



February 16, 2023

Board of County Commissioners (BoCC), Klickitat County  
205 S Columbus, Room 103  
Goldendale, WA 98620

Submitted via email to: [Bocc@KlickitatCounty.org](mailto:Bocc@KlickitatCounty.org)

Re: Zoning and Comprehensive Planning

Dear Commissioners:

At the Trout Lake Community Council (TLCC) February meeting we discussed rezone application Rezone ZON 2022-02 and SEPA No. SEP2022-34 with the proponents (Ross and Ashlyn Walton). Other community members also participated in the discussion. This discussion illuminated not only issues in relation to the rezone application but other issues of concern in our community. We feel that many of these issues are also being faced in other communities throughout the County.

Attached you will find the Trout Lake Community Council's (TLCC) letter of comment to the Walton Zone Change Application. We would truly appreciate it if you would take the time to review the letter as it enumerates some of the issues of concern in our community. I would like to also highlight some other concerns that were brought forward but not necessarily directly related to the rezone. Some of these concerns are as follows:

- The current rezone application process does not provide for a contextual analysis of impacts associated with the rezone. The proponent(s) is/are not required to disclose development plans nor any projected direct and indirect effects of a development proposal. Therefore, affected citizens are unable to provide relevant specific comments to rezone proposals submitted in this manner.
- Infrastructure costs (i.e. paved sidewalks, roads, stormwater drainage, and the like) associated with development in Rural Center can make it prohibitively expensive for subdivision development plans in the rural areas of the county. Proponents may choose to avoid these costs by the process of repeatedly short platting their parcels. This can result in development that is not well planned to achieve the best outcome regarding emergency access (including ingress/egress) nor developed to minimize adverse environmental impacts.

- Currently, extensive agriculture and forest resource lands can be divided down to a 20 acre minimum. In 2020 a rezone petition was brought forward by Dean Enterprises in the Byrnett Road area. The TLCC was not opposed to the rezone but did identify some areas of concern. The rezone petition was denied by the BoCC. Since that time the landowner has offered up three 20 acre parcels and marketed them at values far beyond the financial capacity of any young and growing family. This type of division of large acreages of forest resource and/or extensive agriculture properties into 20 acre “residential” parcels also expands the wildland-urban interface thereby complicating emergency response and evacuation in the event of a wildfire.
- The prevalence of second homes/vacation homes/vacation rentals has exacerbated not only the shortage of housing but also has driven market prices out of reach of local residents working and living in the county. Owners of second homes do not live full time in our communities. Therefore, they are not available to contribute in any consistent manner to our wide variety of community organizations which serve to support many aspects of our community, yet they benefit from those very same services.

These are just a few of the issues facing Trout Lake and other communities in Klickitat County. It highlights the urgent need for the County to move forward with the Comprehensive Planning Process. We are aware that the BoCC has tried to gain traction on this issue by attempting to hire a long-range planner. We are aware that such efforts have not been met with success. We acknowledge that the planning process can be difficult and, at times, divisive. We urge the BoCC to renew efforts in moving forward with beginning the process to update the Comprehensive Plan. Failure to do so will force the County to be reactive rather than proactive as the pressures of growth and development continue. We stand ready to assist the County as much as we are able to do so in this endeavor. Please let us know how we can be of assistance.

Respectfully,



DAINA L. BAMBE

Chair, Trout Lake Community Council

Cc: TLCC members



February 16, 2023

Klickitat County Planning Department  
Mo-Chi Lindblad, Director  
228 W Main Street, MS-CH-17  
Goldendale, WA 98620

Re: Rezone ZON 2022-02, and SEP2022-34  
Submitted via email: [loria@klickitatcounty.org](mailto:loria@klickitatcounty.org)

Dear Ms Lindblad:

Thank you for the opportunity to comment on Rezone ZON 2022-02 and the associated SEPA Determination of Non-Significance SEP 2022-34 (MDNS). The project proposal was submitted by Stuart (Ross) and Ashlyn Walton and representatives from Tenneson Engineering.

The Trout Lake Community Council (TLCC) met on February 7, 2023 via Zoom with the property owners and representatives from Tenneson Engineering. We appreciate the time they spent answering questions regarding the rezone proposal. The TLCC found the SEPA checklist submittal to be thorough and we appreciate the attention to detail provided by the applicant.

The checklist and the MDNS issued by the County assert that this non-project administrative action has no direct environmental impacts. However, a rezone from 20 acre parcels to minimum 5,000 square foot parcels can reasonably thought to have environmental impacts and therefore should not be taken lightly. These decisions are more suitable during the Comprehensive Planning process.

Of particular note in the rezone proposal is the intent of the property owners for future development of the parcel as specified in Section A, Item 7 on page 2 of the SEPA Checklist which states: "If this rezone is approved, the property will likely be subjected to limited future residential development." It appears, also, that the proponent intends for some level of commercial development to occur as specified under item 5 of the Zone Change Petition document. The proponents did not provide specific information about their future development intentions, but a letter of support provided the County in the SEPA packet states "I have people waiting in line for the lots to purchase", which indicates plans for residential development of some sort, at the very least.

In Klickitat County's comprehensive plan the purpose of Rural Center is as follows: "The rural center district provides for the location of small businesses and commercial services in rural areas for the convenience of county residents. The uses are intended to fit into farm and rural patterns of development without creating land use or traffic conflicts." Allowed uses include a broad range of commercial opportunities as well as single family dwellings, including mobile homes and duplexes.

What follows are many of the issues and/or comments from our meeting:

- We acknowledge that the 1995 Trout Lake Sub Area plan proposed for this parcel to be designated as rural center. However, that was 28 years (almost 3 decades) ago. Subsequently it was rezoned to Extensive Agriculture following an application by the previous owner. This current proposal could be viewed as planning by rezone, which is not desirable because, as stated previously, these non-project actions are not subject to adequate environmental review, which includes concerns such as traffic, impervious surface, and stormwater impacts.
- At the present time there is a notable amount of land in Trout Lake that is designated as Rural Center. Very limited development has occurred in Rural Center over the past decade. Some proposals have been brought forward (i.e. Old Mill Place proposal by Hollenbeck Properties, LLC in 2016) but have not moved past the planning stage. One issue brought up that may be limiting development is the cost of infrastructure, such as paved sidewalks and roads and other infrastructure elements required by the county. It is our understanding these elements are required as infrastructure needed for business activities. However, these requirements essentially make most any subdivision development proposal within the Rural Center Zone cost prohibitive for local landowners and/or developers. The County Comprehensive plan needs to be updated after a more thorough review and analysis of current and future community needs. This process may allow for a reassessment of such infrastructure requirements and/or a change in the zoning based on the stated purpose for development (i.e. residential versus commercial business).
- If the proponent is truly focusing on making more lots only available for residential use then perhaps RR1 designation may be more appropriate.
- There is a great need for affordable housing and/or building lots in Trout Lake, and elsewhere in Klickitat County. We are in support of such efforts but strongly feel that it must be in a well-thought out and deliberative process. A rezone and subsequent development does not necessarily result in affordable housing/building lots especially when driven by market conditions. Current land prices and construction costs essentially preclude affordable housing opportunities.
- As stated in the SEPA checklist, the proponent intends to develop this parcel after the rezone is approved. Depending on the extent of the development, this rezone will most likely conflict with at least one of the stated purposes of Rural Center by creating conflicts in traffic. Both Jennings Road and Wood Road adjoin the property and both roads are currently undersized to meet current traffic and maintenance needs (including snow storage) let alone the introduction of additional residential and/or business traffic.
- In Section B, Item 4(e) the proponent states they are not aware of any noxious weeds or invasive species on or near the site. The adjoining parcel to the east of the property does

have, at the minimum, knapweeds present. We strongly encourage the landowners to work with the County Weed specialist in reviewing their property and treating any invasives/noxious weeds prior to moving forward with a development proposal as knapweed seed viability in the soil can last for over 5 years.

- The irrigation ditch that runs through the property is designated as an F stream by the State of Washington with Resident Cutthroat Trout identified as the species of concern. This designation is most likely as consequence of the absence of a fish screen at the water diversion along Trout Lake Creek.
- We note that Glacier Springs Water Association states that they currently have the capacity to serve the property but “may require significant infrastructure upgrades.” This needs to be evaluated for feasibility and cost, which cannot properly be done in the absence of specific information about development plans.

There is general support by council members for additional residential development and this parcel seems like a logical location given its close proximity to the center of the Trout Lake community. Most members, however, had concerns around a blanket rezone without clear intent and a plan for thoughtful development.

Please let me know if you have any questions.

Respectfully,



DAINA L. BAMBE

Chair, Trout Lake Community Council

Cc: Trout Lake Community Council members  
Ross and Ashlyn Walton  
Board of County Commissioners  
Ben Beseda, Tenneson Engineering