affordable housing and the community dynamics in urban centers.)* land use designations and consistent with the following requirements:

1. Overnight accommodations may only be located within a **privately owned** *(Requiring that residents are privately owned will ensure that corporations and LLCs are not acquiring properties for a short term rental portfolio and negatively affecting local housing affordably. Having properties privately owned also ensures that some ties to the greater community are planned or already exist.)* building used as a single-family dwelling. Either the entire dwelling or a portion of the dwelling may be rented. The dwelling must be the permanent residence of the owner.

2. The use shall be incidental and subordinate to the primary use of the property. *(No changes proposed)*

3. The owner of the subject parcel may rent the dwelling for up to **183** ~~ninety 90~~ *(Increasing the nights per year will contribute to the financial stability and feasibility of ownership for individuals who are retired and spend part of the year elsewhere or individuals who own a second home.)* room nights per year.

4. Dedicated on-site parking shall be provided to accommodate all guests. Parking areas shall be screened so they are not visible from key viewing areas. *(No changes proposed)*

5. Overnight accommodations shall be operated in a way that will prevent disturbances to neighboring properties not typical of a residential neighborhood, including but not limited to loud music, loud noises, excessive traffic, loud and uncontrolled parties, junk/debris/garbage accumulation in the yards, trespassing, barking dogs, or excess vehicles, boats or recreational vehicles parked in the streets in front of the unit. The rental shall not be used at any time to host commercial events. *(No changes proposed)*

6. Functioning carbon monoxide detectors and smoke detectors shall be kept in operating order and installed as required by the International Residential Code (IRC). At least one functioning fire extinguisher shall be installed within the dwelling unit. *(No changes proposed)*

~~7. The overnight accommodation may employ up to three employees other than the residents of the dwelling.~~ *(Limiting the number of employees a property owner can have has a negative effect on the owners ability to maintain their property. Responsible management of properties should be prioritized. Allowing owners to employ skilled workers who responsibly maintain a property's condition, accessibility, sanitation, and safety should not be discouraged. Property owners do not always have the physical ability or skill level to perform property maintenance.)*

B. Pursuant to RCW 64.37, owners must maintain primary liability insurance to cover the dwelling in the aggregate of not less than one million dollars and shall remit all applicable local, state, and federal taxes. *(No changes proposed)*

C. Approvals for overnight accommodations shall... in the dwelling. *(No changes proposed)*

D. A nightly recreation fee of _____ will be remitted to the National Scenic Area Gorge

Commission. *(Establishing a nightly fee that benefits the Gorge Commission will ensure another revenue source for the protection of the unique scenic beauty of the Gorge and the commission, the steward of the Gorge.)*