Director's Decision

Summary of Application

FILE NUMBER:	C26-0007
PROPOSAL:	The Columbia River Gorge Commission has received an application for the replacement of an accessory building.
APPLICANT:	Audrey Bruce
LANDOWNER:	Audrey Bruce
SIZE and LOCATION:	The subject parcel is 20 acres in size and is described as Tax Lot Numbers 03-11-3300-0005/00 in the northwest 1/4 of Section 33, Township 3 North, Range 11 East, Willamette Meridian, Klickitat County, Washington.
LAND USE DESIGNATION:	General Management Area (GMA)–Small-Scale Agriculture (80) Note: The parcel is managed as General Management Area Small-Scale Agriculture pursuant to the provisions of Section 8(o) of the National Scenic Area Act. The proposed development is reviewed according to the applicable GMA land use and resource protection guidelines.

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 Audrey Bruce, for the replacement of an accessory building, 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 applicants 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 or site plan will require a new application and review.

5. The replacement building shall be constructed as shown on the approved project description, site plan and elevation drawings. The replacement building shall be built within the existing footprint and in the same location as the dwelling it is replacing. The proposed building shall be 540 sq ft (18 ft x 30 ft) and 10 ft tall. The walls of the building shall be 8 ft tall.

6. All exterior building materials for the dwelling, including roof, doors, siding, trim, window casings and sashes, decks, and railings shall be dark earth-tone colors. Only approved dark earth-tone colors for exterior materials shall be used. The following colors submitted by the applicant are consistent with this condition and hereby approved:

   Siding and Roofing: Coast to Coast Carports, Inc. *Quaker Gray*

   Any changes to these colors shall be submitted to the Gorge Commission for consistency review with this condition of approval. The color of the development shall be maintained by painting and staining as necessary to maintain the approved color.

7. All exterior building materials including roofs, doors, siding, trim, window casing and sash, decks, and railings shall be nonreflective or have low reflectivity. Any exterior metal materials shall be painted with low-gloss black colored finish and maintained as necessary to ensure that the material is non-reflective.

8. All exterior lighting shall be hooded or shielded at a 90-degree angle to the ground. Hoods/shields should be made of a non-reflective, opaque material, which does not allow light to pass through.

9. Except dead trees or other dead vegetation that may pose a safety hazard, existing mature vegetation shall be retained and maintained for screening purposes and so the overall visual character and appearance of the landscape is retained.

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 25 day of June 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 25 day of June 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 25 day of July 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 is 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 C26-0007
Approved site plans and elevation drawings
International Dark Sky Lighting Handout

Development Review Staff Report

Summary of Application

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LANDOWNER:	Audrey Bruce
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LAND USE DESIGNATION:	General Management Area (GMA)–Small-Scale Agriculture (80) Note: The parcel is managed as General Management Area Small-Scale Agriculture pursuant to the provisions of Section 8(o) of the National Scenic Area Act. The proposed development is reviewed according to the applicable GMA land use and resource protection guidelines.

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 the Warm Springs Reservation Oregon (CTWSRO)
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

Washington Department of Fish and Wildlife (WDFW)
Friends of the Columbia Gorge

Written Comments Received From:

Friends of the Columbia Gorge (Steve McCoy, Staff Attorney)
USFS CRGNSA (Luciano Legnini, Archaeologist)

Findings of Fact

A. Land Use

1. Audrey Bruce is proposing to replace an accessory building that was destroyed during the Burdoin Fire in July 2025. The subject parcel is approximately 20 acres in size and is located at 61 Windy Bluff Road off Courtney Road.

2. All buildings and structures on Ms. Bruce's property were destroyed during the Burdoin Fire, except for one steel accessory building. Ms. Bruce would like to replace the manufactured home now and the accessory buildings later.

3. Management Plan Existing Uses Guideline 3[1] allows for the replacement of existing structures that are damaged or destroyed by disaster. It states:

   Replacement of Existing Structures Destroyed by Disaster: An existing structure destroyed by fire, flood, landslide or other similar disaster may be replaced in accordance with the following standards:
   A. If the replacement structure does not comply with guidelines 3.C through 3.E below, then it shall be subject to guideline 2 above and the time period in guideline 3.G.

   Compliance with guidelines 3.C through 3.E follows below.

   B. As used in guidelines 3, 4, and 5, the term "original structure" or "original dwelling" means the structure or dwelling that was destroyed and was an existing structure or dwelling as defined in the Management Plan.

   Commission Rule 350-082-0070(73) defines *existing use or structure* as:

   Existing use or structure: Any use or structure that was legally established and that has continued to operate lawfully and has not been discontinued. "Legally established" means:
   (a) The landowner or developer obtained applicable land use and building permits and complied with land use regulations and other laws that were in effect at the time the use or structure was established, or that were in effect at

[1] References to the Management Plan in this staff report refer to the Management Plan as amended by PA-2025-01 (January 13, 2026). The Gorge Commission specified that the plan amendment became effective upon concurrence by the U.S. Secretary of Agriculture (February 24, 2026). As of the date of this staff report, the Gorge Commission has not yet amended its land use ordinance to incorporate the amendment.

the time the landowner or developer corrected an improperly established use or structure;
(b) The use or structure was initially operated or constructed according to those applicable permits, land use regulations and other laws, or has been operated or constructed according to permits obtained to correct an improperly established use or structure; and
(c) Any changes to the original use or structure must comply with all applicable permit requirements, land use regulations and other laws that were in effect at the time the change was established.

It is unknown when the original building was constructed, staff identified the building in aerial imagery dating back to 1988. Ms. Bruce said that the original building was constructed before the house, around 1985. The original manufactured home was approved in 1985 with Klickitat County Building Permit MP2085. The building was constructed before Klickitat County began issuing building permits and the date of the National Scenic Area Act.

C. The replacement structure shall have the same use as the original structure. An existing manufactured home may be replaced with a framed residence.

Ms. Bruce proposes replacing a building that was destroyed by the Burdoin Fire. The original building was a stick built agricultural building, and the proposed replacement dwelling will be a metal building. The original barn was 180 sq ft (18 ft x 10 ft) with two attached lean tos: one lean to was 308 sq ft (28 ft x 11ft) and the other lean was 144 sq ft (18ft x 8ft). The total footprint of the barn that was destroyed was 632 sq ft.

D. The replacement structure and utilities shall be in the same location as the original structure and utilities. The same location means that the footprint of the replacement structure is centered on the footprint of the original structure using the same orientation as the original structure or rotating the orientation by up to 10 degrees. The footprint of the replacement structure may extend no more than 10 percent beyond any one or more sides of the original footprint. The footprint of a structure includes any covered decks and porches, attached garages, and breezeways that share a wall with the structure.

The replacement barn will be built within the existing footprint and in the same location as the previous barn it is replacing. The site is located directly west of the dwelling and at the same elevation.

E. A replacement structure shall not exceed the same square foot size, footprint, and height as the original structure. The size, footprint, and height of a building include any covered decks and porches, attached garages, and breezeways that share a wall with the structure. The following adjustments to size, footprint and height are permitted for replacement structures:
(1) The square foot size of a replacement structure may be larger than the square foot size of the original structure only as follows:

(a) If the original structure was 1250 square feet or smaller in size, the replacement structure may be built up to 20 percent larger than the original structure.
(b) If the original structure was larger than 1250 square feet in size and no larger than 2000 square feet in size, the replacement structure may be built up to 1500 square feet in size or 10 percent larger than the original structure, whichever is larger.
(c) If the original structure was larger than 2000 square feet in size and no larger than 2850 square feet, the replacement structure may be built up to 2200 square feet in size or 5 percent larger than the original structure, whichever is larger.
(d) If the original structure was larger than 2850 square feet, the replacement structure may be built up to 3000 square feet in size or the same size as the original structure, whichever is larger.

The proposed barn will not be larger than the barn it is replacing.

(2) Notwithstanding the allowance for larger replacement structures in paragraph (1) above, the footprint of a replacement accessory building or buildings shall not exceed the footprint permitted for accessory buildings in the applicable land use designation, except, if the footprint of an original accessory building or buildings exceeded the footprint permitted for accessory buildings in the applicable land use designation, the replacement accessory building or buildings shall not exceed the original footprint of the accessory building or buildings.

Commission Rule 350-082-0240(3)(f) contains guidelines for accessory buildings on parcels that are larger than 10 acres in size:

Accessory building(s) larger than 200 square feet in area or taller than ten feet in height for a dwelling on any legal parcel larger than ten acres in size are subject to the following additional standards:
(A) The combined footprints of all accessory buildings on a single parcel shall not exceed 2,500 square feet in area. This combined size limit refers to all accessory buildings on a parcel, including buildings allowed without review, existing buildings and proposed buildings.
(B) The footprint of any individual accessory building shall not exceed 1,500 square feet.
(C) The height of any individual accessory building shall not exceed 24 feet.

The proposed metal accessory building has a footprint of 540 sq ft; there is 270 sq ft (18 ft x 15 ft) of enclosed space and 270 sq ft (18 ft x 15 ft) of covered space without enclosed walls. Currently, there are two other accessory buildings on the property: a 60 sq ft pumphouse that was recently rebuilt and an existing metal carport that is 576 sq ft (24 ft x 24 ft). The total footprint for accessory buildings on the 20-acre parcel, including the proposed accessory building will be 1,176 sq ft, within the 2,500 sq ft limit.

(3)The walls of the replacement structure shall not exceed the height of the walls of the original structure unless an increase is required to comply with standards in the current jurisdictional building code. Wall height is the greatest vertical distance between the lowest finished grade and the lowest wall-to-roof connection of each wall. For a manufactured dwelling, the interior wall height may be up to 9 feet as measured from the finished floor to the finished ceiling.

The wall height of the building being replaced was eight feet, and the proposed wall height of the accessory building is six feet tall. The total height of the proposed accessory building is eight feet tall.

(4) The overall height of the replacement structure as measured from the lowest finished grade to the highest point of the roof shall not exceed the height as of the original structure. The roof of the replacement structure shall be the same style (e.g., hip, gable, flat) and the same or lower slope as the roof of the original structure to keep the same height. The slope and height of the roof of a replacement structure may exceed the slope and height of the original structure only as required to comply with applicable building codes. Where an original structure protruded above the skyline, the replacement structure shall not protrude farther above the skyline. Where the height of a replacement structure protrudes farther above the skyline than the original structure, a different roof shape shall be used to reduce the protrusion to the original amount of protrusion.

The owner stated that original barn was no taller than ten feet tall. The current proposal is for the barn to be eight feet tall, two feet shorter than the original building. The original roof of the barn was a gable roof with an attached lean-to that had a shed roof. The new building will only have a gable roof and is shorter in height than the original building, consistent with this rule.

(5) If, after applying guidelines 3.E(1) through 3.E(4), an applicant demonstrates that the size, footprint, or height of a replacement manufactured dwelling that is closest in size, footprint, or height of the original manufactured dwelling is not reasonably available (e.g., considering time to manufacture, distance to manufacturer, cost to customize, and similar factors), then the applicant may place a manufactured dwelling that is closest in size, footprint, and height to the original manufactured dwelling, even if it exceeds the standards in guidelines 3.E(1) through 3.E(4).

Ms. Bruce is not proposing a manufactured home, this rule does not apply.

G. An original structure shall be considered discontinued if development of a replacement structure approved under these guidelines for replacement of an existing structure destroyed by disaster has not commenced within ten years of the date the structure was destroyed. Each replacement structure on a parcel is separately subject to this ten-year period. Commencement of development in this provision is determined in accordance with the guidelines for expiration of approvals.

All of Ms. Bruce's original buildings, except one accessory building, were destroyed by the Burdoin Fire in July 2025. Ms. Bruce contacted the Commission shortly after to inquire about a replacement. Ms. Bruce applied for the replacement building in April 2026; within two years of the date the original building was destroyed. The application was complete when Ms. Bruce submitted it.

Land Use Conclusion:

The proposed development is an allowed review use, subject to Commission Rules 350-082-0600 through 350-082-0720 that protect scenic, cultural, natural, and recreation resources.

B. SCENIC RESOURCES

1. Existing Uses Guideline 3(F) in the Management Plan states:

   In addition to the standards in guidelines 3.B through 3.E above, the replacement structure shall only be subject to the following scenic and cultural resources standards (and not other standards in Part I and Part II of the Management Plan). These standards apply to all replacement structures, including replacement structures for original structures that existed prior to the National Scenic Area Act.

2. Existing Uses Guideline 3(F)(1)(a) in the Management Plan states:

   The replacement structure shall comply with the scenic resources guidelines regarding color and reflectivity (Part I, Chapter 1: Scenic Resources). These guidelines shall be applied to achieve the applicable scenic standard (visually subordinate or not visually evident) to the maximum extent practicable.

   Commission Rule 350-082-0600(2)(h) states:

   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.

   The proposed development has been designed to achieve visual subordinance using the following dark earth-tone color:

   Siding and Roofing: Coast to Coast Carports, Inc. *Quaker Gray*

   This color is a dark earth-tone and found at the site on the rocks, shaded leaves and bark of trees and vegetation. A **condition of approval** is included in the Director's Decision requiring all elements of the proposal to be this color, consistent with Commission Rule 350-082-0600(2)(h).

   Commission Rules 350-082-0600(2)(i) states:

   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 subordinance. The Scenic Resources Implementation Handbook includes a list of recommended exterior materials and screening methods.

The equipment storage building will be metal which is reflective. The owners have chosen a dark gray color with a Light Reflectivity Rating (LRV) under 10 to ensure the metal roofing has low reflectivity.

A **condition of approval** is also included requiring all exterior surfaces of the proposed development, including doors, siding, trim, window casing and sash, decks, and railings to be composed of non-reflective materials to ensure consistency with this rule.

Commission Rule 350-082-0600(2)(j) states:

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 noticeably contrasting with the surrounding landscape setting, except for road lighting necessary for safety purposes.

A **condition of approval** is included in the decision ensuring lights are directed downward, hooded, and shielded such that they are not highly visible from KVAs, consistent with this rule. Staff are also providing Ms. Bruce with examples of acceptable light fixtures from the International Dark-Sky Association as an attachment to this decision.

3. Existing Uses Guideline 3(F)(1)(b) in the Management Plan states:

   (b) Decks, verandas, balconies and other open portions of the original structure shall not be rebuilt as enclosed (walls and roof) portions of the replacement structure.

   The original barn being replaced was an enclosed structure with four walls and roof. The proposed metal building has 270 sq ft (18 ft x 15 ft) of enclosed space and 270 sq ft (18 ft x 15 ft) of covered space without enclosed walls. No portions of the original structures will be rebuilt as enclosed, consistent with this rule.

4. Existing Uses Guideline 3(F)(1)(c) in the Management Plan states:

   (c) In the General Management Area, the replacement structure shall comply with the GMA scenic resources guidelines regarding landscaping. These guidelines shall be applied to achieve the applicable scenic standard (visually subordinate) to the maximum extent practicable, and may take into account recommendations for defensible space in the Scenic Resources Implementation Handbook.

   Commission Rule 350-082-0070(202) defines *visually subordinate* as follows:

   . . . A description of the relative visibility of a development, structure, or use where that development, structure, or use does not noticeably contrast with the defining landscape setting characteristics, as viewed from a specified vantage point (generally a key viewing area, for the Management Plan) and the setting

appears only slightly altered (distinctive characteristics of that setting remain dominant). As opposed to development, structures, or uses that are fully screened, structures that are visually subordinate may be partially visible but would be difficult to discern to the common viewer. Visually subordinate development, structures, or uses as well as forest practices in the SMAs shall repeat form, line, color, or texture common to the natural landscape, while changes in their qualities of scale, proportion, intensity, direction, pattern, etc., shall not dominate the natural landscape setting.

Staff determined the subject parcel is topographically visible from three KVAs: Columbia River, Historic Columbia River Highway (HCRH), and I-84. The proposed development is visible from KVAs at the following distance zones:

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

Commission Rule 350-082-0200(4)(d)(C) requires the development to comply with the GMA guidelines regarding landscaping to achieve the standard *visually subordinate* to the maximum extent practicable. The closest KVAs from which the project is visible are over a mile away. The building site is set back from the bluff of Burdoin Mountain by over 350 ft which partially blocks the proposed building site from view. The building site is set in a draw, with hills to the west, north and east. The upper portions of the building will be visible from HCRCH to the south because it is higher in elevation than other KVAs at 500 ft. From lower KVAs, I-84 and the Columbia River, only very small portions of the southern façade of the building will be visible, and the building will be almost indistinguishable from the landscape. The visual impact is small and can be mitigated through conditions of approval. As discussed above, Commission Rule 350-082-0200(4)(d)(A) requires all proposals to be constructed of low-reflective materials and dark earth-tone colors.

Additionally, Commission Rule 350-082-0600(2)(c) requires the extent and type of conditions applied to a development to achieve the scenic standard of *visually subordinate* be proportionate to the building's degree of visibility from KVAs. The proposed development follows the standards for the replacement of existing structures damaged or destroyed by disaster, consistent with this rule. As discussed below, factors contributing to the visibility of the development include the location, size, shape, dark earth-tone colors, low reflective building materials, distance from KVAs and existing topography, vegetation, and screening. With conditions of approval regarding the colors and reflectivity of the building materials and the retention of existing vegetation on the parcel, the Director's Decision has requirements and conditions of approval to ensure the development is *visually subordinate.*

5. Existing Uses Guideline 3(F)(1)(e) in the Management Plan states:

   A significant historic structure that was destroyed by disaster and that is preserved, rehabilitated, restored, or reconstructed in accordance with the National Register of Historic Places guidelines (for structures in the SMA) or the National Park Service regulations for structures included in, or eligible for inclusion in, the National Register of Historic Places (for structures in the GMA) shall not be subject to guidelines 3.F(1) through 3.F(4) above.

   The original barn was not eligible to be listed in the National Register of Historic Places.

6. 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.

   Most of the vegetation was destroyed by the Burdoin Fire. The remaining existing vegetation consists of mostly oaks. Vegetation on the parcel before the fire included Oregon white oak, ponderosa pine, cottonwoods, serviceberry, and bitter cherry. Serviceberry and bitter cherry are considered fire adapted species and should sprout again. The remaining oaks will provide some screening for the proposal. No additional vegetation is needed to ensure the development is visually subordinate to its surrounding landscape when viewed from KVAs. The barn is primarily screened by existing topography because the building is set back from the Burdoin Mountain bluff over 350 feet to the north of the bluff. The proposal is consistent with Commission Rule 350-082-0600(1)(c).

7. Commission Rule 350-082-0600(2)(b) requires that a determination of potential visual effects and compliance with the visual subordinance standard in subsection (a) above include consideration of the cumulative effects of proposed development. 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 but collectively significant actions taking place over a period of time.

   The proposal is for the replacement of an accessory building that was destroyed during the Burdoin Fire. There will be no cumulative effects from the reconstruction of the building.

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

   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.

The building site is located at an elevation of 1,334 ft. The proposed building site is set back from the bluff of Burdoin mountain by about 350 ft which partially blocks the proposed building site from view. The building site is in a draw with hills to the west, north and east.

The closest KVAs from which the project is visible are over a mile away. Portions of the building site are topographically visible for approximately a half-mile segment along the Columbia River, I-84, and HCRH that extends west from Mosier in Oregon due south of the project site. These KVAs are all at low lying elevations varying between 80 and 500 feet. From these KVAs, the building is hard to see because it is set back on a shelf, away from the Burdoin Mountain bluff, by over 350 ft. The viewing distance and topography make the building site difficult to discern from KVAs.

From the Columbia River, the project is only slightly visible intermittently directly south of the development for a mile at an elevation of 80 feet. Similarly, the project is also visible from I-84 due south of the development site at an elevation of 100 ft for approximately a mile. From lower KVAs, I-84 and the Columbia River, only very small portions of the building will be visible at all

From the Historic Columbia River Highway, at an elevation varying from 400 ft to 500 ft, for 2.25 miles the project is visible in the north. The upper portions of the building will be visible from HCRCH to the south because it is higher in elevation than the other KVAs at 500 ft. Existing topography and trees along HCRH screen the proposed development site from view for some of this linear distance.

The replacement manufactured home will be in the same location and footprint as the original dwelling approved in 1985. The manufactured home is primarily screened by existing topography because the building is set back from the Burdoin Mountain bluff over 350 feet. No new landscaping is required to screen the development from view of KVAs. The existing vegetation consists of mostly oaks, although most of the vegetation was destroyed by the Burdoin Fire. The remaining oaks will provide some screening for the proposal. No additional vegetation is required to ensure the development is visually subordinate to its surrounding landscape when viewed from KVAs.

Given the distance from KVAs, existing topography and screening, and proposed building colors and materials, the building will have minimal visibility from KVAs. As explained above, conditions are applied to the development's color and reflectivity to ensure the development is visually subordinate to its setting as seen from KVAs. Along with the retention of the existing oak trees on property that survived the fire, the building will be visually subordinate.

9. Commission Rule 350-082-0600(2)(c) states:

The extent and type of conditions applied to a proposed development to achieve visual subordinance 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 subordinance:
(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.

Commission Rulle 350-082-0200(4)(d)(C) requires the development to comply with the GMA guidelines regarding landscaping to achieve the standard *visually subordinate* to the maximum extent practicable. The site is visible from three KVAs all located in the midground from the subject parcel. The primary contributing factors to the visual subordinance of the development include distance from KVAs, screening from topography and existing vegetation, and building materials with dark earth tone colors and low reflectivity. Given the viewing distance from KVAs over a mile away, the building will be difficult to discern in the landscape. Ms. Bruce has chosen dark earth-tone colors and low reflectivity building materials which are included as **conditions of approval**. On Ms. Bruce's property, it appears that most of the pine forest burned during the Burdoin Fire, but most of the oak survived. Consistent with the landscape settings design guidelines, a **condition of approval** requires existing vegetation on the parcel to be retained except for safety. With these conditions included in the Director's Decision, the proposal will be visually subordinate, as viewed by KVAs and consistent with the design guidelines for the Oak-Pine Woodlands Landscape Setting. Staff find these conditions to be proportionate to the development's potential visual impact as seen from KVAs.

10. Commission Rule 350-082-0600(2)(d) states:

New development shall be sited using existing topography and/or existing vegetation as needed to achieve visual subordinance from Key Viewing Areas. The following guidelines shall apply to new landscaping used to screen development from key viewing areas:
(A) New landscaping (including new earth berms) shall be required only when application of all other available guidelines in 350-082-0600 is not sufficient to make the development visually subordinate from key viewing areas. Alternate sites shall be considered prior to using new landscaping to achieve visual subordinance. Development shall be sited to avoid the need for new landscaping wherever possible.

(B) If new landscaping is required to make a proposed development visually subordinate from key viewing areas, existing on-site vegetative screening and other visibility factors shall be analyzed to determine the extent of new landscaping, and the size of new trees needed to achieve the standard. Any vegetation planted pursuant to this guideline shall be sized to provide sufficient screening to make the development visually subordinate within five years or less from the commencement of construction. If after five years the vegetation has not achieved a size sufficient to screen the development, the Executive Director may require additional screening to make the development visually subordinate.
(C) Unless as specified otherwise by provisions in 350-082-0600, landscaping shall be installed as soon as practicable, and prior to project completion.
(D) Applicants and successors in interest for the subject parcel are responsible for the proper maintenance and survival of planted vegetation, and replacement of such vegetation that does not survive.
(E) The Scenic Resources Implementation Handbook includes recommended species for each landscape setting consistent with 350-082-0600(3) and minimum recommended sizes of new trees planted (based on average growth rates expected for recommended species).

The replacement accessory building will be in the same location and footprint as the original building. No new landscaping is required to screen the development from view of KVAs. The existing vegetation consists of mostly oaks, although most of the vegetation was destroyed by the Burdoin Fire. No additional vegetation is needed to ensure the development is visually subordinate to its surrounding landscape when viewed from KVAs. The manufactured home is primarily screened by existing topography because the building is set back from the Burdoin Mountain bluff over 350 feet. The proposal is consistent with Commission Rule 350-082-0600(2)(d).

11. The Commission Rule 350-082-0600(2)(e) states:

    Existing tree cover screening proposed development from key viewing areas shall be retained as specified in 350-082-0600(3).

    The subject parcel is in the Oak-Pine Woodland landscape setting. Findings for the Landscape Settings Design Guidelines are addressed below.

12. The Landscape Settings map in the Management Plan classifies the landscape setting for the subject parcel as Oak-Pine Woodland. Commission Rule 350-082-0600(3)(c) contains guidelines for new development in this landscape setting. It states:

    Oak-Pine Woodland
    (A) Structure height shall remain below the tree canopy level of the dominant vegetation types of this setting.
    (B) In portions of this setting visible from key viewing areas, the following guidelines shall be employed to achieve visual subordinance for new development and expansion of existing development:

(i) At least half of any tree species planted for screening purposes shall be species native to the setting. Examples of native species are identified in the Scenic Implementation Handbook as appropriate to the area.
(ii) At least half of any trees planted for screening purposes shall be coniferous to provide winter screening.
(iii) For substantially wooded portions: Except as is necessary for construction of access roads, building pads, leach fields, etc., the existing tree cover screening the development from key viewing areas shall be retained.
(iv) For treeless portions or portions with scattered tree cover:
(I) Structures shall be sited on portions of the property that provide maximum screening from key viewing areas, using existing topographic features.
(II) Patterns of plantings for screening vegetation shall be in character with the surroundings. Residences in grassy, open areas or savannahs shall be partly screened with trees in small groupings and openings between groupings.
(III) 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 trees are proposed to be removed except for those that died in the Burdoin Fire and no additional vegetation is required for screening purposes. The existing vegetation consists of mostly oaks with a few scattered pines. Most of the vegetation except for the oak trees were destroyed by the Burdoin Fire. With a **condition of approval** requiring the retention of existing tree cover not killed by the fire, the proposed development is consistent with Commission Rule 350-082-0600(3)(f)(A) for new development within the Oak-Pine Woodland landscape setting.

Scenic Resources Conclusion:

The proposed development is consistent with Existing Uses Guideline 3(F) in the Management Plan that allows the replacement of existing structures destroyed by disaster.

C. CULTURAL RESOURCES

1. The proposed development Existing Uses Guideline 3(F) in the Management Plan states:

   In addition to the standards in guidelines 3.B through 3.E above, the replacement structure shall only be subject to the following scenic and cultural resources standards (and not other standards in Part I and Part II of the Management Plan). These standards apply to all replacement structures, including replacement structures for original structures that existed prior to the National Scenic Area Act.

2. Existing Uses Guideline 3(F)(2)(b) in the Management Plan states:

   In the General Management area, if the structure is replaced in the identical location, orientation, and footprint, and is the identical or smaller size and

height as the original structure, then the structure shall not require review for cultural resources.

3. Existing Uses Guideline 3(F)(2)(c) in the Management Plan states:

   In the General Management Area, if the structure is replaced in accordance with the standards in 3.D or 3.E, then the structure shall not require review for cultural resources, except, if the replacement structure is within 500 feet of known cultural resources or is within 100 feet of an area that has a high probability of containing cultural resources, then the structure shall be reviewed for consistency with the GMA Guidelines in Part I, Chapter 2: Cultural Resources.

   Luciano Legnini, U.S. Forest Service Archeologist, reviewed the land use application and determined in a Cultural Resources Survey Determination letter, dated March 23, 2026, that pursuant to Existing Uses Guideline 3(F)(2)(b) in the Management Plan, neither a Cultural Resource Reconnaissance Survey nor a historical survey is required because the proposed use is to replace existing structures destroyed by a disaster.

4. 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.

5. 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:

The proposed development is consistent with Existing Uses Guideline 3(F)(2) that protects Cultural Resources in the Management Plan for the replacement of existing structures destroyed by disaster.

D. NATURAL RESOURCES

1. The proposed development must only meet the criteria identified in Existing Uses Guideline 3 in the Management Plan which allows the replacement of an existing structure destroyed by disaster. There are no guidelines for natural resources.

Natural Resources Conclusion:

The proposed development is consistent with Commission Rule 350-082-200(4) that allows the replacement of existing structures destroyed by disaster. Therefore, the proposed development is consistent with the rules in Commission Rule 350-082, Sections 0640 through 0690, that protect natural resources in the National Scenic Area.

E. RECREATION RESOURCES

1. The proposed development must only meet the criteria identified in Existing Uses Guideline 3 in the Management Plan which allows the replacement of an existing structure destroyed by disaster. There are no guidelines for the protection of recreation resources in Existing Uses Guideline 3 in the Management Plan and there are no recreation sites adjacent or nearby the subject parcel.

Recreation Resources Conclusion:

The proposed development is consistent with Existing Uses Guideline 3(F) in the Management Plan that allows the replacement of existing structures destroyed by disaster.

F. TREATY RIGHTS PROTECTION

1. The proposed development must only meet the criteria identified in Existing Uses Guideline 3 in the Management Plan which allows the replacement of an existing structure destroyed by disaster.

2. Existing Uses Guideline 3(H) in the Management Plan states:

   An application for a replacement structure that complies with guidelines 3.B through 3.F above shall be reviewed using the Procedural Guidelines for the expedited development review process and Resource and Treaty Rights Protection Guideline 2.B for the expedited development review process.

   Procedural Guidelines 2(B) for Expedited Development Review Processes in the Management Plan states that:

   Reviewing agencies shall allow the tribal governments, the Gorge Commission, and the Forest Service at least 10 days from the date a notice is sent to submit written comments on the proposed development.

   Consistent with Procedural Guidelines 2(B) for Expedited Development Review Processes in the Management Plan and corresponding Commission Rule 350-082-0120(2), notice of the proposed development was provided to the tribal governments on April 20, 2026.

Treaty Rights Conclusion:

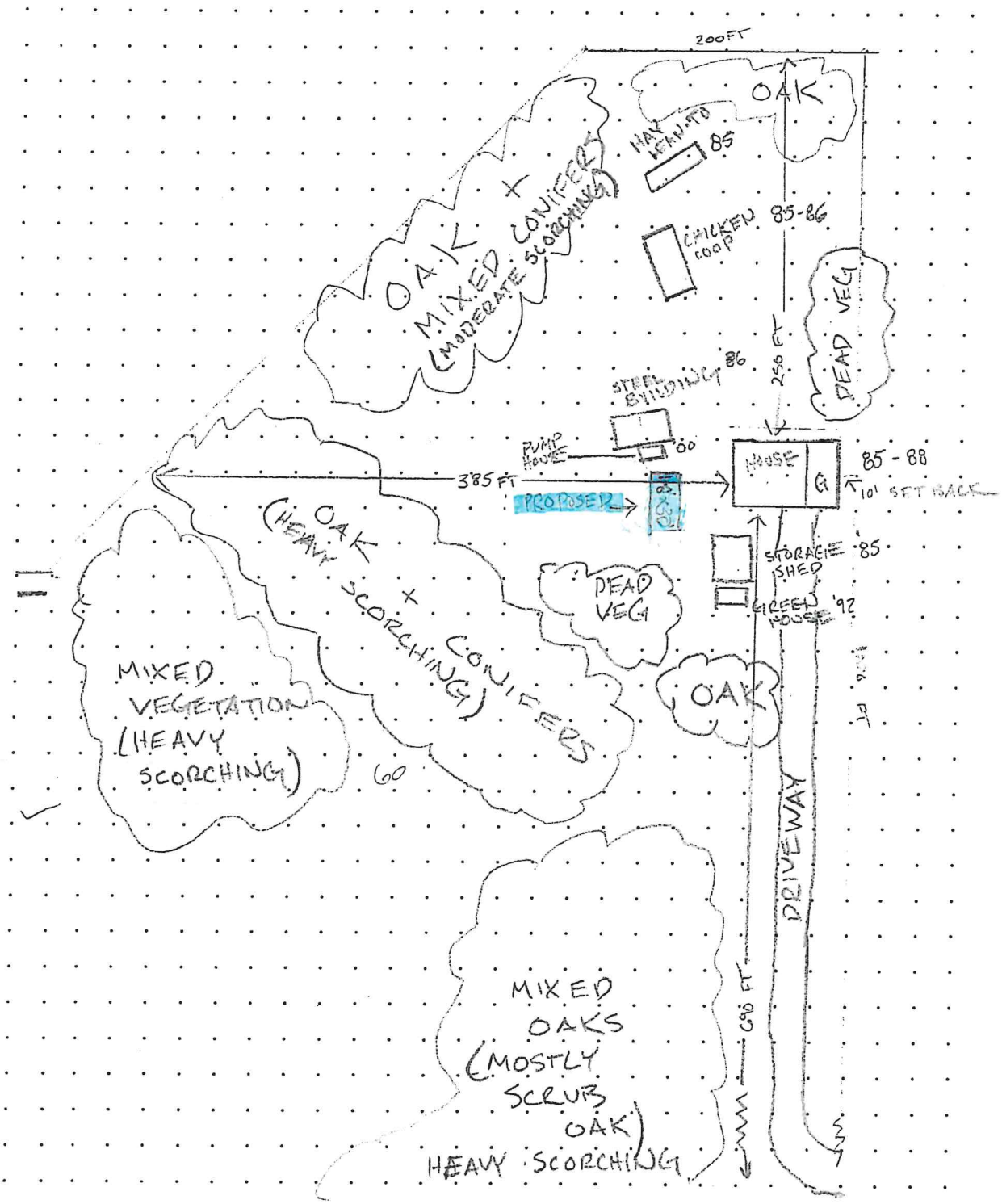
The proposed development is consistent with the guidelines Existing Uses Guideline 3 in the Management Plan which allows the replacement of an existing structure destroyed by disaster

BG
FIND0007.26

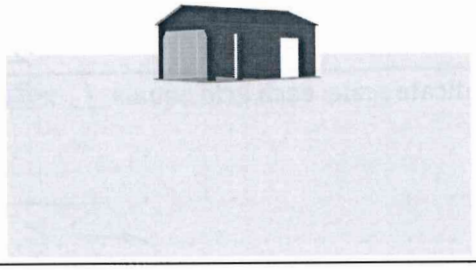
APPROVED
KW

Site Plan

(Indicate scale: each grid equals 1 x ~~25~~ 25 feet)



BUILDING VIEW



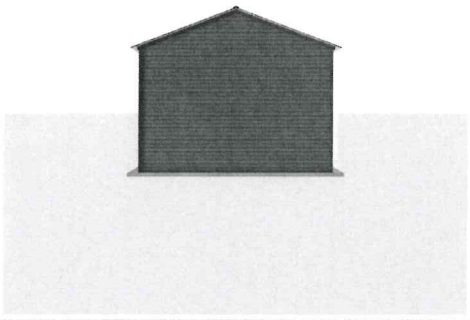
FRONT



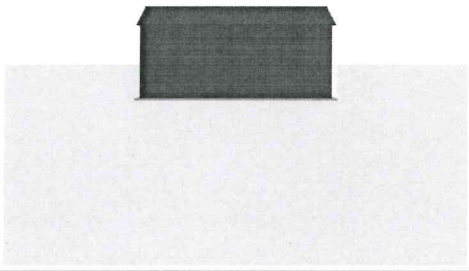
RIGHT

APPROVED

BUILDING VIEW



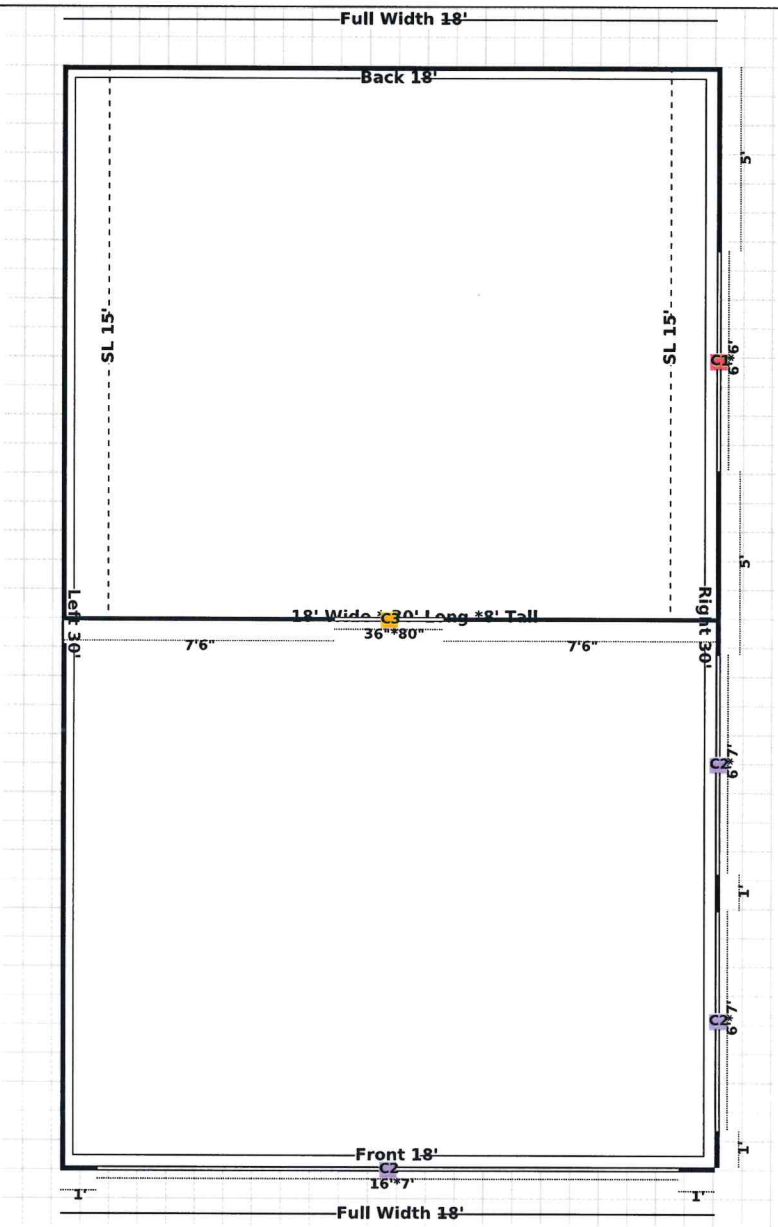
BACK



LEFT

APPROVED

2D DRAWING-1



APPROVED

KW

LEGENDS

C1 Garage Door | C2 Garage Door Frameout | C3 Walk in Door | C4 Walk in Door Frameout | C5 Windows | C6 Windows Frameout | C7 Open Wall

C8 Close Wall | C9 Distance | C10 Storage Length (Utility) | C Cupola

ROOFING AND SIDING COLORS

COAST TO COAST CARPORTS, INC. OFFERS 17 DIFFERENT COLOR OPTIONS THAT YOU CAN CHOOSE FROM, MAKING IT EASIER TO MATCH THE SURROUNDINGS.

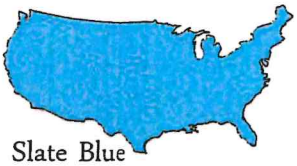


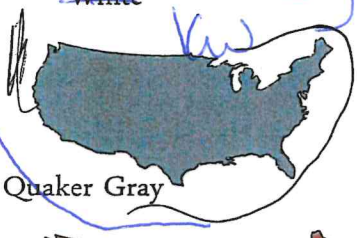
APPROVED

White


Black

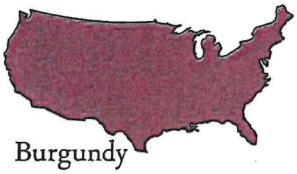

Evergreen

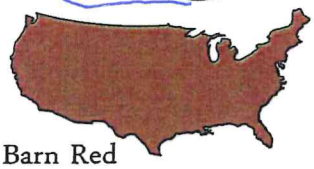

Slate Blue

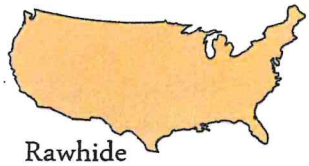

Quaker Gray


Pewter Gray

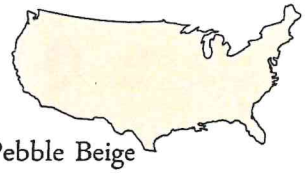

Earth Brown


Burgundy


Barn Red


Rawhide


Clay

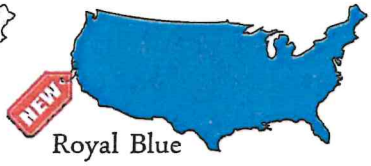

Pebble Beige



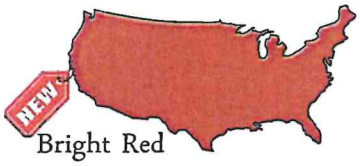
Sandstone



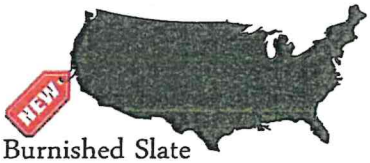
Galvalume



Royal Blue



Bright Red

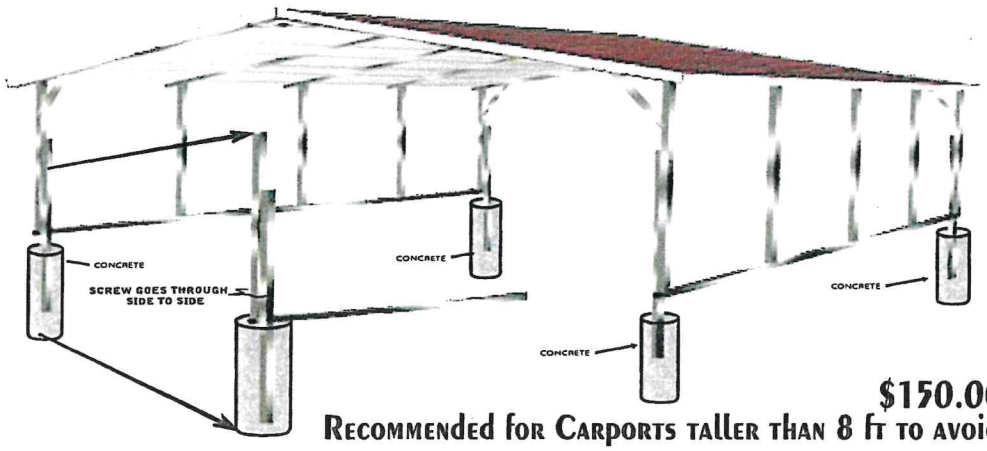


Burnished Slate

COLORS MAY VARY SLIGHTLY

Optional Ground Concrete Support

NOTE: This is not an anchor.



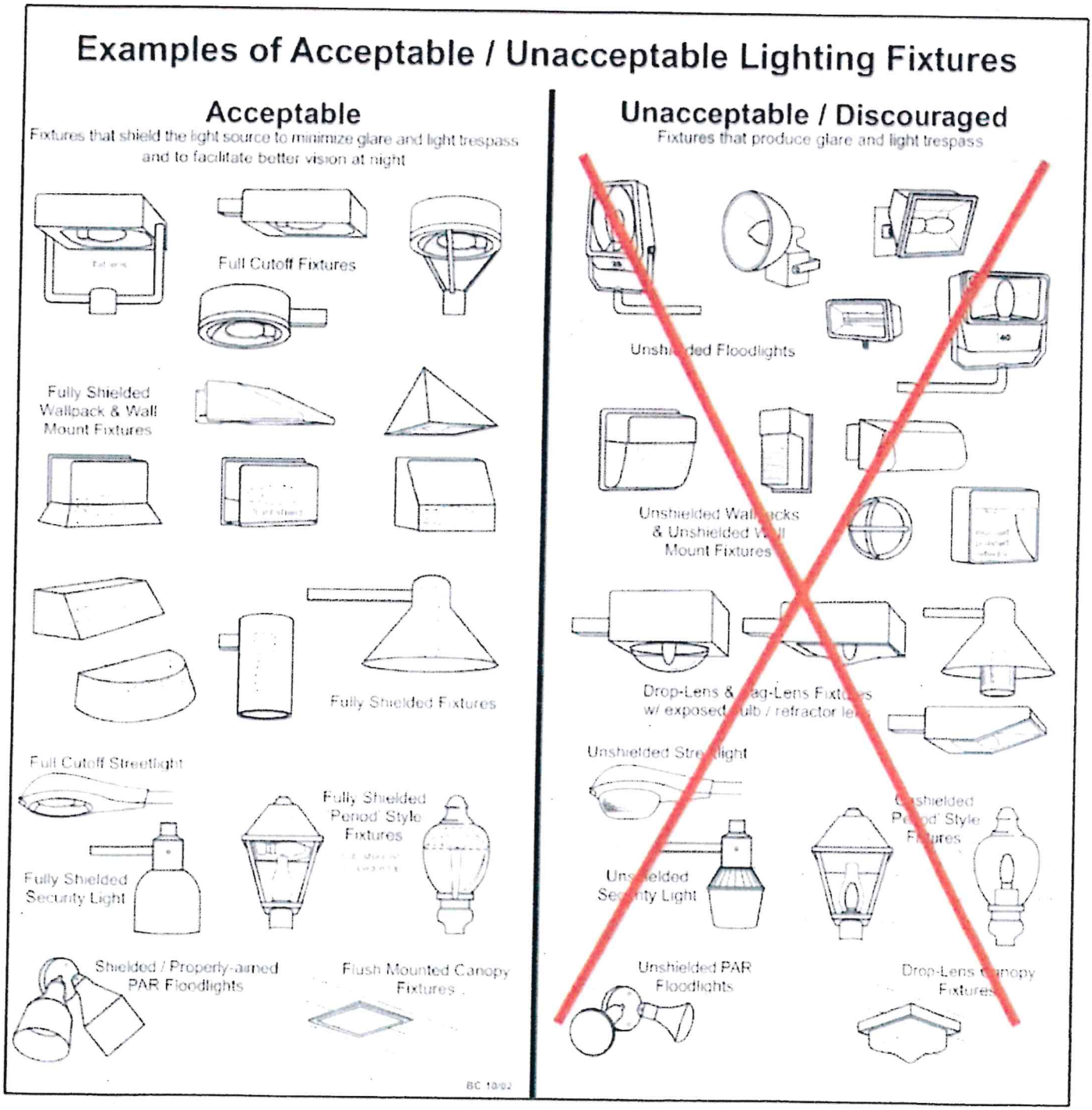
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Recommended for Carports taller than 8 ft to avoid sway.

NOTE: If you are needing special drawings or wet stamped drawings for your building, there will be an additional charge.
NOTE: Site-Specific drawings required on 13' or taller at additional cost.



Source: James Lowenthal: Light Pollution (smith.edu)