

Director's Decision

Summary of Application

FILE NUMBER:	C25-0001
PROPOSAL:	The Columbia River Gorge Commission has received an application for an after-the-fact review of a low-intensity campground.
APPLICANTS:	Christopher Kroeskop
LANDOWNERS:	Ron & Carol Kroeskop
SIZE and LOCATION:	The subject property is located at 323 Old Highway 8, and is described as Tax Lot Number 03-12-2900-000/600 in the western half of Section 29, Township 3 North, Range 12 East, Willamette Meridian, Klickitat County, Washington. The property is located on a parcel that is approximately 80 acres in size and is associated with these additional Tax Lot Numbers: 03-12-2900-001/700 and 03-12-2900-001/800.
LAND USE DESIGNATION:	General Management Area (GMA) – Small-Scale Agriculture (80)

Decision

Based upon the findings of fact and conclusions of law in the staff report accompanying this decision and the conditions of approval in this decision document, the land use application by Christopher Kroeskop for the after-the-fact review of a low-intensity campground is consistent with Commission Rules chapter 350, division 082, and thus consistent with the *Management Plan for the Columbia River Gorge National Scenic Area* and the standards of Section 6 and the purposes of the Columbia River Gorge National Scenic Area Act, Pub. L. 99-663, 100 Stat. 4274 (1986), and is hereby **APPROVED**.

Conditions of Approval

The following conditions of approval are given to ensure that the subject request is consistent with Commission Rules chapter 350, division 082. Compliance with these conditions of approval is required. The Gorge Commission may take one or more enforcement actions at any time to ensure compliance with these conditions of approval.

1. In accordance with Commission Rule 350-082-0150(3), the applicant shall record the Executive Director's decision and conditions of approval and approved site plan and

elevation drawings in county deeds and records (at the Klickitat County Auditor's Office) to ensure notice of the conditions to successors in interest. The record shall be associated with all tax lots and parcels that constitute the subject property. The applicant need not record the separate staff report document containing the relevant findings and conclusions. Once recorded, the applicant shall submit a copy of the recorded documents to the Executive Director.

2. This decision does not exempt the proposal from other non-National Scenic Area rules and regulations. It is the applicant's responsibility to ensure the use complies with all other applicable federal, state, and county laws and to obtain necessary approvals, including utility easement approvals.
3. A post-completion inspection is required. Please contact the Gorge Commission office when all construction is complete to schedule this inspection. The applicant may request interim inspections and Gorge Commission staff may at its discretion conduct interim inspections.
4. Any new land uses or structural development, alterations, or grading not included in the approved application and site plan require a new application and review.
5. The developments shall be constructed as shown on the approved application and site plan. The campground shall be two self-contained sites with no utility hook-ups.
6. Except for trees identified in the site plan, dead trees or other dead vegetation that may pose a hazard, all existing mature vegetation on the parcel shall be retained and maintained for screening purposes.
7. To ensure the integrity of Oregon white oak habitat, no development shall be allowed within the dripline of any Oregon white oaks.
8. The applicant shall sign a declaration and record it with the county deeds and records stating they are aware that operators are entitled to carry on accepted farm practices on lands designated Large-Scale Agriculture or Small-Scale Agriculture.
9. An archaeologist monitor shall be present for any ground disturbing activities and for maintaining the identified cultural resource buffer zone during development.
10. If cultural resources are discovered, all activities within 100 feet of the cultural resources shall immediately cease and the applicants shall notify the Gorge Commission within 24 hours of discovery and the State Physical Anthropologist, Dr. Guy Tasa at (360) 586-3534 or guy.tasa@dahp.wa.gov. The cultural resources shall remain as found and further disturbance is prohibited until permission is granted by the Executive Director of the Gorge Commission.
11. If human remains are discovered, all activities shall cease immediately upon their discovery. Local law enforcement, the Executive Director and Indian Tribal governments shall be contacted immediately. Further disturbance is prohibited until permission is granted by the Executive Director of the Gorge Commission.

DATED THIS 12 day of March 2026 at White Salmon, Washington.

Krystyna U. Wolniakowski

Krystyna U. Wolniakowski
Executive Director

Expiration of Approval

Commission Rule 350-082-0160 governs the expiration of this Director's Decision.

Expiration of this Director's Decision is automatic. The Executive Director does not notify applicants or landowners of decisions that are expired or may be close to expiring.

This decision of the Executive Director becomes void on the 12 day of March 2028 unless construction has commenced in accordance with Commission Rule 350-082-0160(4).

Commission Rule 350-082-0160(4) specifies that commencement of construction means actual construction of the foundation or frame of the approved structure.

Construction must be completed within two years of the date the applicant commenced construction. Commission Rule 350-082-0160(5) specifies that completion of the structure means completion of the exterior surface(s) of the structure and compliance with all conditions of approval in the National Scenic Area approval.

Once the applicant has commenced construction of one element in this decision, the applicant must complete all elements in this decision in accordance with Commission Rule 350-082-0160. The Gorge Commission does not use different commencement of construction dates for different elements in this decision.

The applicant may request one 12-month extension of the time period to commence construction and one 12-month extension to complete construction in accordance with Commission Rule 350-082-0160(6). The applicant must submit the request in writing prior to the expiration of the approval. If the applicant requests an extension of time to complete construction after commencing construction, the applicant shall specify the date construction commenced. The Executive Director may grant an extension upon determining that conditions, for which the applicant is not responsible, would prevent the applicant from commencing or completing the proposed development within the applicable time limitation. The Executive Director shall not grant an extension if the site characteristics or new information indicate that the proposed use may adversely affect the scenic, cultural, natural or recreation resources in the National Scenic Area.

Appeal Process

The appeal period ends on the 11 day of April 2026.

The decision of the Executive Director is final unless the applicant or any other person who submitted comment files a Notice of Appeal with the Commission within thirty (30) days of

the date of this decision. Commission Rule chapter 350, division 70 governs appeal of this decision. This rule is available on the Gorge Commission's [website](#) and at the Gorge Commission office. You may contact the Gorge Commission office if you have questions about appealing this decision.

Notes

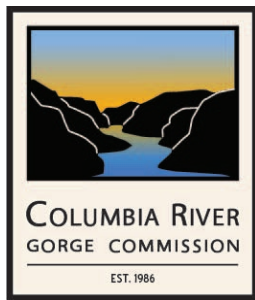
1. Any new land uses or structural development such as driveways, parking areas, garages, workshops, fences or other accessory structures; or additions or alterations not included in the approved application or site plan will require a new application and review. New cultivation also requires a new application and review.
2. This decision does not address local, state, or federal requirements that may be applicable to the proposed development. The landowner is responsible for obtaining all applicable county, state, or federal permits required for the development.

In accordance with Commission Rule 350-082-0150(6), the Gorge Commission staff mailed notice of this decision to the following governments, agencies, and organizations and persons who provided comment on the application:

Confederated Tribes and Bands of the Yakama Nation
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of Warm Springs Reservation of Oregon
Nez Perce Tribe
U.S. Forest Service National Scenic Area Office
Washington Department of Archaeology and Historic Preservation
Klickitat County Planning Department
Klickitat County Building Department
Klickitat County Public Works Department
Klickitat County Health Department
Klickitat County Assessor
Washington Natural Heritage Program
Washington Department of Fish and Wildlife
Steve McCoy, Friends of the Columbia Gorge

Attachments:

Staff Report for C25-0001
Approved site plans



Development Review Staff Report

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LAND USE DESIGNATION:	General Management Area (GMA) – Small-Scale Agriculture (80)

Notice of Application Mailed to:

In accordance with Commission Rule 350-082-0110, the Gorge Commission staff mailed notice of this application to property owners within 200 feet of the subject parcel and sent email notice of this application to the following governments, agencies, and organizations:

Confederated Tribes and Bands of the Yakama Nation
Confederated Tribes of the Umatilla Indian Reservation
Confederated Tribes of Warm Springs
Nez Perce Tribe
U.S. Forest Service National Scenic Area Office (USFS CRGNSA)
Washington Department of Archaeology and Historic Preservation (DAHP)
Klickitat County Planning Department
Klickitat County Building Department
Klickitat County Public Works Department
Klickitat County Health Department
Klickitat County Assessor
Skamania County
Washington Natural Heritage Program

Written Comments Received From:

Friends of the Columbia Gorge (Steve McCoy, Staff Attorney)
USFS CRGNSA (Luciano Legnini, Archaeologist)
Confederated Tribes of the Warm Springs Reservation of Oregon (David E. Witt, Review & Compliance Specialist Coordinator)
Confederated Tribes and Bands of the Yakama Nation (Aulena Carl, Archaeology Technician Cultural Specialist)
Washington State Department of Archaeology and Historic Preservation (Jessica Stone, Assistant State Archaeologist)

Findings of Fact

A. Land Use

1. Christopher Kroeskop proposes to establish a low-intensity campground consisting of two self-contained campsites and adjacent parking spaces. Each campsite is approximately 1,000 square feet in area, including the adjacent parking space. No additional infrastructure was proposed in the application.
2. The subject parcel is in the General Management Area (GMA) and is designated Small-Scale Agriculture with an 80-acre minimum parcel size. The parcel is approximately 80 acres in size and is located off Old Highway 8. The tax lot associated with this proposal is approximately 30 acres in size and part of the larger 80-acre parcel associated with two other tax lots.
3. According to Klickitat County Assessor's records existing development on the property includes a 24 ft x 60 ft (1,440 square feet) agricultural building built in 1920, a 10 ft x 20 ft (200 square feet) structure and a 10ft x 10ft (100 square feet) utility shed constructed in 2001. Gorge Commission records indicate an application for a 7.5 ft x 30 ft (225 square feet) recreational vehicle that was approved in 2005. A 3,712 square foot replacement single-family dwelling and 1,008 square foot detached garage is approved under Director's Decision C24-0009.

This Director's Decision does not in any way validate any or resolve other pending violations on the larger subject parcel.

4. Commission Rule 350-082-0240(4)(J) allows recreation development on lands designated Small-Scale Agriculture, subject to the "Approval Criteria for Specified Review Uses" 350-082-0240(4)(b) (this is discussed in Finding A.5), and the Recreation Intensity Class provisions in 350-082-0700 through 350-082-0720.

Only resource-based recreation uses of very low-intensity [CR 350-082-0700(1) Recreation Intensity Class 1] and low-intensity nature [CR 350-082-0700(2) Recreation

Intensity Class 2], occurring infrequently in the landscape, are compatible with the Pastoral landscape setting. The proposed campground is a recreational development and is located in Recreation Intensity Class 3 at the southern end of property (see Figure 1). As discussed in Finding B.10 & E.1, because the development is in the Pastoral landscape setting, this proposal will be reviewed under the guidelines for Recreation Intensity Class 2.

5. Commission Rule 350-082-0240(4)(b) discusses approval criteria for specified review uses on lands designated Large-Scale Agriculture and Small-Scale Agriculture:

(A) The use is compatible with agricultural uses and would not force a change in or significantly increase the cost of accepted agricultural practices on nearby lands devoted to agricultural use.

(B) The use will be sited to minimize the loss of land suitable for the production of crops or livestock.

Current agricultural uses on the subject property consist of the growing of vegetables and the raising of livestock. Agricultural use of the land has been concentrated in areas of the subject property that are in open fields and large openings between stands of oak.

The proposed site of the campground is located along the southern boundary of the property in a stand of mature oak trees and in close proximity to Old Highway 8. According to Gorge Commission GIS maps and the USA Soils Farmland Classification, the proposed site is located in an area of the subject parcel that is designated as “Not Prime Farmland.”

Additionally, the closest agricultural uses on nearby lands are the growing of grapes on the parcels located to the northeast and southeast of the subject parcel; both being over 350 feet from the proposed campground site. The campground consists of two campsites which will be seasonally active during the spring, summer, and fall months. Because the proposed campground does not have any physical infrastructure associated with its use, the site can be used for livestock during the times of year when the campground is not in use. Due to the low-impact and low-traffic nature of the campground, staff determined the proposed use would not significantly increase the cost of agricultural practices on nearby lands. All these factors contribute to the proposed site being located in an area of the subject parcel to minimize the loss of suitable land and impact on neighboring agricultural uses.

Land Use Conclusion:

The proposed developments are allowed review uses, subject to Commission Rules 350-082-0600 through 350-082-0720 that protect scenic, cultural, natural, and recreation resources.

B. Scenic Resources

1. Commission Rule 350-082-0600(1)(a) states:

New development shall be sited and designed to retain the existing topography and to minimize grading activities to the maximum extent practicable.

The proposed campground is located on a site with less than 10 feet of elevation change (see Figure 1). Staff observed on a site visit on June 11, 2025, that the site is relatively level and no grading is proposed. No new excavation is required to site the two campground sites.

2. Commission Rule 350-082-0600(1)(b) states:

New buildings and expansion of existing development shall be compatible with the general scale of existing nearby development. New buildings that are 1,500 square feet or less are exempt from this guideline. Findings addressing this guideline shall include, but are not limited to:

(A) Application of the landscape setting design guidelines, if applicable.

(B) A defined study area surrounding the development that includes at least ten existing buildings, not including existing buildings within the urban areas or outside the National Scenic Area.

(C) Individual evaluations of scale for each separate proposed building in the application and each separate building in the study area, including:

(i) All finished above ground square footage;

(ii) Total area of covered decks and porches;

(iii) Attached garages;

(iv) Daylight basements;

(v) Breezeways, if the breezeway shares a wall with an adjacent building; and

(vi) Dimensions, based on information from the application or in the Assessor's records.

(D) An overall evaluation demonstrating the compatibility of proposed development with surrounding existing development and development approved but not yet constructed. Buildings in the vicinity of the proposed development that are significantly larger in size than the rest of the buildings in the study area should be removed from this evaluation.

No new buildings or expansion of existing development are proposed. The campground sites are dry sites consisting of one parking space for each site with no additional infrastructure required.

3. Commission Rule 350-082-0600(1)(c) states:

Landowners shall be responsible for the proper maintenance and survival of any planted vegetation required by 350-082-0600.

No landscaping is required. The applicant is required to revegetate disturbed areas with grasses from the Recommended Seed Mixes for East Side Environments handout (attached to this report) immediately following the completion of the project (or as soon as possible thereafter if the project is completed during the winter or summer months).

4. Commission Rule 350-082-0600(2) discusses review uses related to Key Viewing Areas.

- (a) Each development shall be visually subordinate to its landscape setting as visible from key viewing areas. New development shall be sited to achieve visual subordination from key viewing areas, unless siting would place such development in a buffer specified for protection of wetlands, riparian corridors, rare plants, or sensitive wildlife sites or would conflict with guidelines to protect cultural resources. In such situations, new development siting shall comply with this guideline to the maximum extent practicable.*
- (b) Determination of potential visual effects and compliance with visual subordination standard in subsection (a) above shall include consideration of the cumulative effects of proposed development. A determination of the potential visual impact of a new development shall include written findings addressing the following factors:*
- (A) The amount of area of the building site exposed to key viewing areas;*
 - (B) The degree of existing vegetation providing screening;*
 - (C) The distance from the building site to the key viewing areas from which it is visible;*
 - (D) The number of key viewing areas from which it is visible;*
 - (E) The linear distance along the key viewing areas from which the building site is visible (for linear key viewing areas, such as roads); and*
 - (F) Other factors the reviewing agency determines relevant in consideration of the potential visual impact.*
- (c) The extent and type of conditions applied to a proposed development to achieve visual subordination to its landscape setting shall be proportionate to its potential visual impacts as visible from key viewing areas. Conditions may include, and shall be applied using the following order of priority, with (A) being the first condition to require and (F) being the last condition to require if the prior conditions do not achieve visual subordination:*
- (A) Screening by existing topography.*
 - (B) Siting (location of development on the subject property, building orientation, and other elements).*
 - (C) Retention of existing vegetation on the applicant's property.*
 - (D) Design and building materials (color, reflectivity, size, shape, height, architectural and design details and other elements).*
 - (E) New landscaping on the applicant's property.*
 - (F) New berms or other recontouring on the applicant's property, where consistent with other applicable provisions.*

The proposed campsites are located to the north and east of a grove of oak and pine trees so that the campsites are screened to the west by the grove of oak and pine trees and to the east by undulating topography.

According to Gorge Commission GIS maps, the proposed development site is topographically visible from the following key viewing areas:

Key Viewing Area (KVA)	Distance Zone		
	Foreground	Middle ground	Background
	0 -1/4 mile	1/4 – 4 miles	Over 4 miles
Historic Columbia River Highway		X	
Rowena Plateau		X	
Interstate 84		X	

Staff completed a Key Viewing Area analysis prior to the occurrence of the Burdoin Fire. The site is topographically screened from Interstate 84 (I-84) due to the lower elevation of I-84. Additionally, the site is partially visible for approximately four miles along the Historic Columbia River Highway just before the Memaloose Overlook to the Rowena Plateau Viewpoint from varying distances ranging from approximately 1.25 to 3 miles.

The site is partially screened to the west and south by an extended mixed grove of oak and pine trees. Topography located to the south and east of the site screens the development to the southeast from Key Viewing Areas along I-84 east of McClure Lake and Rowena Plateau. Additionally, the Coyote Wall syncline topography screens the development from Key Viewing Areas west of Mosier.

Commission Rule 350-082-0070(50) defines cumulative effects as:

The combined effects of two or more activities. The effects may be related to the number of individual activities, or to the number of repeated activities on the same piece of ground. Cumulative effects can result from individually minor or collectively significant actions taking place over a period of time.

To determine cumulative effects of the proposed development, staff analyzed existing development surrounding the subject parcel within half a mile. Staff chose the half-mile study area because the parcels are within the same viewshed of the Key Viewing Areas noted above, and developments on the parcels within the study area contain similar dwellings, accessory buildings and use. As seen from Key Viewing Areas, the subject parcel is in an area where existing dwellings and accessory buildings are visible, but developments on parcels are clustered together in accordance with guidelines for the Pastoral landscape setting.

The seventeen parcels identified in the study area are designated as either Small-Scale Agriculture (80), SMA Agriculture, or Large-Scale Agriculture (160). None of the parcels within the study area have large enough acreage to allow land divisions that would result in at least an 80-acre or 160-acre parcel. Therefore, the seventeen parcels do not qualify for land divisions.

Out of the seventeen parcels within the study area, ten parcels had developments similar in size and number to the subject parcel which included single-family dwellings, accessory buildings, and agricultural-related structures and buildings. None of the parcels had campgrounds. Of the 17 parcels, six are located within Recreation Intensity

Class 1 which does not allow for a campground. Eleven parcels are located within Recreation Intensity Class 3 which allows for campgrounds for up to 50 individual units, though these parcels were also located within the Pastoral landscape setting which states that recreational uses be consistent with guidelines for Recreation Intensity Class 2 that allow for campgrounds of 20 units or less.

Guidelines for development in the Pastoral landscape setting, as discussed in Finding B.10, state that recreational uses should occur infrequently in the landscape. Out of the 17 parcels in the study area, only six are eligible for a low-intensity campground. If the seventeen other parcels developed campgrounds similar to the campground proposed with two campsites and minimal structures, there would be little visible effect on the landscape because with proposals would be small in nature, have minimal impact on the ground, and would be consistent with Recreation Resources Guidelines contained in Commission Rule 350-082-0700 through 0720. After reviewing the existing conditions in conjunction with potential cumulative effects, staff determined the proposed two-site low intensity campground would pose no additional adverse impacts to the landscape and viewshed.

5. Commission Rule 350-082-0600(2)(e) states that existing tree cover screening proposed development from key viewing areas shall be retained as specified in 350-082-0600(3). A condition of approval is included in the Director's Decision for the applicant to retain all existing vegetation.
6. Commission Rule 350-082-0600(2)(f) states that the silhouette of new buildings shall remain below the skyline of a bluff, cliff, or ridge as visible from key viewing areas.

No new buildings are proposed in the application.

7. Commission Rule 350-082-0600(2)(h-j) discusses standards for developments visible from key viewing areas:

(h) Unless expressly exempted by other provisions in 350-082-0600, colors of structures on sites visible from key viewing areas shall be dark earth-tones found at the specific site or in the surrounding landscape. The specific colors approved by the reviewing agency shall be included as a condition of approval.

(i) The exterior of buildings on lands visible from key viewing areas shall be composed of non-reflective materials or materials with low reflectivity. Continuous surfaces of glass shall be limited to ensure visual subordination. The Scenic Resources Implementation Handbook includes a list of recommended exterior materials and screening methods.

(j) Any exterior lighting shall be sited, limited in intensity, shielded, or hooded in a manner that prevents lights from being highly visible from key viewing areas and from noticeable contrasting with the surrounding landscape setting, except for road lighting necessary for safety purposes.

No new structures or buildings were proposed by the applicant. No exterior lighting was proposed in the application materials.

8. Commission Rule 350-082-0600(2)(q) states that new buildings shall not be permitted on lands visible from key viewing areas with slopes more than 30 percent. No new buildings were proposed. Analysis using CalTopo online maps determined the proposed campsite slope to be less than 10%.
9. Commission Rule 350-082-0600(2)(r) states that driveways and buildings shall be designed and sited to minimize visibility of cut banks and fill slopes from key viewing areas. The applicant did not propose a new driveway and the development site will be located on a slope of less than 10%. No new grading was proposed by the applicant. The proposed campground will be accessed by an existing road.
10. Commission Rule 350-082-0600(3)(a) discusses review uses within the Pastoral landscape setting:

(A) Accessory structures, outbuildings, and access ways shall be clustered together as much as possible, particularly towards the edges of existing meadows, pastures, and farm fields.

No new structures were proposed. The proposed campsites are located adjacent to the existing road and adjacent to Old Highway 8.

(B) In portions of this setting visible from key viewing areas, the following guidelines shall be employed to achieve visual subordination for new development and expansion of existing development:

- (i) Except as is necessary for site development or safety purposes, the existing tree cover screening the development from key viewing areas shall be retained.*
- (ii) Vegetative landscaping shall, where feasible, retain the open character of existing pastures and fields.*
- (iii) At least half of any trees planted for screening purposes shall be species native to the setting. Examples of native species are identified in the Scenic Implementation Handbook as appropriate for the area.*
- (iv) At least one-quarter of any trees planted for screening shall be coniferous for winter screening. Variances may be granted to this guideline when development is directly adjacent to or adjoining a landscape setting where coniferous trees are not common or appropriate (see Scenic Implementation Handbook for guidance), and trees species ultimately selected for winter screening are natives characteristic to that setting.*

Existing vegetation consists of thick stands of Oregon white oak and pine along the southern and western boundary of the property as well as being sparsely located throughout the southeastern corner. The applicant did not propose removing any existing vegetation or planting new vegetation. A condition of approval is included in the Director's Decision for the retention of existing vegetation.

(C) Compatible Recreation Use Guideline: Resource-based recreation uses of a very low-intensity or low-intensity nature (350-082-0700(1) and (2)), occurring infrequently in the landscape, are compatible with this setting.

The applicant proposed a low-intensity campground consisting of two dry and self-contained sites with adjacent parking. There are no other campsites in the area. Recreation resources are evaluated below in Section E.

Scenic Resources Conclusion:

With conditions of approval listed in the Director's Decision, this application meets the criteria for guidelines for protecting Scenic Resources in the National Scenic Area.

C. Cultural Resources

1. Commission Rule 350-082-0620(1) describes general provisions for implementing the Cultural Resources Protection Process.
2. Except as specified in Commission Rule 350-082-0620(2)(a)(C), new development in the Columbia River Gorge National Scenic Area requires a reconnaissance survey.
3. Luciano Legnini, Archeologist for the U.S. Forest Service Columbia River Gorge National Scenic Area, reviewed the land use application and determined in a Cultural Resources Survey Determination letter, dated May 30, 2025, that pursuant to Commission Rule 350-082-0620(2)(a)(C) a Cultural Resource Reconnaissance Survey is not required.

Though C25-0001 was noticed on March 19, 2025, there was already a pending application C24-0009 for a replacement single-family dwelling and detached garage (see Finding A.3). Mr. Legnini found that the Cultural Reconnaissance Survey needed for C24-0009 would also cover the area for the proposed development in this application. No further surveys were required.

4. Commission Rule 350-082-0620(2)(a)(D) describes when a historic survey is required. In his May 30, 2025 Cultural Resources Determination letter, Mr. Legnini determined that a historic survey is not required.
5. Rule 350-082-0620(2)(g)(B)(i) states the cultural resource protection process may conclude when the following conditions exist:

The proposed use does not require a reconnaissance or historic survey, no cultural resources are known to exist in the project area, and no substantiated concerns were voiced by interested persons within 30 calendar days of the date that a notice was mailed.

The project notice was mailed on March 19 2025, and the comment period ended on April 9,2025. Pursuant to Commission Rule 350-082-0620(2)(g)(B)(i), the cultural resource protection process may conclude.

6. Commission Rule 350-082-0620(6) protects cultural resources discovered during construction. It requires that if cultural resources are discovered after construction begins, all construction activities within one hundred feet of the discovered cultural

resource shall cease; further disturbance is prohibited, and the Gorge Commission shall be notified within 24 hours of the discovery. A condition of approval is included in the Director's Decision consistent with this rule.

7. Commission Rule 350-082-0620(7) contains provisions addressing discovery of human remains during construction. A condition of approval is included in the Director's Decision consistent with this rule.

Cultural Resources Conclusion

With conditions avoiding and protecting known and unknown cultural resources and human remains discovered during construction, the proposal is consistent with the guidelines in Commission Rule 350-082-540 that protects cultural resources in the National Scenic Area.

D. Natural Resources

1. Commission Rule 350-082-0640(1) discusses wetlands boundaries and site plans for review uses in wetlands. Staff conducted site visits and consulted Gorge Commission natural resource inventory maps, and found no wetlands are present within the buffer zone of the site. The closest wetland is more than 2,000 feet from the proposed development.
2. According to Gorge Commission GIS maps, two streams converge in the southwest corner of the property labeled as fish-bearing.

During a site visit on February 6, 2025, Amber Johnson, Wildlife Biologist for Washington Department of Fish and Wildlife (WDFW), confirmed that the stream is non-fish bearing, seasonal, and intermittent.

Ms. Johnson identified that the two streams located on the property are identified on WDFW maps as non-fish bearing to the south of the property due to the nature of steep geographical features located approximately 2,300 feet southeast of the corner of the property. Commission Rule 350-082-0640(6)(f) requires a 100 ft buffer for streams used by anadromous or resident fish and Commission Rule 350-082-0640(6)(g) requires a 50 ft buffer for intermittent streams not used by anadromous or residential fish.

Staff determined that the two proposed campsites are located more than 50 feet from the closest stream.

3. Commission Rule 350-082-0650 provides guidelines for protecting Priority Habitats and sensitive wildlife sites in the National Scenic Area. The proposed development takes place in deer and elk winter range and Oregon white oak woodlands, which are Priority Habitat under Commission Rule 350-082-0690, Table 1.
4. Commission Rule 350-082-0650(3) describes the review process for development within 1,000 feet of a priority habitat. Commission Rule 350-082-580(3)(a) requires the Gorge Commission notifies the Washington Department of Fish and Wildlife

(WDFW) when a new development or land use is proposed within a sensitive wildlife area or habitat, in this case, Oregon white oak and deer and elk winter range.

Oregon white oak are identified on the proposed site plan, but none are proposed to be removed. A condition of approval in the Director's Decision is included to ensure no Oregon white oak will be removed.

In addition, the site and the surrounding landscape is identified as a habitat for White and Black-tailed Deer winter range. On March 19, 2025, Gorge Commission staff sent WDFW a copy of the applicant's land use application and site plan. WDFW did not send a comment in response to the notice. Pursuant the Commission Rule 350-082-0650(3)(d), the wildlife protection process may conclude because the proposed use would not compromise the integrity of the Priority Habitat.

5. Commission Rule 350-082-0650(4)(d) states:

The wildlife protection process may terminate if the Development Review Officer, in consultation with the appropriate state wildlife agency, determines: the sensitive wildlife area is not active; or the proposed use would not compromise the integrity of the wildlife area, or occur during the time of the year when wildlife species are sensitive to disturbance.

Amber Johnson, WDFW Habitat Biologist, did not express any concerns with the proposal regarding deer and elk winter range. The proposal will not reduce the acreage of deer and elk winter range, nor will it result in changes to vegetation or accessibility of winter range habitat to wildlife. The proposed use will not compromise the integrity of the wildlife area.

6. The Gorge Commission's sensitive plant inventory does not show any sensitive plant sites within 1,000 feet of the proposed development. The proposal complies with Commission Rule 350-082-0660 that protects sensitive plants.

Natural Resources Conclusion:

With the conditions of approval discussed above, the proposed development is consistent with the rules in Commission Rule 350-082, Sections 0640 through 0660, that protect natural resources in the National Scenic Area.

E. RECREATION RESOURCES

1. Finding B.10 discusses review uses within the Pastoral landscape setting. Commission Rule 350-082-0600(3)(a)(C) states:

Compatible Recreation Use Guideline: Resource-based recreation uses of a very low-intensity or low-intensity nature (350-082-0700(1) and (2)), occurring infrequently in the landscape, are compatible with this setting.

The proposed development is a low-intensity two site campground sited within the Pastoral landscape setting. Recreation Intensity Class 3 [CR 350-082-0700(3)(d)(A)] allows all uses permitted in Recreation Intensity Classes 1 and 2. Though the campground site is located in Recreation Intensity Class (RIC) 3 (Moderate Intensity)

according to Gorge Commission GIS maps (see Figure 1), staff have decided to review the proposed use under the guidelines for Recreation Intensity Class 2 (Low Intensity) in order to be compatible with the guidelines listed for recreation uses within the Pastoral landscape setting.

2. Commission Rule 350-082-0700(2)(d) discusses review uses within Recreation Intensity Class 2 (Low Intensity):

(d) The following uses may be permitted subject to compliance with 350-082-0720:

(A) All uses permitted in Recreation Intensity Class 1.

(B) Parking areas, not to exceed a site-wide capacity of 25 vehicles, when associated with any allowed uses in Recreation Intensity Class 2. Parking spaces for campground units shall be included in this number. Accommodations for mass transportation facilities should be considered where compatible with the social and physical settings.

(C) Boat ramps, not to exceed two lanes.

(D) Campgrounds for 20 units or less, tent sites only.

The applicant has proposed two campsites with adjacent parking spaces for the campground. No additional infrastructure was proposed for the campground. The sites will be considered “dry” and self-contained.

3. Commission Rule 350-082-0700(5) states:

(a) Compliance with 350-082-0600 through 0720.

(b) Cumulative effects of proposed recreation projects on landscape settings shall be based on the “compatible recreation use” guideline for the landscape setting in which the use is located.

Cumulative effects of the proposed recreation development are described in Finding B.4. Finding B.10 discusses Recreation Intensity Classes compatible with the Pastoral landscape setting. Though the project site is located in RIC 3, Finding E.1 and E.2 describes how the proposed campground is reviewed under RIC 2 in order to be compatible with the Pastoral landscape setting.

(c) For proposed recreation projects in or adjacent to lands designated Large-Scale Agriculture, Small-Scale Agriculture, Commercial Forest Land, Large Woodland, or Small Woodland:

(A) The use would not seriously interfere with accepted forest or agricultural practices on surrounding lands devoted to forest or farm uses. Provision of on-site buffers may be used to partially or fully comply with this criterion, depending upon project design and site conditions.

(B) A declaration has been signed by the project applicant or owner and recorded with county deeds and records specifying that the applicant or owner is aware that operators are entitled to carry on accepted forest or farm practices on lands designated Large-Scale

Agriculture, Small-Scale Agriculture, Commercial Forest Land, Large Woodland, or Small Woodland.

The primary type of agriculture on adjacent parcels are vineyards located on parcels to the east. Oregon white oak and pine trees grow along the southern and eastern perimeters of the subject parcel. Commission Rule 250-082-0580(2) describes buffer zones for different agriculture types in the National Scenic Area. For vineyards with a natural or created vegetation barrier, the buffer zone is 50 feet. According to Gorge Commission GIS maps, the proposed campsites are located approximately 700 feet from the parcel to the east and 380 feet from the parcel to the northeast, both of which have vineyards.

A condition of approval is included in the Director's Decision that a declaration be signed by the applicant and recorded with county deeds and records stating they are aware that operators are entitled to carry on accepted farm practices on lands designated Large-Scale Agriculture or Small-Scale Agriculture.

4. Commission Rule 350-082-0700(5)(d) discussed standards for proposed campgrounds that include facilities for outdoor fires for cooking or other purposes. The applicant did not propose any facilities for outdoor fires.
5. Commission Rule 350-082-0720(1)-(13) describes Facility Design Guidelines for All GMA and SMA Recreation Projects.

Commission Rule 350-082-0070(144) defines Recreation facility as "A cluster or grouping of recreational developments or improvements located in relatively close proximity to one another, and that are not separated in distance by more than 1/4 mile of land that does not contain any such recreational developments or improvements, except for roads or pathways."

The two proposed campsites and adjacent parking spaces are located within approximately 150 of each other and are designated as one recreation facility.

6. Commission Rule 350-082-0720(1) describes criteria for recreation facilities that are not resource-based in nature.

Commission Rule 350-082-0070(156) defines Resource-Based Recreation as recreation uses that are essentially dependent upon the natural, scenic, or cultural resources of the National Scenic Area and that do not adversely affect those resources.

The proposed use of two low-intensity campsites is being reviewed as a resource-based recreation facility due to its location and dependence on the scenic landscape.

Commission Rule 350-082-0700(2) discusses the guidelines for recreation uses within Recreation Intensity Class 2 (Low Intensity) areas. A low intensity recreation area is characterized by "opportunities to experience, relaxation, physical fitness and outdoor learning where there is a moderate probability to experience solitude." Additionally, the physical setting is characterized as being "predominantly natural or natural appearing landscapes with rustic improvements... [and] where developed recreation site[s]...are noticeable but harmonize with the natural environment."

The proposed site is located in the Pastoral landscape setting where row crops are grown in fields bordered by oak trees and agricultural buildings are clustered along the edges of the fields. Apart from the agricultural uses, the landscape consists of gently sloping hills made of volcanic rock and soil. Two streams converge on the subject property. The proposed campground does not consist of any physical infrastructure allowing it to blend naturally with the landscape.

7. Commission Rule 350-082-0720(2) states:

The facility design guidelines are intended to apply to individual recreation facilities. Development or improvements within the same Recreation Intensity Class are considered as separate facilities if they are separated by at least ¼ mile of undeveloped land (excluding trails, pathways, or access roads).

The two proposed campsites are located within approximately 150 feet of each other and therefore are considered as one facility.

8. Commission Rule 350-082-0720(3) states that existing vegetation, particularly mature trees, shall be maintained to maximum extent practicable. Existing vegetation consists of Oregon white oak and pine scattered throughout the proposed site and along the perimeter of the subject property. The applicants did not propose and tree removal. A condition of approval is included in the director's decision that all existing vegetation shall be retained.
9. Commission Rule 350-082-0720(4) explains that parking areas providing more than 50 spaces shall be divided into discrete "islands" separated by unpaved, landscaped buffer areas.

The applicants proposed two parking spaces adjacent to each proposed campsite. No additional spacing is required.

10. Commission Rule 350-082-0720(5) says that lineal frontage of parking areas and campsite loops on scenic travel corridors shall be minimized. Commission Rule 350-082-0070(162) defines Scenic Travel Corridor as:

Those portions of Interstate 84, the Historic Columbia River Highway, Oregon Highway 35, and Washington State Routes 14, 141, and 142 located in the National Scenic Area and specifically designated to be managed as scenic and recreational travel routes.

The subject property of the proposed site is located off Old Highway 8 near Lyle, Washington, which is not designated as a scenic travel corridor.

11. Commission Rule 350-082-0720(6) states that ingress and egress points shall be consolidated to the maximum extent practicable, providing adequate emergency access pursuant to applicable fire and safety codes.

The proposed campsites will be accessed by the main driveway of the property that enters from Old Highway 8 at the southern boundary of the property. No other access

points were proposed. The existing driveway is approximately 20 feet wide which is adequate for emergency access.

12. Commission Rule 350-082-0720(7) states that signs shall be limited to those necessary to provide relevant recreation or facility information, interpretive information, vehicular and pedestrian direction, and for safety purposes.

No signs were proposed in the application.

13. Commission Rule 350-082-0720(8) discusses standards for innovative designs and materials that reduce visual impacts. No designs or materials were proposed in the application.

14. Commission Rule 350-082-0720(9) discusses standards for plants in landscaped areas. The applicant proposed no new landscaping or vegetation.

15. Commission Rule 350-082-0720(10) discusses interior landscaping buffers for any parking area with over 50 spaces. The proposal includes two low-intensity campsites with one adjacent parking space per campsite, which is well under 50 parking spaces. This standard does not apply.

16. Commission Rule 350-082-0720(11-12) states,

(11) Grading or soil compaction within the “drip line” of existing mature trees shall be avoided to the maximum extent practicable, to reduce the risk of root damage and associated tree mortality.

(12) Project applicants shall use measures and equipment necessary for the proper maintenance and survival of all vegetation used to meet landscape standards, and shall be responsible for such maintenance and survival.

No new grading or soil compaction was proposed in the application. A condition of approval is included in the Director’s Decision to ensure no grading or soil compaction will take place within the drip line of existing vegetation. Additionally, a condition of approval is included in the Director’s Decision for the maintenance and survival of all vegetation on the site.

17. Commission Rule 350-082-0720(13) states:

All parking areas shall be set back from the property boundaries by at least 50 feet. All campsites and associated facilities shall be set back from property boundaries by at least 100 feet.

The two proposed campsites and adjacent parking spaces are both located approximately 105 feet and 115 feet from the southern property boundary.

18. Commission Rule 350-082-0580(3) states:

Buffers from Existing Recreation Sites. If new buildings or structures may detract from the use and enjoyment of established recreation sites, an appropriate buffer shall be established between the building or structure and the parcel.

The property is designated Recreation Intensity Class 1 and 3. There are no established recreation sites on any adjacent properties. The closest recreation site is Catherine Creek Trailhead which is located approximately 1.3 miles from the proposed campground. The proposed development will not detract from the use and enjoyment of any established recreation sites or proposed recreation sites.

Recreation Resources Conclusion:

The proposed development is consistent with Commission Rule 350-082-0580(3) and 350-082-0700.

F. TREATY RIGHTS PROTECTION

1. Commission Rule 350-082-0130 provides protection of tribal treaty rights from new development in the National Scenic Area. Consistent with Commission Rule 350-082-0130(1)(a), notice of the proposed development was provided to the tribal governments on March 19, 2025.
2. Commission Rule 350-082-0130(1)(b) lists other notice requirements for projects in or providing access to the Columbia River or its fish bearing tributaries or for projects that may affect tribal treaty rights. The subject parcel does not adjoin the Columbia River or its fish-bearing tributaries and does not provide access to the Columbia River.
3. Commission Rule 350-082-0700(5)(f) requires applicants of projects providing recreation access to the Columbia River and its tributaries to demonstrate that the new facility is consistent with and does not affect or modify tribal treaty rights. The subject parcel does not adjoin the Columbia River or its tributaries and does not provide access to the Columbia River.
4. Commission Rule 350-082-0130(1)(c) requires the Commission to offer to meet with or consult with the tribal governments prior to making a decision on the proposed development, and to make this offer more than once. The Commission provided the first offer to meet or consult with the initial notice on March 19, 2025.
5. Commission Rule 350-082-0130(d) provides thirty calendar days for tribal governments to request consultation regarding tribal treaty rights. No comments were received after the initial notice was provided on March 19, 2025, or after the second notice was provided on June 5, 2025.
6. Commission Rule 350-082-0130(i) states:

The treaty rights protection process may conclude if the Executive Director determines that the proposed uses would not affect or modify treaty or other rights of any Indian tribe. Uses that would affect or modify such rights shall be prohibited.

The subject parcel does not provide access to the Columbia River or its fish bearing tributaries. No known treaty rights are affected by this proposal, and no treaty rights concerns were raised by the tribal governments. Because the proposed use does not

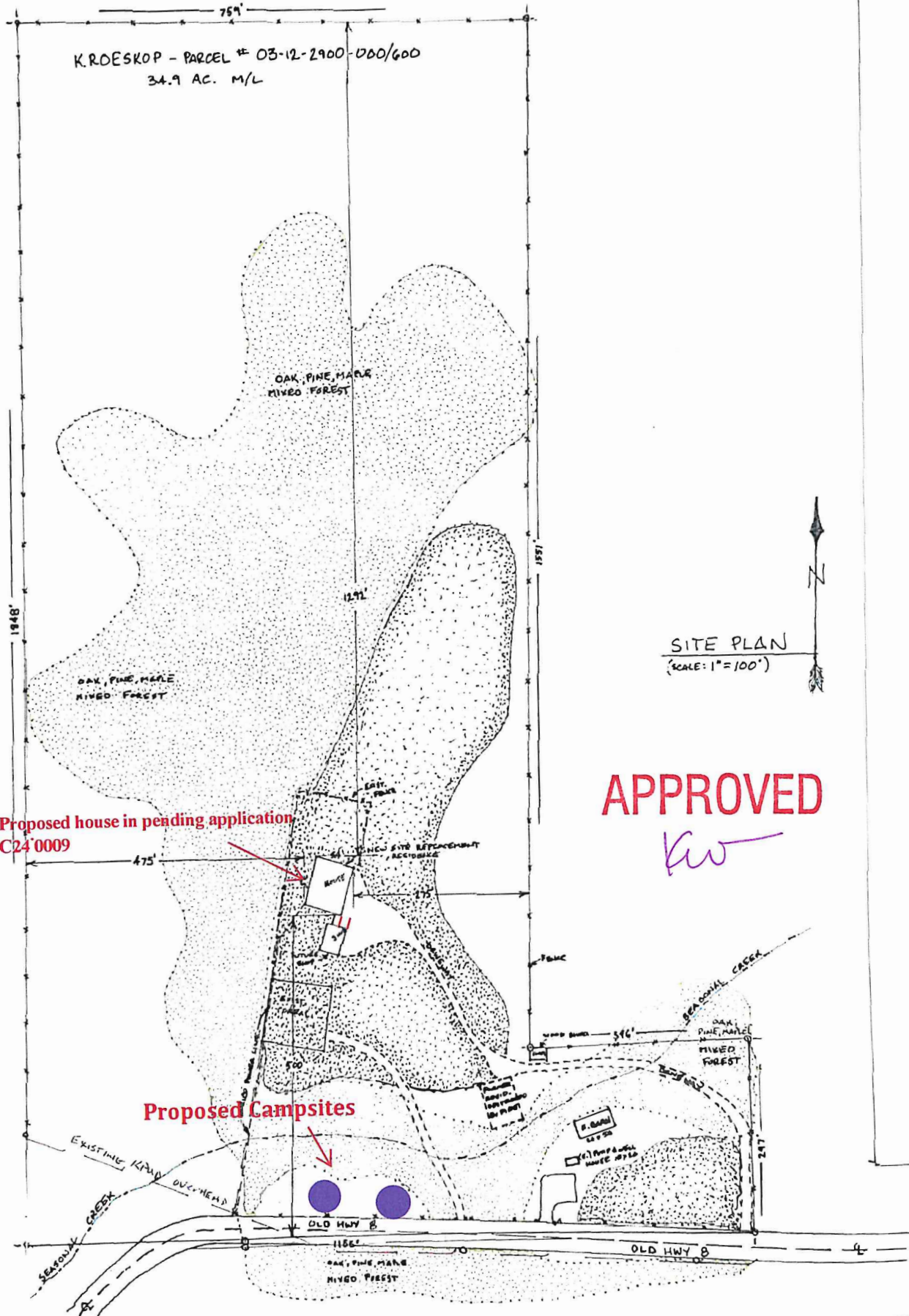
affect or modify treaty or other rights of any Indian tribe, the treaty rights protection process may conclude pursuant to Commission Rule 350-082-0130.

Treaty Rights Conclusion:

The proposed development is consistent with the guidelines in Commission Rule 350-082-0130, which provides protection for treaty rights and any other rights of any Indian tribe.

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K.ROESKOP - PARCEL # 03-12-2900-000/600
34.9 AC. M/L



SITE PLAN
(SCALE: 1" = 100')

APPROVED

Kw