



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

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