

NOTICE OF NSA DECISION



www.multco.us/landuse ■ Email: land.use.planning@multco.us ■ Phone: (503) 988-3043

Case File: T2-2025-0065

Applicant: Adrian Leech

Proposal: Request for a National Scenic Area (NSA) Site Review to alter an existing single-family dwelling by enlarging a window and alter an existing accessory building by filling in two garage doors with exterior walls.

Note: This application request was originally submitted under land use case T2-2025-0040 as an NSA Expedited Review. Comment was received that the proposed development is not eligible for expedited review.

Location: 28528 E Hist Columbia River Hwy, Troutdale

Property ID # R341499

Map, Tax lot: 1S4E06BC -01400

Alt. Acct. # R994060760

Base Zone: Gorge General Residential (GGR-5)

Overlays: Flood Hazard (FH)

Key Viewing Areas: Larch Mountain Road, Historic Columbia River Highway (including the Historic Columbia River Highway State Trail), Sandy River

Landscape Setting: Rural Residential

Decision: Approved with Conditions

This decision is final at the close of the appeal period, unless appealed. The deadline for filing an appeal is Monday, February 9, 2026 at 4:00 pm.

Issued by:

A handwritten signature in black ink, appearing to read "Rithy Khut", written over a horizontal line.

Digitally signed by Rithy Khut
DN: cn=Rithy Khut, o=Multnomah County,
ou=Department of Community Services,
email=rithy.khut@multco.us, c=US

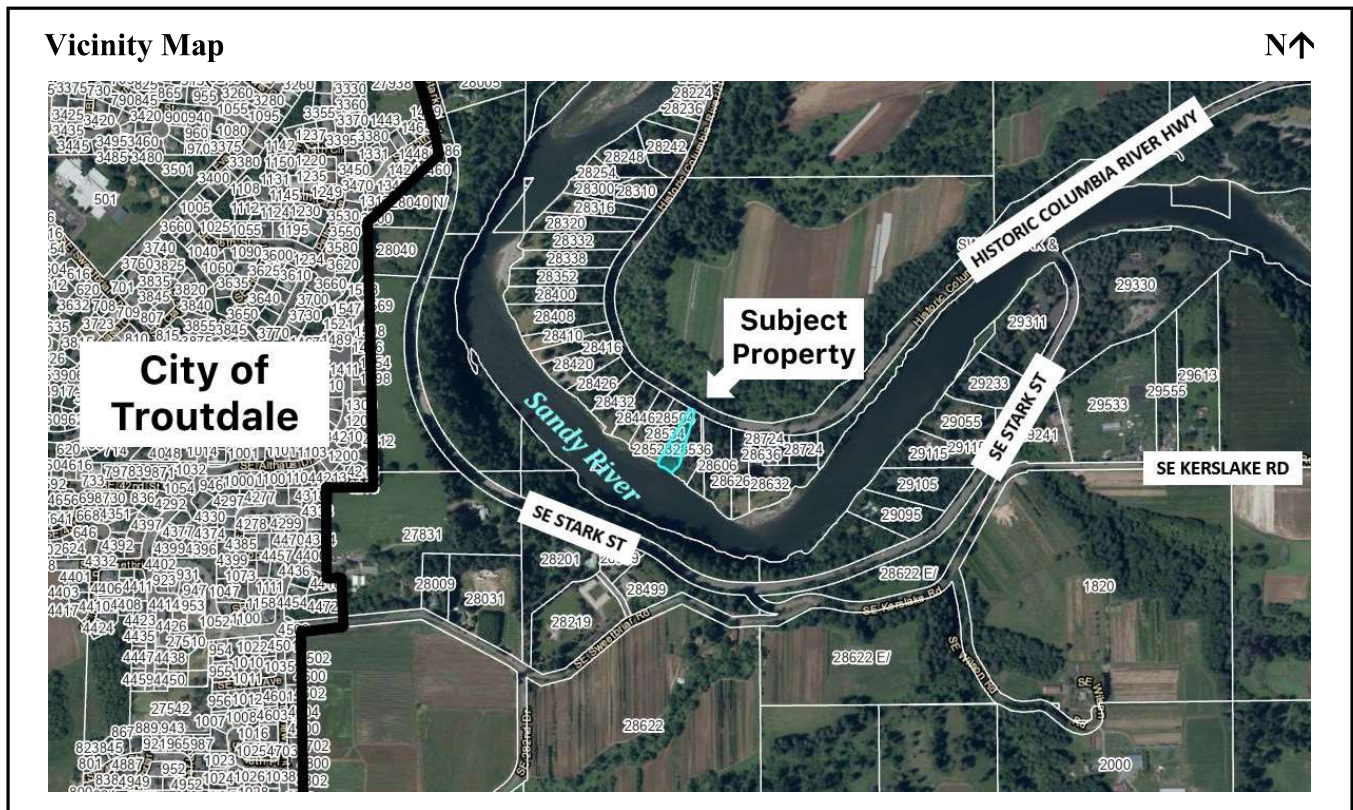
Rithy Khut, Senior Planner

For: Megan Gibb,
Planning Director

Date: Monday, January 26, 2026

Opportunity to Review the Record: The complete case file and all evidence associated with this application is available for review by contacting LUP-comments@multco.us. Paper copies of all documents are available at the rate of \$0.71/page.

Opportunity to Appeal: The appeal form is available at www.multco.us/landuse/application-materials-and-forms. Email the completed appeal form to LUP-submittals@multco.us. An appeal requires a \$250.00 fee and must state the specific legal grounds on which it is based. This decision is not appealable to the Columbia River Gorge Commission until all local appeals are exhausted.



Applicable Approval Criteria:

Multnomah County Code (MCC): General Provisions: MCC 38.0015 Definitions, MCC 38.0030 Existing Uses and Discontinued Uses, MCC 38.0110 Tribal Treaty Rights and Consultation

Administration and Procedures: MCC 38.0560 Code Compliance and Applications

Gorge General Residential (GGR-5): MCC 38.3025(A)(1) Review Uses - One single-family dwelling per legally created and existing parcel..., MCC 38.3025(A)(3) Review Uses - Accessory building(s)..., MCC 38.3090 Access

NSA Site Review Criteria: MCC 38.7035 GMA Scenic Review Criteria, MCC 38.7045 GMA Cultural Resource Review Criteria, MCC 38.7053 GMA Water Resources Review Criteria, MCC 38.7065 GMA Wildlife Review Criteria, MCC 38.7070 GMA Rare Plant Review Criteria, MCC 38.7080 GMA Recreation Resource Review Criteria

Copies of the referenced Multnomah County Code sections are available by contacting our office at (503) 988-3043 or by visiting our website at <https://multco.us/landuse/zoning-codes/> under the link **Chapter 38: Columbia River Gorge National Scenic Area**

Conditions of Approval

The conditions listed are necessary to ensure that approval criteria for this land use permit are satisfied. Where a condition relates to a specific approval criterion, the code citation for that criterion follows in parenthesis.

1. **Permit Expiration** – This land use permit shall expire as follows:

- a. Within **two (2) years** of the date of the final decision when construction has not commenced. [MCC 38.0690(B)]
 - i. For the purposes of 1.a, commencement of construction shall mean actual construction of the foundation or frame of the approved structure.
 - ii. For purposes of 1.a, notification of commencement of construction shall be given to Multnomah County Land Use Planning Division a minimum of seven (7) days prior to the date of commencement. Notification shall be sent via email to LUP-submittals@multco.us with the case no. T2-2025-0065 referenced in the subject line. [MCC 38.0660(A)]
- b. Within **two (2) years** of the date of commencement of construction when the structure has not been completed. [MCC 38.0690(B)]
 - i. For the purposes of 1.b, completion of the structure shall mean completion of the exterior surface(s) of the structure and compliance with all conditions of approval in the land use approval.
 - ii. For purposes of 1.b, the property owner shall provide building permit status in support of completion of exterior surfaces of the structure and demonstrate compliance with all conditions of approval. The written notification and documentation of compliance with the conditions shall be sent to LUP-submittals@multco.us with the case no. T2-2025-0065 referenced in the subject line. [MCC 38.0660(A)]

Note: Expiration of the permit is automatic. Failure to give notice of expiration shall not affect the expiration of this approval. The property owner may request one (1) 12-month extension to the timeframe within which this permit is valid, as provided under MCC 38.0700, as applicable. The request for a permit extension must be submitted prior to the expiration of the approval period. [MCC 38.0700]

2. Approval of this land use permit is based on the submitted written narrative(s) and plan(s). No work shall occur under this permit other than that which is specified within these documents. It shall be the responsibility of the property owner(s) to comply with these documents and the limitations of approval described herein. [MCC 38.0660(B)]
3. **When submitting Building Plans for Zoning Review**, the property owner(s) or their representative shall:
 - a. Acknowledge in writing that they have read and understand the conditions of approval and intend to comply with them. A Letter of Acknowledgement has been provided to assist you. The signed document shall be submitted and uploaded when submitting Building Plans for Zoning Review. [MCC 38.0660(A) & (B)]

- b. Submit final design plans of the single-family dwelling and accessory building.
 - i. The exterior surfaces of the dwelling and accessory building shall be as described and shown in Exhibits A.2, A.4 through A.8, and A.10. The exterior lighting on the accessory building shall be as described and shown in Exhibits A.6 and A.7. [MCC 38.7035(B)(1)-(2) and (B)(8)-(10)]
 - 1. Any changes to the final design plan of the exterior of the single-family or accessory building shall meet the recommendations of the *Building in the Scenic Area: Scenic Resources Implementation Handbook*.
 - a. If changes to the materials used for the exterior are proposed the materials shall be composed of non-reflective materials or materials with low reflectivity.
 - b. If changes to the exterior colors of the dwelling are proposed the color shall match Row A, B, or C in the *Scenic Resources Implementation Handbook*.
 - 2. Any changes to the final exterior lighting plan of the accessory building shall be sited in a location that prevents the lights from being highly visible from Key Viewing Areas and from noticeably contrasting with the surrounding landscape. The lighting fixture shall be directed downward, limited in intensity, shielded, and hooded.
 - a. If changes to the exterior lighting figure are proposed, the lighting fixture shall be directed downward, limited in intensity, shielded, and hooded.

Note: Land Use Planning must sign off on and stamp the building plans before you can go to the Building Department.

4. **During construction**, the property owner(s) or their representative shall:

- a. Put into action the following procedures, if any Cultural Resources and/or Archaeological Resources are located or discovered on the property during this project, including but not limited to finding any evidence of historic campsites, old burial grounds, implements, or artifacts. Additionally, all survey and evaluation reports and mitigation plans shall be submitted to the Planning Director and the SHPO. Native American tribal governments shall also receive a copy of all reports and plans if the cultural resources are prehistoric or otherwise associated with Native Americans.:
 - i. Halt Construction - All construction activities within 100 feet of the discovered cultural resource shall cease. The cultural resources shall remain as found; further disturbance is prohibited.
 - ii. Notification - The project applicant shall notify the County Planning Director and the Gorge Commission within 24 hours of the discovery. If the cultural resources are prehistoric or otherwise associated with Native Americans, the project applicant shall also notify the Native American tribal governments within 24 hours. Procedures required in MCC 38.7045(L) shall be followed.
 - iii. Survey and Evaluation - The Gorge Commission will survey the cultural resources after obtaining written permission from the landowner and appropriate permits from Oregon State Historic Preservation Office (SHPO) (see ORS 358.905 to 358.955). It will gather enough information to evaluate the significance of the

cultural resources. The survey and evaluation will be documented in a report that generally follows the standards in MCC 38.7045(C)(2) and MCC 38.7045(E).

- iv. Mitigation Plan - Mitigation plans shall be prepared according to the information, consultation, and report standards of MCC 38.7045(J). Construction activities may recommence when the conditions in the mitigation plan have been executed. [MCC 38.7050(H)]
- b. Put into action the following procedures, if human remains are discovered during excavation or construction (human remains means articulated or disarticulated human skeletal remains, bones, or teeth, with or without attendant burial artifacts):
 - i. Halt Activities - All survey, excavation, and construction activities shall cease. The human remains shall not be disturbed any further.
 - ii. Notification - Local law enforcement officials, the Multnomah County Planning Director, the Gorge Commission, and the Native American tribal governments shall be contacted immediately.
 - iii. Inspection - The State Medical Examiner shall inspect the remains at the project site and determine if they are prehistoric/historic or modern. Representatives from the Indian tribal governments shall have an opportunity to monitor the inspection.
 - iv. Jurisdiction - If the remains are modern, the appropriate law enforcement officials will assume jurisdiction and the cultural resource protection process may conclude.
 - v. Treatment - Prehistoric/historic remains of Native Americans shall generally be treated in accordance with the procedures set forth in Oregon Revised Statutes, Chapter 97.740 to 97.760.
 - vi. If the human remains will be reinterred or preserved in their original position, a mitigation plan shall be prepared in accordance with the consultation and report standards of MCC 38.7045(I).
 - vii. The plan shall accommodate the cultural and religious concerns of Native Americans. The cultural resource protection process may conclude when the conditions set forth in the standards of MCC 38.7045(J) are met and the mitigation plan is executed. [MCC 38.7050(H)]

Note: Land Use Planning must sign off on the building plans before you can go to the Building Department. When ready to submit Building Plans for Zoning Review, complete the following steps:

1. Read your land use decision, the conditions of approval and modify your plans, if necessary, to meet any condition that states, “When submitting Building Plans for Zoning Review...” Be ready to demonstrate compliance with the conditions.
2. Visit <https://www.multco.us/landuse/submitting-building-plan> for instructions regarding the submission of your building plans for zoning review and review of conditions of approval. Please ensure that any items required under, “When submitting Building Plans for Zoning Review...” are ready for review. Land Use Planning collects additional fees at the time of zoning review.

Once you have obtained an approved zoning review, application for building permits may be made with the City of Gresham.

Notice to Mortgagee, Lien Holder, Vendor, or Seller:

ORS Chapter 215 requires that if you receive this notice it must be promptly forwarded to the purchaser.

Findings of Fact

FINDINGS: Written findings are contained herein. The Multnomah County Code (MCC) criteria and Comprehensive Plan Policies are in **bold** font. Staff analysis and comments are identified as ‘**Staff:**’ and address the applicable criteria. Staff comments may include a conclusionary statement in *italic*.

1.0 Project Description:

Staff: Request for a National Scenic Area (NSA) Site Review to alter an existing single-family dwelling by enlarging a window and alter an existing accessory building by filling in two garage doors with exterior walls.

This application request was originally submitted under land use case T2-2025-0040 as an NSA Expedited Review. Comment was received that the proposed development is not eligible for expedited review.

2.0 Property Description & History:

Staff: This application is for 28528 E Hist Columbia River Hwy, Troutdale (“subject property”) The subject property is located on the south side of East Historic Columbia River Highway (“HCRH”) in unincorporated east Multnomah County outside of Metro’s Urban Growth Boundary (UGB) within the Columbia River Gorge National Scenic Area (NSA). The subject property is zoned Gorge General Residential (GGR-5) and has one overlay, Flood Hazard (FH).

The property is occupied by a single-family dwelling with an attached garage, covered patio, covered porch, and deck according to the County Assessor. The Assessor also lists a detached garage. The dwelling was first assessed in 2009 and the property is approximately 42,689 sq. ft. (0.98 acres) in size. Aerial photos from 2025 show what appears to be two (2) buildings/structures (Exhibit B.3). These are the previous land use/building permits associated with the property.

Permit No.	Date	Description
#48528	06/06/1969	New residence/attached garage
T2-06-129	08/13/2007	NSA Site Review, Property Line Adjustment, Non-Hearing Major Variance, and Minor Variance for a replacement dwelling and after-the-fact review of an incorrectly implemented Property Line Adjustment.
N/A	09/11/2007	Zoning Plan Review for construction of a replacement dwelling with attached garage
T1-07-019	09/12/2007	Grading and Erosion Control permit for replacement dwelling.
T2-2025-0040	N/A	NSA Expedited Review for an addition to alter the existing accessory building and repair to replace an existing window on the single-family dwelling.

3.0 Public Comment:

Staff: Staff mailed a notice of application and invitation to comment on the proposed application to the required parties pursuant to MCC 38.0530 (Exhibit C.3). Staff did receive comments during the 21-day comment period and did receive comments regarding Cultural Resources during the 30-day comment period.

3.1 Letter from Steven D. McCoy, Staff Attorney, Friends of the Columbia Gorge (Exhibit D.1)

Staff: Steven D. McCoy submitted a letter on November 12, 2025 on behalf of the Friends of the Columbia Gorge (“Friends”). The letter contained substantive written comment requesting that the Expedited NSA Review be received under a full National Scenic Area Review.

3.2 Letter from Steven D. McCoy, Staff Attorney, Friends of the Columbia Gorge (Exhibit D.2)

Staff: Steven D. McCoy submitted a letter on December 11, 2025 on behalf of the Friends of the Columbia Gorge (“Friends”). The letter contained comments intended to identify application requirements, procedural requirements, resource protection standards, and provide recommendations to the County and the public regarding legal requirements.

3.3 Cultural Resource Survey Determination from Luciano Legnini, Archaeologist on behalf of the United States Department of Agriculture: Forest Service (“USFS”) - Columbia River Gorge National Scenic Area (Exhibit D.3)

Staff: Luciano Legnini sent a Cultural Resource Survey Determination on behalf of the USFS on November 19, 2025. The Survey stated that, “A Cultural Resource Survey is: Not Required” and “A Historic Survey is: Not Required.”

4.0 Code Compliance and Applications Criteria:

4.1 § 38.0560 CODE COMPLIANCE AND APPLICATIONS.

Except as provided in subsection (A), the County shall not make a land use decision approving development, including land divisions and property line adjustments, or issue a building permit or zoning review approval of development or any other approvals authorized by this code for any property that is not in full compliance with all applicable provisions of the Multnomah County Code and/or any permit approvals previously issued by the County.

(A) A permit or other approval, including building permit applications, may be authorized if:

* * *

Staff: This standard provides that the County shall not make a land use decision approving development for a property that is not in full compliance with County Code or previously issued County approvals, except in the following instances: approval will result in the property coming into full compliance, approval is necessary to protect public safety, or the approval is for work related to or within a valid easement.

This standard codified in the Columbia River Gorge National Scenic Area Code chapter related to land use application procedures and, by its terms, expressly applies to the application review process. Importantly, a finding of satisfaction of this standard does not mean that a property is in full compliance with the Zoning Code and all prior permit approvals (and, accordingly, does not preclude future enforcement actions relating to uses and structures existing at the time the finding is made). Instead, a finding of satisfaction of this standard simply means that there is not substantial evidence in the record affirmatively establishing one or more specific instances of noncompliance.

For purposes of the current application, there are no known open compliance cases associated with the subject property, and there is no evidence in the record of any specific instances of noncompliance on the subject property. *Criterion met.*

5.0 Parcel Criteria:

5.1 § 38.0015 DEFINITIONS

Parcel:

- (a) Any unit of land legally created by a short division, partition, or subdivision, that was legally recognized under all state laws and local ordinances in effect on November 17, 1986. A unit of land that is eligible for consolidation as provided in the Management Plan shall not be considered a parcel.
- (b) Any unit of land legally created and separately described by deed, or sales contract, or record of survey prior to November 17, 1986, if the unit of land complied with all planning, zoning, and land division ordinances or regulations applicable at the time of creation and up through November 16, 1986.
- (c) A unit of land legally created and separately described by deed or sales contract after November 17, 1986 if the unit was approved under the Final Interim Guidelines or a land use ordinance consistent with the Management Plan, or by the U.S. Forest Service Office prior to the Final Interim Guidelines.
- (d) A unit of land shall not be considered a separate parcel simply because it:
 - 1. Is a unit of land created solely to establish a separate tax account;
 - 2. Lies in different counties;
 - 3. Lies in different sections or government lots;
 - 4. Lies in different zoning designations; or
 - 5. Is dissected by a public or private road.

Staff: To qualify as a Parcel, the property when created or reconfigured must meet the definition above and demonstrate that the property satisfied all applicable zoning laws and satisfied all applicable land division laws. The property was found to be a Parcel in land use case no. T2-06-129 (Exhibit B.6). As found, the property was legally created and separately described by deed prior to November 17, 1986 and complied with all planning, zoning, and land division ordinances or regulations applicable at the time of creation. The property has not been reconfigured since issuance of T2-06-129; therefore, the property remains a “Parcel” as defined in MCC 38.0015. *Criterion met.*

6.0 Existing Use Criteria:

6.1 § 38.0030 EXISTING USES AND DISCONTINUED USES

(A) Right to Continue Existing Uses and Structures: Any existing use or structure may continue so long as it is used in the same manner and for the same purpose, except as otherwise provided.

* * *

(D) Changes to Existing Uses and Structures: Except as otherwise provided, any change to an existing use or modification to the exterior of an existing structure shall be subject to review and approval pursuant to this Management Plan.

* * *

Staff: The proposal includes two (2) existing buildings: a dwelling and an accessory building. The buildings have not been discontinued as they are still present; however, the applicant is proposing changes to the existing structures that modify the exterior of both buildings. As required above, the modification to the exterior of an existing structure is subject to review and approval to this Management Plan, including, but not limited to, guidelines for land use designations and scenic, cultural, recreation and natural resources. The buildings, however are not subject to compliance

with setbacks or buffers as no alteration of the footprint of the buildings are proposed. Applicable policies, guidelines, and Multnomah County Code requirements are discussed below.

7.0 Gorge General Residential (GGR-5) Criteria:

7.1 § 38.3025 REVIEW USES

(A) The following uses may be allowed on lands designated GGR, pursuant to MCC 38.0530 (B) and upon findings that the NSA Site Review standards of MCC 38.7000 through 38.7085 have been satisfied:

(1) One single-family dwelling per legally created and existing parcel.

(a) If the subject parcel is located adjacent to lands designated GGA or GGF, the use shall comply with the buffer requirements of MCC 38.0060; and

(b) If the subject parcel is located is adjacent to lands designated GGF, the placement of a dwelling shall also comply with the fire protection standards of MCC 38.7305.

Staff: The applicant is requesting to alter an existing single-family dwelling by enlarging a window. As discussed in Section 5.0 the dwelling is located on a legally created and existing parcel. The applicant does not to demonstrate compliance with MCC 38.0060 as the property is not located adjacent to lands designated GGA. The dwelling will also be required to obtain an NSA Site Review to ensure the standards of MCC 38.7000 through 38.7085 are satisfied. Those standards are discussed in Section 8.0.

(3) Accessory building(s) larger than 200 square feet in area or taller than 10 feet in height for a dwelling on any legal parcel are subject to the following additional standards:

(a) The combined footprints of all accessory buildings on a single parcel shall not exceed 1,500 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 height of any individual accessory building shall not exceed 24 feet.

Staff: The applicant is requesting to alter an existing accessory building by filling in two garage doors with exterior walls. The existing accessory building's footprint and height will not be changed from the previous approval in 2007; therefore subsection (a) and (b) are not applicable. However, the alteration is subject to the NSA Site Review standards which are discussed in Section 8.0. *As conditioned, criteria met.*

7.2 § 38.3090 ACCESS

Any lot in this district shall abut a street or shall have other access determined by the approval authority to be safe and convenient for pedestrians and passenger and emergency vehicles.

Staff: The subject property abuts HCRH. *Criterion met.*

8.0 National Scenic Area (NSA) Site Review Criteria:

8.1 § 38.7035 GMA SCENIC REVIEW CRITERIA

The following scenic review standards shall apply to all Review and Conditional Uses in the General Management Area of the Columbia River Gorge National Scenic Area:

Staff: As discussed in Section 6.0 and 7.0, this application involves modifications to existing structures. Staff addresses relevant GMA Scenic Review Criteria below.

8.1.1 (A) All Review Uses and Conditional Uses:

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

Staff: The development to alter the existing single-family dwelling and accessory building will be in areas of the property that have already been altered (Exhibit A.7). As the development will occur on existing buildings, the existing topography will be retained as no grading activities will be required. *Criterion met.*

(2) New buildings and expansion of existing development shall be compatible with the general scale of similar buildings that exist nearby (e.g. dwellings to dwellings). For purposes of applying this standard, the term nearby generally means buildings within ¼ mile of the parcel on which development is proposed. New buildings that are 1,500 square feet or less are exempt from this requirement. Findings addressing this requirement shall include but are not limited to:

* * *

Staff: As previously discussed, the applicant is requesting to alter existing buildings. No new buildings or expansion of existing development will occur; therefore, these criteria are not applicable. *Criterion not applicable.*

(3) New vehicular access points to the Scenic Travel Corridors shall be limited to the maximum extent practicable, and access consolidation required where feasible.

Staff: The applicant is not requesting new vehicular access points to the HCRH, a Scenic Travel Corridor. The vehicular access point was constructed as early as 1969, when the property was developed with a new dwelling. *Criterion met.*

(4) Landowners shall be responsible for the proper maintenance and survival of any required vegetation.

Staff: As discussed below vegetation is not required to be retained; therefore, no conditions will be required that the landowners shall be responsible for the proper maintenance and survival newly planted vegetation. *Criterion not applicable.*

* * *

8.1.2 (B) All Review Uses and Conditional Uses topographically visible from Key Viewing Areas:

(1) Each development shall be visually subordinate to its setting as visible from Key Viewing Areas. New development shall be sited to achieve visual subordination from key viewing areas, unless the 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.

Staff: The development to alter existing buildings are in an area that are potentially topographically visible from the following KVAs: Larch Mountain Road, Historic Columbia River Highway (including the Historic Columbia River Highway State Trail), Sandy River. Therefore, the development will need to meet the “visually subordinate” standard. As defined, to meet the standard:

“The development must not noticeably contrast with the surrounding landscape, as viewed from a specified vantage point (generally a Key Viewing Area). Structures which are visually subordinate may be partially visible, but are not visually dominant in relation to their surroundings.”

The proposed alterations are potentially topographically visible from portions of the Historic Columbia River Highway (including the Historic Columbia River Highway State Trail) and Sandy River KVAs. However, it is not topographically visible from Larch Mountain Road, as the development is in the valley of the Sandy River, below the plateau of E Woodard Road, and more than 5.75 miles from the closest portion of Larch Mountain Road.

For the highway to the north and the Sandy River to the south, the development is not visible from the KVAs due to the location of the existing development on the property. The alteration of the dwelling being obscured by the massing of the rest of the dwelling. The alteration of the accessory building is also obscured from the north and south by the massing of the accessory building and the existing dwelling to the south. *Criterion met.*

(2) A determination of the potential visual impact of a new development or use shall include written findings addressing the following factors: the amount of area of the building site exposed to Key Viewing Areas, the degree of existing vegetation providing screening, the distance from the building site to the Key Viewing Areas it is visible from, the number of Key Viewing Areas it is visible from, and the linear distance along the Key Viewing Areas from which the building site is visible (for linear Key Viewing Areas, such as roads), and other factors the reviewing agency determines relevant in consideration of the potential visual impact. 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 priorities:

- (a) Screening by 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.**

Staff: As discussed previously and will be discussed an analysis of the potential visual impact has considered the factors as listed above. The development is potentially topographically visible from two KVAs, Historic Columbia River Highway (including the Historic Columbia River Highway State Trail) and Sandy River. The applicant has provided a narrative and plans describing and

showing siting and design consideration for the development (Exhibit A.2, A.4 through A.8, and A.10). In totality, the application materials show the proposed development will have a minor visual impact. *Criterion met.*

(3) Determination of potential visual effects and compliance with visual subordination policies shall include consideration of the cumulative effects of proposed developments.

Staff: The cumulative effects (i.e. the combined impacts of the past, present, and reasonably foreseeable future) of the proposed development on the visual effects and compliance with visual subordination is minor. The existing impacts of the past include an already built environment that includes a dwelling and accessory building. In the immediate vicinity, there are also dwellings, accessory buildings, and accessory structures. The proposed development is located on existing buildings. As this property is already developed, the impact of this development and potential future development are minor as there is little potential future development for this property. Additional development of other properties within the vicinity is also low as they are already developed. All these factors limit and minimize future impacts. *Criterion met.*

(4) In addition to the site plan requirements in MCC 38.0045 (A) applications for all buildings visible from key viewing areas shall include a description of the proposed building(s)' height, shape, color, exterior building materials, exterior lighting, and landscaping details (type of plants used; number, size, locations of plantings; and any irrigation provisions or other measures to ensure the survival of landscaping planted for screening purposes).

Staff: The narrative, plans, and designs for the alterations of the existing buildings have been provided as found in Exhibit A.2, A.4 through A.8, and A.10. *Criterion met*

(5) New development shall be sited using existing topography and existing vegetation as needed to achieve visual subordination from key viewing areas.

Staff: As discussed above, the development is potentially topographically visible from two KVAs. The development is designed and sited to using existing topography and vegetation to achieve visual subordination. The development on the property is sited using the existing buildings. No changes of topography or existing vegetation is necessary or required. *Criterion met.*

(6) Existing tree cover screening proposed development from key viewing areas shall be retained as specified in MCC 38.7035(C).

Staff: Current aerial photos show the property is heavily forested. The proposed development will not require any ground disturbance or tree removal; therefore, the existing tree cover will be retained. *Criterion met.*

(7) Driveways and buildings shall be designed and sited to minimize visibility of cut banks and fill slopes from Key Viewing Areas.

Staff: As previously discussed, the applicant is not proposing a new driveway or new buildings; therefore, this criterion is not applicable. *Criterion not applicable.*

(8) The exterior of buildings on lands seen 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.

Staff: The applicant provided a narrative, building plan, and material samples to show that exterior of the dwelling and accessory building. The exterior surfaces of the dwelling will be cedar bevel siding with cedar trim as described and shown in Exhibit A.10. The exterior surfaces of the accessory building will be concrete and rough sawn plywood siding described and shown in Exhibit A.5.

Further, the plans show no continuous surfaces of glass windows with the rendering showing low-profile buildings that is a mixture of siding, windows, and doors. A condition will be required that when submitting building plans for Zoning Plan Review, the proposed building plan be finalized demonstrating compliance with the above. *As conditioned, criterion met.*

(9) Any exterior lighting shall be directed downward and 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. Shielding and hooding materials shall be composed of non-reflective, opaque materials.

Staff: The applicant provided a description of the exterior lighting. The exterior lighting located on the accessory building will be swapped out for new lighting fixtures (Exhibit A.6 and A.7). The exterior light will be Henry Small Dark Sky Friendly Outdoor Sconce lights. As designed the proposed light fixture is shielded and hooded. A condition will be required that when submitting building plans for Zoning Plan Review, the proposed lighting plan be finalized demonstrating compliance with the above. *As conditioned, criterion met.*

(10) Unless expressly exempted by other provisions in this chapter, 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.

Staff: The exterior colors of the existing buildings are described and show in Exhibit A.5, A.6, A.10. The exterior colors will match the existing color and staining of the existing buildings. The proposed color match the dark earth tones found in the *Scenic Resources Implementation Handbook*. A condition will be required that when submitting building plans for Zoning Plan Review, the proposed color plan be finalized demonstrating compliance with the above. *As conditioned, criterion met.*

* * *

(14) The following standards shall apply to new landscaping used to screen development from key viewing areas:

* * *

Staff: As discussed above in MCC 38.7035(B)(1), (2), (5) and (6), the potential visual impact of the new development will not require new landscaping to screen the development from the KVAs to the north and south. The applicant is utilizing various other means to make the development visually subordinate from the KVAs; therefore, these criteria are not applicable. *Criteria not applicable.*

(15) Conditions regarding new landscaping or retention of existing vegetation for new developments on land designated GGF-80, GGF-40 and GGF-20 shall meet both scenic guidelines and the fuel break requirements of MCC 38.7305(B).

Staff: As discussed above in Section 6.0, the subject property is not located on land designated GGF-80, GGF-40, or GGF-20; therefore, this criterion is not applicable. *Criterion not applicable.*

* * *

8.1.3 (C) All Review Uses and Conditional Uses within the following landscape settings, regardless of visibility from KVAs:

* * *

(3) Rural Residential

(a) Existing tree cover shall be retained as much as possible, except as is necessary for site development, safety purposes, or as part of forest management practices.

Staff: The alteration of the existing buildings is designed to retain the existing tree cover. No tree cover will be removed and no ground disturbance is proposed. *Criterion met.*

(b) In portions of this setting visible from Key Viewing Areas, the following standards shall be employed to achieve visual sub-ordination for new development and expansion of existing development:

- 1. Except as is necessary for site development or safety purposes, the existing tree cover screening the development from Key Viewing Areas shall be retained.**
- 2. At least half of any trees planted for screening purposes shall be species native to the setting or species identified in the Scenic Implementation Handbook as appropriate for the area.**
- 3. At least half of any trees planted for screening purposes shall be coniferous to provide winter screening.**

Staff: As previously discussed, the property is visible from nearby KVAs due to the topography of the area. The development is designed to retain the existing tree cover as no trees will be removed. Further the applicant is utilizing various other means to make the development visually subordinate from the KVAs; therefore, these criteria are not applicable. *As conditioned, criteria met.*

* * *

8.1.4 (D) All Review Uses and Conditional Uses within scenic travel corridors:

(1) For the purposes of implementing this section, the immediate foreground of a Scenic Travel Corridor shall include those lands within one-quarter mile of the edge of pavement of the Historic Columbia River Highway and I-84.

* * *

Staff: The property is located within one-quarter mile from the edge of pavement of the Historic Columbia River Highway. As the land is in the immediate foreground of the Scenic Travel Corridor the standards of MCC 38.7035(D)(2) through (7) are applicable; however, based on the proposal none of the standards are applicable. *Criteria met.*

8.2 § 38.7045 GMA CULTURAL RESOURCE REVIEW CRITERIA

8.2.1 (A) Cultural Resource Reconnaissance Surveys

Each proposed use or element of a proposed use within an application shall be evaluated independently to determine whether a reconnaissance survey is required; for example, an application that proposes a land division and a new dwelling would require a reconnaissance survey if a survey would be required for the dwelling.

(1) A cultural reconnaissance survey shall be required for all proposed uses, except:

* * *

(f) Proposed uses occurring in areas that have a low probability of containing cultural resources, except:

* * *

(2) A reconnaissance survey shall be required for all proposed uses within 500 feet of a known cultural resource, and all proposed uses within 100 feet of a high probability area, including those listed above in MCC 38.7045 (A) (1) (a) through (f). The Forest Service maintains a map of known cultural resources and a probability map. Both maps are confidential as required by the National Scenic Act, other federal law, and Oregon law.

* * *

Staff: Luciano Legnini sent an e-mail and a Cultural Resource Survey Determination on behalf of the USFS on November 19, 2025 (Exhibit D.3). The Survey stated that, “A Cultural Resource Survey is: Not Required” as the proposed development:

- Would occur on a site that has been determined to be located within a low probability zone
 - is not within 100 feet of a high probability zone
- Does not occur within 500 feet of a known archeological site.

Criteria met.

* * *

(4) A historic survey shall be required for all proposed uses that would alter the exterior architectural appearance of buildings and structures that are 50 years old or older, or compromise features of the surrounding area that are important in defining the historic or architectural character of the buildings or structures that are 50 years old or older.

Staff: Luciano Legnini sent an e-mail and a Cultural Resource Survey Determination on behalf of the USFS on November 19, 2025 (Exhibit D.3). The Survey stated that, “A Historic Survey is: Not Required” as the proposed development:

- Would not later the exterior architectural appearance of significant buildings and structures that are 50 years old or older
- Would not compromise features of the surrounding area that are important in defining the historic or architectural character of significant buildings or structures that are 50 years old or older

Criterion met.

8.2.2 (B) The cultural resource review criteria shall be deemed satisfied, except MCC 38.7045 (L) and (M), if:

(1) The project is exempted by MCC 38.7045 (A) (1), no cultural resources are known to exist in the project area, and no substantiated comment is received during the comment period provided in MCC 38.0530 (B).

* * *

Staff: The cultural resource review has been satisfied, as the project is exempted by MCC 38.7045(A)(1) above; therefore, these criteria are not applicable except for MCC 38.7045(L) and (M). Those criteria are required to be met as a condition. *As conditioned, criteria met.*

8.2.3 (L) Cultural Resources Discovered After Construction Begins

The following procedures shall be effected when cultural resources are discovered during construction activities, and shall be included as conditions of approval for all review uses. All survey and evaluation reports and mitigation plans shall be submitted to the Planning Director and SHPO. Tribal governments also shall receive a copy of all reports and plans if the cultural resources are precontact or otherwise associated with Native Americans.

* * *

Staff: A condition requires the property owner to follow the procedures of MCC 38.7045(L), if cultural resources are discovered during construction. *As conditioned, criteria met.*

8.2.4 (M) Discovery of Human Remains

The following procedures shall be used when human remains are discovered during a cultural resource survey or during construction, and shall be included as a condition of approval for all review uses.

* * *

Staff: A condition requires the property owner to follow the procedures of MCC 38.7045(M), if human remains are discovered during construction. *As conditioned, criteria met.*

8.3 § 38.7053 GMA WATER RESOURCES REVIEW CRITERIA

WATER RESOURCES: WETLANDS, STREAMS, PONDS, LAKES, AND RIPARIAN AREAS

* * *

Staff: Based on the United State Forest Service maps for wetlands and Department of State Lands Statewide Wetland Inventory Map, the property does contain wetlands and other water resources. However, the development is not located within a buffer zones as outlined in subsection (G); therefore, these criteria are not applicable. *Criteria not applicable.*

8.4 § 38.7065 GMA WILDLIFE REVIEW CRITERIA

Wildlife Habitat Site Review shall be required for any project within 1,000 feet of Priority Habitat and sensitive wildlife areas and sensitive wildlife sites (i.e., sites used by sensitive wildlife species). If Multnomah County discovers a new protected wildlife location during the review process, the County shall submit this information to the appropriate state agency to be updated in their species databases.

* * *

Staff: Based on the United State Forest Service maps for Sensitive Wildlife, there are no sensitive wildlife areas or sensitive wildlife sites within 1,000 feet of the property. *Criteria not applicable.*

8.5 § 38.7070 GMA RARE PLANT REVIEW CRITERIA

Rare Plant Site Review shall be required for any project within 1,000 feet of endemic plants and rare plant species.

* * *

Staff: Based on United State Forest Service maps for Sensitive Plants, there does not appear to be any endemic plants or sensitive plant species within 1,000 feet of the property. *Criteria not applicable.*

8.6 § 38.7080 GMA RECREATION RESOURCE REVIEW CRITERIA

The following uses are allowed, subject to compliance with MCC 38.7080 (E) and (F).

* * *

Staff: The property is located within the Recreation Intensity Class 2; however, the applicant is not proposing any recreation-based uses. *Criteria not applicable.*

9.0 Conclusion

Based on the findings and other information provided above, the applicant has carried the burden necessary for the National Scenic Area (NSA) Site Review to alter an existing single-family dwelling and alter an existing accessory building in the Gorge General Residential (GGR-5) zone. This approval is subject to the conditions of approval established in this report.

10.0 Exhibits

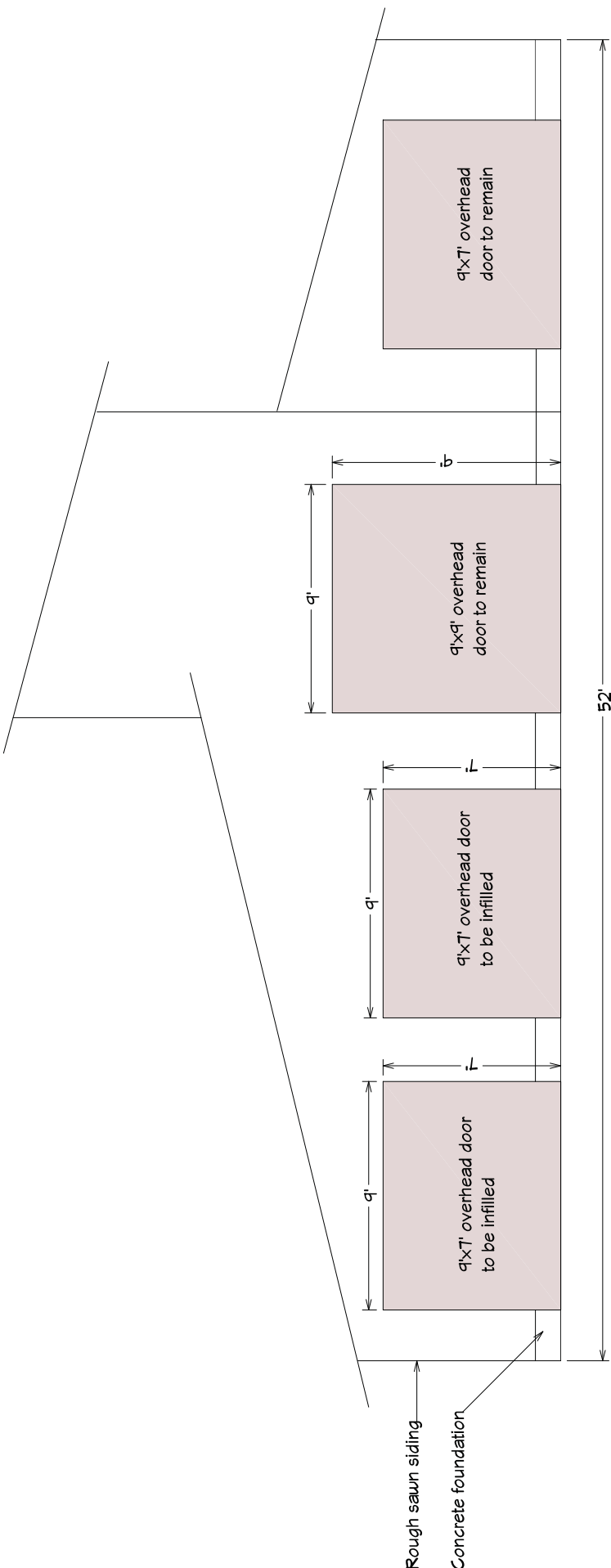
- ‘A’ Applicant’s Exhibits
- ‘B’ Staff Exhibits
- ‘C’ Procedural Exhibits
- ‘D’ Comments Received

Exhibits with an ‘*’ have been reduced in size and included with the mailed decision. All exhibits are available for digital review by sending a request to LUP-comments@multco.us.

Exhibit #	# of Pages	Description of Exhibit	Date Received / Submitted
A.1	2	Application Form	08/19/2025
A.2	6	NSA Expedited Review Additions & Accessory Uses Worksheet	08/19/2025
A.3	3	Site Plan and Building Elevations <ul style="list-style-type: none">▪ Site Plan▪ As Built Elevation▪ Proposed Elevation	08/19/2025
A.4	3	Revised Site Plan	08/19/2025

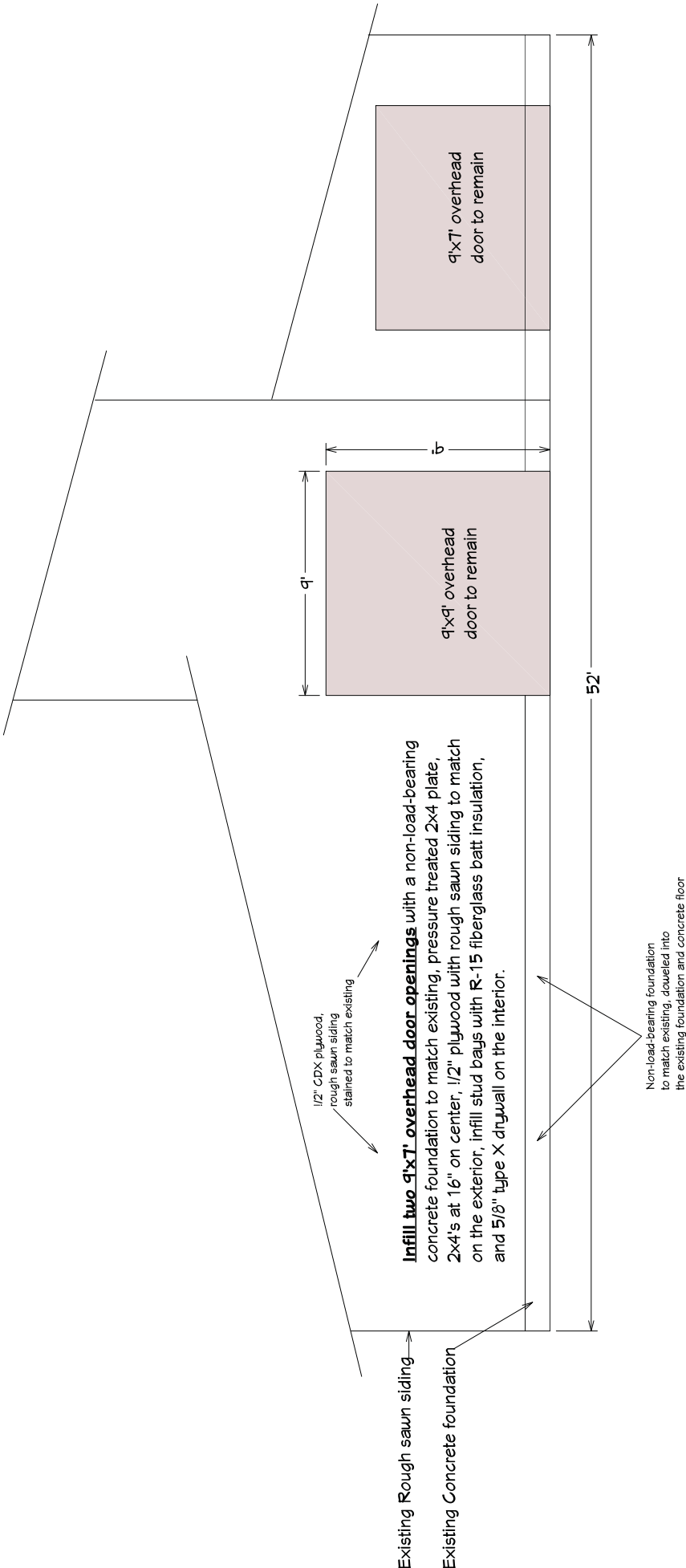
A.5*	2	Accessory Building Elevations Plans ▪ As Built Elevation ▪ Proposed Elevation	08/19/2025
A.6	5	Narrative in Response to Incomplete Letter	09/10/2025
A.7*	1	Revised Site Plan showing lighting locations	09/10/2025
A.8*	4	Single-family Dwelling Building Plans ▪ *Sheet S0.0 – Structural Notes ▪ *Sheet S0.1 – (E) Foundation Plan ▪ *Sheet S0.2 – Framing Plan ▪ Sheet S1.1 – Misc Details	10/17/2025
A.9	13	Single-family Dwelling Structural Calculations	10/17/2025
A.10*	1	Proposed Kitchen Window Elevation Plans	11/19/2025
‘B’	#	Staff Exhibits	Date
B.1	2	Assessment and Taxation Property Information for 1S4E06BC -01400 (Alt Acct #R994060760 / Property ID #R341499)	08/19/2025
B.2	1	Current Tax Map for 1S4E06BC	08/19/2025
B.3	1	Aerial Photo taken on October 13, 2025	01/16/2025
B.4	1	Record of Survey #21724	01/16/2025
B.5	1	Record of Survey #53761	01/16/2025
B.6	35	Land use case no. T2-06-129	01/16/2025
‘C’	#	Administration & Procedures	Date
C.1	15	Preliminary Decision	10/29/2025
C.2	1	Transfer of T2-2025-0040 NSA Expedited Review to T2-2025- 0065 NSA Site Review	11/14/2025
C.3	8	Opportunity to Comment	11/20/2025
C.4	26	Decision	01/26/2026
‘D’	#	Comments	Date
D.1	1	Letter from Steven D. McCoy, Staff Attorney, Friends of the Columbia Gorge	11/12/2025
D.2	6	Letter from Steven D. McCoy, Staff Attorney, Friends of the Columbia Gorge	12/11/2025
D.3	4	Cultural Resource Survey Determination submitted on behalf of USDA Forest Service: Columbia River Gorge National Scenic Area by Luciano Legnini, Archaeologist	11/19/2025

As Built East Elevation



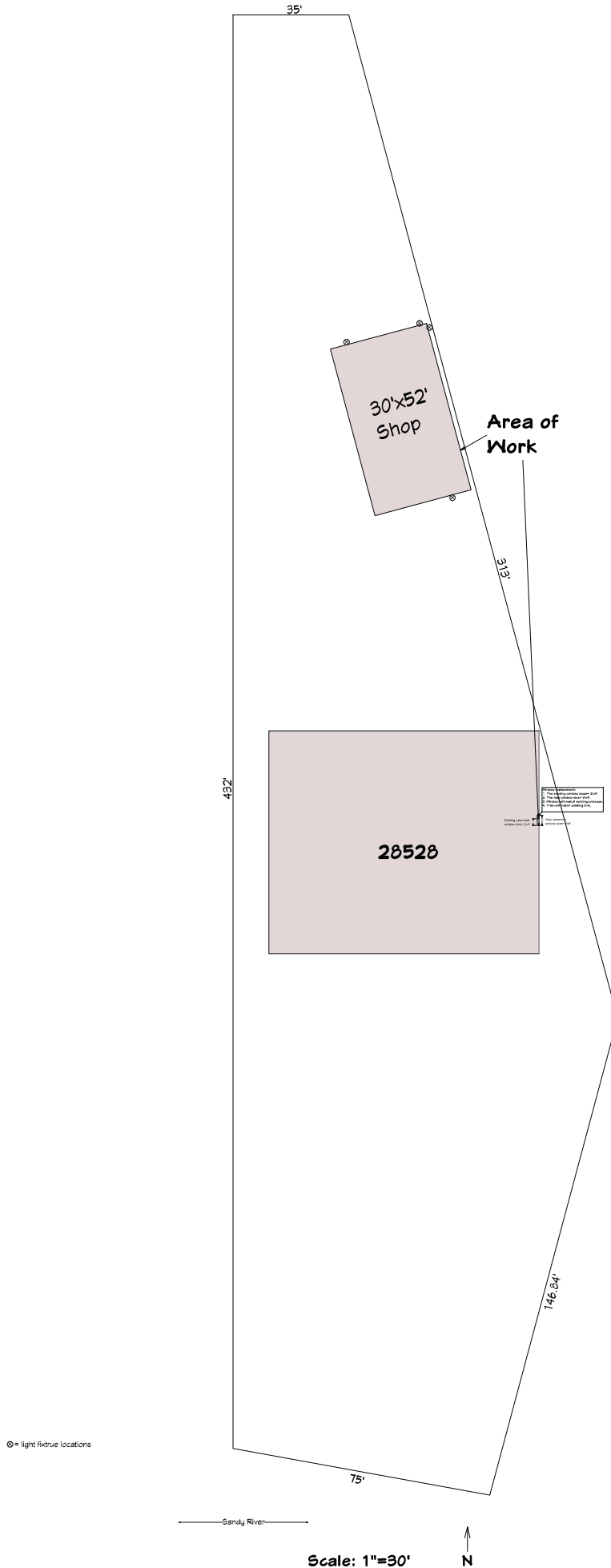
Scale: 1/4"=1'

Purposed East Elevation



Scale: 1/4"=1'

Site Plan



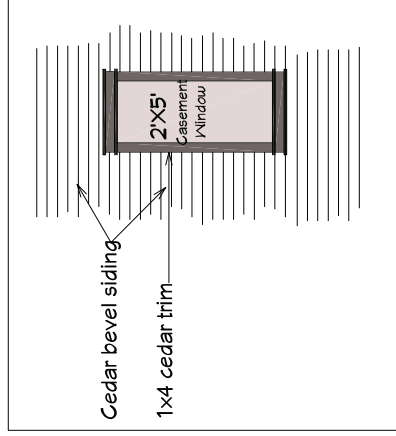
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50.2

ROOF FRAMING PLAN

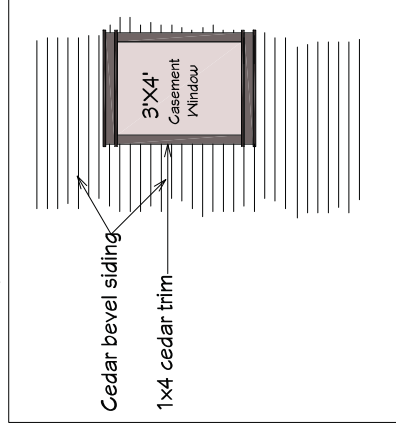
1/4" = 1'-0"

Purposed East Kitchen Window Elevation

Existing Window



Purposed Window



Scale: 1/4"=1'