



To: Columbia River Gorge Commission
From: Michael Lang, Conservation Director, Friends of the Columbia Gorge
Re: Comments on VSI Scenic Resources

DATE: April 11, 2022

Thank you for the opportunity to comment on the draft scenic indicators for the Vital Signs Indicators (“VSI”) Program. Friends of the Columbia Gorge (“Friends”) has reviewed the Staff Report and provides the following comments.

The VSI Program is an essential tool for the Columbia River Gorge Commission (“Commission”) and the U.S. Forest Service to determine whether the Management Plan for the Columbia River Gorge National Scenic Area (“Management Plan”) is fulfilling the purposes and standards of the National Scenic Area Act (“Act”). The data provided by the VSI Program should help guide the Commission’s and the Forest Service’s periodic review of the Management Plan or determine whether the Management Plan needs to be amended.

The VSI Program also, in part, helps fulfill the Commission’s mandate to monitor the activities of the counties and ensure compliance with the Act, as required by § 544m (A)(1).

The Act requires the protection and enhancement of scenic resources. This requirement is implemented through the establishment of scenic resource protection standards for land uses and development, such as “visually subordinate” and the more protective standard of “not physically evident” as seen from the 26 key viewing areas identified in the Management Plan.

To determine if scenic resources are being protected in accordance with the Act, the Commission must determine whether development has conformed with the applicable scenic resource protection standard both individually and cumulatively. Once the Commission has done this it would be in a position to determine whether the existing policies and guidelines in the Management Plan are fulfilling the requirements of the Act. It must also evaluate whether the Forest Service Scenery Management System continues to be the best system for protecting and enhancing scenic resources in the National Scenic Area.

Landscapes Visible from KVAs and Visual Subordination

Friends agrees with the Staff Report’s finding that it’s important to determine whether development meets the visually subordinate standard. Unfortunately, the staff believes it does not have the resources within its current budget to do this level of monitoring. If this is true, the VSI Program for scenic resources is of little value until the Commission has sufficient resources to fulfill its obligations to protect and enhance scenic resources, monitor development, and ensure compliance with the Act.

Friends’ recommends that the Commission explore collaborative efforts to evaluate compliance with the scenic resource protection standards. The Commission could start by identifying areas where there is a

high scenic sensitivity, high level of visibility from one more KVAs, and where there is a substantial level of development. The Commission and its partners could assess whether visual subordination is being achieved in these areas and could sample development reviews to determine whether the scenic standards were properly applied, whether the conditions of approval were followed, and whether the development meets the visually subordinate standard individually and cumulatively. In addition, Friends supports additional funding for the VSI Program and for the implementation of this indicator.

Air Quality and Visibility

The Management Plan requires protection and enhancement of visibility in the National Scenic Area. The state air quality agencies, in conjunction with the Forest Service, are required to provide annual reports on progress toward improving visibility impairment. This is mainly achieved through the implementation of the Regional Haze Rule. Friends is not aware that the state air quality agencies have reported progress to the Commission for several years. Friends recommends that the Commission request that the Oregon DEQ and the Washington Southwest Clean Air Agency resume annual reporting so the Commission can determine whether visibility is improving consistent with the requirements of the Management Plan and the Act.

Light Pollution

Friends recommends that the Commission and Forest Service focus this indicator on determining whether development within the National Scenic Area is meeting the applicable design and siting standards for lighting and whether the Management Plan guidelines are protecting scenic resources. Monitoring ambient light emanating from outside the National Scenic Area or from within the urban areas is outside of the scope of the Management Plan and possibly outside of the Commission's authority. Perhaps it would be helpful if the Commission staff could explain how that information would help inform the next review of the Management Plan.

Thank you for considering these comments and for the ongoing work on this important program.