



## Vicinity Map

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### **Applicable Approval Criteria:**

**For this application to be approved, the proposal will need to meet the applicable approval criteria below:**

Multnomah County Code (MCC): General Provisions: MCC 38.0015 Definitions, MCC 38.0030 Existing Uses and Discontinued Uses, MCC 38.0045 Review and CU Application Submittal Requirements

Administration and Procedures: MCC 38.0560 Code Compliance and Applications, MCC 38.0015 Definitions, MCC 38.0080 Signs

GGC Zone: MCC 38.3025 Review Uses, MCC 38.3260 Dimensional Requirements

NSA Site Review: MCC 38.7035 GMA Scenic Review Criteria, MCC 38.7045 GMA Cultural Resource Review Criteria, MCC 38.7055 GMA Wetland Review Criteria, MCC 38.7060 GMA Stream, Lake and Riparian Area 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**

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. 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 brackets.

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

- a. Two (2) years after the date of the final decision, when the use or development has not been established according to all specifications and conditions of approval in the land use approval. For land divisions, “established” means the final deed or plat has been recorded with the county recorder or auditor [MCC 38.0690(A)]
- b. Within two (2) years of the date of the final decision, when construction has not commenced. [MCC 38.0690(B)(1)]
  - i. For purposes of Condition #1.b., commencement of construction shall mean actual construction of the foundation or frame of the approved structure. For utilities and developments without a frame or foundation, commencement of construction shall mean actual construction of support structures for an approved above ground utility, development, or actual excavation of trenches for an approved underground utility or development. For roads, commencement of construction shall mean actual grading of the roadway.
  - ii. Notification of commencement of construction will be given to Multnomah County Land Use Planning Division a minimum of seven (7) days prior to date of commencement and shall state the date of commencement. Notification shall be given in writing and emailed to *isabella.liu@multco.us* and reference the case number. [MCC 38.0690(B)(3)]
- c. When the structure has not been completed within two (2) years of the date of commencement of construction. [MCC 38.0690(B)(2)]
  - i. For purposes of Condition #1.c, 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. [MCC 38.0690(B)(4)]

**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. An alteration of the existing freestanding pole sign will require a sign permit demonstrating compliance with MCC 38.0080(A) and (D). [MCC 38.0080(F)(1)]

3. Ongoing Condition:

- a. The property owners shall be responsible for the proper maintenance and survival of any required vegetation. [MCC 38.7035(A)(4)]

**Note:** Once this decision is final, application for building permits may be made with the City of Gresham. When ready to have building permits signed off by land use planning, the applicant shall 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, “Prior to land use sign-off for building plan check...” Be ready to demonstrate compliance with the conditions.

2. Contact the Oregon Department of Transportation to obtain the necessary permits associated with this project.
3. Contact the City of Portland, Bureau of Development Services, On-site Sanitation via e-mail [septic@portlandoregon.gov](mailto:septic@portlandoregon.gov) or by phone at 503-823-6892 for information on how to complete the Septic Evaluation or Permit process for the proposed development. All existing and/or proposed septic system components (including septic tank and drainfield) must be accurately shown on the site plan.
4. Contact Staff Planner, Izzie Liu, at 503-988-0213 or [isabella.liu@multco.us](mailto:isabella.liu@multco.us), for an appointment for review of the conditions of approval and to sign the building permit plans. Land Use Planning must sign off on the plans and authorize the building permit before you can go to the Building Department. At the time of this review, Land Use Planning may collect additional fees.

The above must be completed before the applicant can obtain building permits from the City of Gresham. Three (3) sets each of the site plan and building plans are needed for building permit sign off. At the time of building permit review, a fee may be collected and an erosion control inspection fee may be required.

**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:** The applicant requests a National Scenic Area Site Review to construct a replacement restaurant. The original building (Shirley’s Tippy Canoe) was destroyed in a fire on January 17, 2020.

### **2.0 Property Description & History:**

**Staff:** The subject property is zoned Gorge General Commercial (GGC) and located within the following key viewing areas: Historic Columbia River Highway and the Sandy River. Prior to the fire on January 17, 2020, the subject property was developed with a 4,583-square-foot restaurant, a detached accessory structure used as a storage shed, and a freestanding pole sign. The accessory structure and freestanding pole sign were not damaged in the fire. The existing parking area is gravel and the only proposed change is the removal of the parking area adjacent to the right-of-way per ODOT’s requirement. The western portion of the subject property is densely covered in vegetation.

### **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 as Exhibited in C.1 and C.5. Staff received two agency comments and three public comments during the 14-day comment period. Staff summarizes the comments below.

#### **3.1 Agency Comments**

1. Chris Donnermeyer, USFS Heritage Program Manager, submitted the following comment (Exhibit D.1):

*I have reviewed the proposed undertaking and area of potential effect as stated on the development review application, against the National Scenic Area records and inventories. These inventories include the cultural resource site inventory maintained by the State Historic Preservation Office. Based upon the information provided in these inventories and the requirements of the Gorge Commission’s Land Use Ordinances, it is recommend that:*

*A Cultural Resource Reconnaissance Survey is: Not Required*

*A Historic Survey is: Not Required*

2. Diana Powers, ODOT Development Review Planner, submitted the following comment (Exhibit D.2):

*A State Highway Approach Road Permit from ODOT for access to the state highway for the proposed use is required. Truck turning templates shall be provided as needed to ensure vehicles can enter and exit the approach safely. Site access to the state highway is regulated by OAR 734.51. For application information go to <http://www.oregon.gov/ODOT/HWY/ACCESSMGT/Pages/Applications-Forms.aspx>.*

#### **3.2 Public Comments**

3. Chuck and Molly Moore, community members, provided an email on March 7, 2022 (Exhibit D.3).

**Staff:** Staff received comments in support of the proposal.

4. Tadd and Lynn Reaney, community members, provided an email on March 11, 2022 (Exhibit D.4).

**Staff:** The community members expressed concerns related to the light and noise pollution that could potentially be generated from the use but was in support of the proposal.

5. Friends of the Columbia Gorge (“The Friends”) provided an email on March 17, 2022 (Exhibit D.5).

**Staff:** The Friends provided comments to ensure that the proposed replacement building maintains the same use prior to the fire. The Friends cited an article from KOIN news that states that the second floor was used as a storage and office area for the restaurant.

#### **4.0 Administrative Procedures Criteria:**

##### **4.1 MCC 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 for any property that is not in full compliance with all applicable provisions of the Multnomah County Land Use 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:**

- (1) It results in the property coming into full compliance with all applicable provisions of the Multnomah County Code. This includes sequencing of permits or other approvals as part of a voluntary compliance agreement; or**
- (2) It is necessary to protect public safety; or**
- (3) It is for work related to and within a valid easement over, on or under an affected property.**

**(B) For the purposes of this section, Public Safety means the actions authorized by the permit would cause abatement of conditions found to exist on the property that endanger the life, health, personal property, or safety of the residents or public. Examples of that situation include but are not limited to issuance of permits to replace faulty electrical wiring; repair or install furnace equipment; roof repairs; replace or repair compromised utility infrastructure for water, sewer, fuel, or power; and actions necessary to stop earth slope failures.**

**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 was originally codified in the chapter related to land use application procedures and, by its terms, expressly applies to the application review process. Although now codified in the administration and procedures part of the Columbia River Gorge National Scenic Area Code this standard is remains applicable to the application review process and not to the post-permit-approval enforcement 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. As such, an applicant has no initial burden to establish that all elements of the subject property are in full compliance with the

Zoning Code and all previously approved permits; instead, in the event of evidence indicating or establishing one or more specific instances of noncompliance on the subject property, the applicant bears the burden to either rebut that evidence or demonstrate satisfaction of one of the exceptions in MCC 38.0560.

For purposes of the current application, staff is not aware of any open compliance cases on the subject property, and there is no evidence in the record of any specific instances of noncompliance on the subject property. *This criterion is met.*

## **5.0 National Scenic Area (NSA) Site Review Criteria:**

### **5.1 MCC 38.0030 Existing Uses and Discontinued Uses**

**(C) Replacement of Existing Structures Damaged or Destroyed by Disaster: An existing structure damaged or destroyed by fire, flood, landslide or other similar disaster may be replaced if a complete land use application for a replacement structure is submitted to the reviewing agency within two years of the date the original structure was damaged or destroyed. The replacement structure shall comply with the following standards:**

**Staff:** The original building was destroyed by fire on January 17, 2020. The County received the replacement structure application on December 9, 2021 and deemed the application complete on January 12, 2022. *This criterion is met.*

**(1) The replacement structure shall be used in the same manner and for the same purpose as the original structure. An existing mobile home may be replaced with a framed residence.**

**Staff:** The original structure was constructed in 1946 as a restaurant on the first floor and a dwelling unit on the second floor. The applicant has stated that at the time of the fire, the second floor was being used as an office and storage space specifically for the restaurant use (Exhibit A.30). The second floor on the replacement structure will be used in the same manner. As evidence of the existing use, the applicant has provided photographs posted on social media platforms. Based on the timestamp, these photographs were taken in November and December of 2019 (Exhibit A.29). The applicant also provided exterior photographs taken between 2016 and 2021 that further demonstrate that the restaurant was in full operation prior to the fire (Exhibit A.26). *This criterion is met.*

**(2) The replacement structure shall be in the same location as the original structure. An exception may be granted and the replacement structure may be sited in a different location if the following conditions exist:**

**(a) A registered civil engineer, registered geologist, or other qualified and licensed professional hired by the applicant demonstrates the disaster made the original building site physically unsuitable for reconstruction.**

**(b) The new building site is no more visible from key viewing areas than the original building site. An exception may be granted if a registered civil engineer, registered geologist, or other qualified and licensed professional hired by the applicant demonstrates the subject parcel lacks alternative building sites physically suitable for construction that are no more visible from key viewing areas than the original building site.**

**(c) The new building site complies with the cultural resources, natural resources, and treaty rights protection provisions.**

**Staff:** The applicant is proposing to construct the replacement building in the same footprint as the original building (Exhibit A.26). *This criterion is met.*

**(3) The replacement structure shall be the same size and height as the original structure, provided:**

**(a) The footprint of the replacement structure may be up to 10 percent larger than the footprint of the original structure.**

**Staff:** The original structure was 4,583 square feet in size. The proposed replacement structure is 4,750 square feet which is approximately 3.6% larger than the original building (Exhibit A.35). *This criterion is met.*

**(b) The walls of the replacement structure shall be the same height as the walls of the original structure unless a minor increase is required to comply with standards in the current jurisdictional building code.**

**Staff:** According to the applicant, the original structure had walls that were 10 feet in height (Exhibits A.30 and A.35). The applicant has demonstrated that the replacement structure will be constructed with 10-foot walls. The original structure and the replacement structure is 26 feet in height (Exhibit A.35). *This criterion is met.*

**(4) The replacement structure shall only be subject to the following scenic resources standards:**

**(a) The replacement structure shall comply with the scenic resources provisions regarding color and reflectivity. These provisions shall be applied to achieve the applicable scenic standard (visually subordinate or not visually evident) to the maximum extent practicable.**

**Staff:** The proposed replacement structure will be required to achieve the “Visually Subordinate” scenic standard. As defined in MCC 38.0015, “Visually Subordinate” means:

*The relative visibility of a structure or use where that structure or use does 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. Visually subordinate forest practices in the Special Management Area shall repeat form, line, color, or texture common to the natural landscape, while changes in their qualities of size, amount, intensity, direction, pattern, etc., shall not dominate the natural landscape setting.*

The siding of the replacement structure will be constructed from knotty cedar wood and will be painted a dark earth tone that is similar to sample color B1 in the Columbia River Gorge Scenic Resources Implementation Handbook. The accent colors will be similar to sample color A1 (Exhibit A.34). The applicant is proposing a metal roof that will be finished in a matte black that is non-reflective (Exhibit A.34). The eastern side of the structure facing the highway will be constructed with floor to ceiling windows. The applicant has stated that the structure is designed with an overhanging parapet that will shade the glass which is a recommended mitigation measure. To further shield the glass windows from the headlights of passing vehicles, the applicant is proposing an approximate 21-foot wide landscaping strip along the front of the structure. The landscaping strip will contain a mixture of groundcover plantings and shrubs that will not exceed 3.5 feet in height (Exhibit A.38). ODOT has confirmed that the proposing landscaping in this area shall be limited to low-growing shrubs, grass, or flowers that do not attain sufficient height to obstruct clear vision in any direction (Exhibit A.19). The applicant also states that the existing vegetation along the southern and northern property boundaries will allow additional screening from the highway. As a condition of approval, the property owners shall be responsible for the proper maintenance and survival of any required vegetation. *This criterion is met.*

**(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.**

**Staff:** The original structure was built with covered and uncovered outdoor areas on the first and second floors. In the original structure, the total open outdoor area was 2,211 square feet. The applicant is proposing to maintain the open outdoor areas that will cover 2,842 square feet. The open areas will not be contained within walls but some portions of the outdoor will have a roof cover. *This criterion is met.*

**(c) In the General Management Area, the replacement structure shall comply with the scenic resources provisions regarding landscaping. These provisions shall be applied to achieve the applicable scenic standard (visually subordinate) to the maximum extent practicable, provided:**

**1. Except as provided in 2. below, the percent of the replacement structure screened by vegetation as seen from key viewing areas shall not exceed the percent of the original structure that was screened by vegetation as seen from key viewing areas. Coniferous vegetation shall be replaced with coniferous vegetation and deciduous vegetation shall be replaced with deciduous vegetation unless the applicant chooses to use all coniferous vegetation.**

**Staff:** The applicant states that the 2020 fire did not affect the existing vegetation surrounding the original structure (Exhibit A.21). The subject property has an existing dense coverage of vegetation along the western, northern and southern property boundaries (Exhibit A.27). The applicant has determined that the original structure was screened 100 percent from the KVAs in these directions. The original structure was screened 0 percent from the east, directly facing the highway (Exhibit A.20). The applicant is not proposing to plant additional vegetation for screening purposes to ensure that the replacement structure screened by vegetation as seen from the KVAs will not exceed the percentage of screening of the original structure. *This criterion is met.*

**2. In situations where the original structure was approved under Scenic Area regulations (e.g., Final Interim Guidelines, land use ordinance), the percent of the replacement structure screened by vegetation shall comply with any conditions of approval that required a landowner to preserve existing vegetation and/or plant and maintain new vegetation to screen the original structure as seen from key viewing areas.**

**Staff:** The original structure was not approved under Scenic Area regulations. *This criterion does not apply.*

**3. To help determine how much vegetation may be required under 1. and 2. above, land use applications shall include all available documentation (photographic or otherwise) on the amount and type of vegetation that screened the original structure from key viewing areas. At a minimum, development review decisions shall include findings that address the following:**

**a. The percent of original structure facing each key viewing area that was screened by coniferous vegetation, for each key viewing area from which the structure was visible.**

**b. The percent of original structure facing each key viewing area that was screened by deciduous vegetation, for each key viewing area from which the structure was visible.**

**Staff:** As stated in a previous finding, the applicant has determined that the original structure was screened 100 percent by coniferous trees from the KVAs in all directions except from the east, directly facing the highway. The original structure was screened 0 percent from the east. The applicant provided aerial photographs and photographs from the highway facing the subject property to provide a clear picture of the existing vegetation that screened the original structure (Exhibit A.27). *This criterion is met.*

**c. Elevation drawings showing the replacement structure and the amount of coniferous and deciduous vegetation that would screen the structure from key viewing areas in 10 years.**

**4. The height of any new trees shall not be required to exceed 5 feet.**

**5. The time frame for achieving visual sub-ordinance shall be 10 years or less from the commencement of construction.**

**Staff:** The applicant will not be planting any additional vegetation for screening purposes because the applicant cannot exceed the existing percentage of screening as seen from the KVAs. *These criteria are not applicable.*

**(d) In the Special Management Area, the replacement structure shall comply with the scenic resources provisions regarding landscaping. These provisions shall be applied to achieve the applicable scenic standard (visually subordinate or not visually evident) to the maximum extent practicable, provided:**

**1. The Scenic Resources Implementation Handbook shall be utilized to determine approvable species and minimum approvable sizes of new trees planted (based on average growth rates expected for approvable species).**

**2. The height of any new trees shall not be required to exceed 5 feet.**

**3. The time frame for achieving the applicable scenic standard (visually subordinate or not visually evident) shall be 10 years.**

**Staff:** The subject property is not located within the Special Management Area. *These criteria are not applicable.*

**(5) The replacement structure shall be subject to (B)(1), (B)(2), and (B)(3) above if it would not comply with (C)(2) and (C)(3) above.**

**Staff:** As demonstrated in the findings above, the replacement structure complies with (C)(2) and (C)(3) above. *This criterion is met.*

**(6) The original structure shall be considered discontinued if a complete land use application for a replacement structure is not submitted within the two year time frame.**

**Staff:** The original building was destroyed by fire on January 17, 2020. The County received the replacement structure application on December 9, 2021 and deemed the application complete on January 12, 2022. *This criterion is met.*

## **6.0 Signs**

### **6.1 MCC 38.0080 Signs**

\* \* \*

**(F) Any sign in the General Management Area which does not conform with subsections (A) and (D) and has existed prior to adoption of the Management Plan shall be considered existing and subject to the following:**

**(1) Alteration of existing signs shall comply with MCC 38.0080(A) and (D).**

**Staff:** An existing freestanding pole sign was established on the property for the restaurant that existed prior to the fire on January 17, 2020 (Exhibit A.14). The applicants have indicated that the existing sign will be used for the replacement restaurant (Exhibit A.31). An alternation to the existing freestanding pole sign will require a sign permit that demonstrates compliance with MCC 38.0080(A) and (D). *As conditioned, this criterion is met.*

## 7.0 Conclusion

Based on the findings and other information provided above, the applicant has carried the burden necessary for the National Scenic Area Site Review to establish a replacement restaurant in the GGC zone. This approval is subject to the conditions of approval established in this report.

## 8.0 Exhibits

‘A’ Applicant’s Exhibits

‘B’ Staff Exhibits

‘C’ Procedural Exhibits

‘D’ Comments Received

Exhibits with a “\*” after the exhibit # have been included as part of the mailed decision. Those exhibits have been reduced to a size of 8.5” x 11” for mailing purposes. All other exhibits are available for review in Case File T2-2021-15331 at the Land Use Planning office.

Exhibit #	# of Pages	Description of Exhibit	Date Received / Submitted
A.1	1	Application Form	12.09.2021
A.2	6	Revised Narrative	12.09.2021
A.3	1	Site Plan	12.09.2021
A.4	1	Ground Floor Plan	12.09.2021
A.5	1	Dwelling Floor Plan	12.09.2021
A.6	1	Elevation Drawings	12.09.2021
A.7	3	Exterior Details	12.09.2021
A.8	3	Existing Conditions & Proposed Improvements	12.09.2021
A.9	1	Exterior Photos	12.09.2021
A.10	1	Landscape Screening	12.09.2021
A.11	1	Existing Conditions Site Plan	12.09.2021
A.12	1	Landscape Plan	12.09.2021
A.13	2	Township Map	12.09.2021
A.14	1	Sign Permit	12.09.2021
A.15	6	Affidavits	12.09.2021
A.16	17	Stormwater Drainage Control Certificate	12.09.2021
A.17	5	Septic Review Certification	12.09.2021
A.18	5	Fire Service Agency Review	12.09.2021
A.19	25	ODOT Approval	12.09.2021
A.20	3	Supplemental Narrative	01.05.2022
A.21	6	Revised Narrative	01.05.2022
A.22	1	Revised Site Plan	01.05.2022
A.23	2	Revised Floor Plans	01.05.2022
A.24	1	Revised Elevation Drawings	01.05.2022
A.25	3	Revised Exterior Details	01.05.2022
A.26	3	Revised Existing Conditions & Proposed Improvements	01.05.2022

A.27	3	Revised Exterior Photos	01.05.2022
A.28	2	Revised Landscape Plan	01.05.2022
A.29	4	Existing Use Documentation	01.05.2022
A.30	6	Revised Narrative	07.05.2022
A.31	1	Revised Site Plan	07.05.2022
A.32	2	Revised Floor Plan	07.05.2022
A.33	1	Revised Elevation Drawings	07.05.2022
A.34	3	Revised Exterior Details	07.05.2022
A.35	3	Revised Existing Conditions & Proposed Improvements	07.05.2022
A.36	3	Revised Exterior Photos	07.05.2022
A.37	1	Revised Existing Conditions	07.05.2022
A.38	1	Revised Landscape Plan	07.05.2022
A.39	8	Revised Affidavits	07.05.2022
<b>'B'</b>	<b>#</b>	<b>Staff Exhibits</b>	<b>Date</b>
B.1	2	Division of Assessment, Recording, and Taxation (DART): Property Information for 1S4E06BB -00800 (Alt Acct# R994060530)	12.09.2021
<b>'C'</b>	<b>#</b>	<b>Administration &amp; Procedures</b>	<b>Date</b>
C.1	84	Agency Review	01.03.2022
C.2	4	Incomplete Letter	12.23.2022
C.3	2	Applicant's Acceptance of 180 Day Clock	12.28.2022
C.4	1	Complete Letter (Day 1)	01.12.2022
C.5	6	Opportunity to Comment and mailing list	03.02.2022
C.6	12	Administrative Decision and mailing list	08.10.2022
<b>'D'</b>	<b>#</b>	<b>Comments Received</b>	<b>Date</b>
D.1	4	U.S. Forest Service Comment	01.04.2022
D.2	2	Oregon Department of Transportation Comment	03.17.2022
D.3	9	Chuck & Molly Moore Comment	03.07.2022
D.4	2	Tadd & Lynn Reaney Comment	03.11.2022
D.5	1	Friends of the Columbia Gorge Comment	03.17.2022