

Re: **File No. CMP-19-01 & REZ-19-01**

Ms. Sharon Rice
Skamania County Hearings Examiner
c/o Skamania Community Development Department

Re: File No. CMP-19-01 & REZ-19-01
West End Sub-Area Comprehensive Plan (WESACP) Amendment and
Rezoning Application

INTRODUCTION

- Resident 24 YEARS, 19 years on planning in the community.
- Ph.D. in Education & Research, taught at Indiana University & Boise State
- Taught measurement techniques, statistical analysis & evaluation methods to determine whether significant change has occurred
- Applied these skills in education, business & this community.

THREE ISSUES:

1st... Has there been significant change in the West End of Skamania County that warrants amending the West End Community Comprehensive Subarea Plan (WECCSP)?

2nd... Is the proposed increase in RL2-acre zoning allowed by the WECCSP?

3rd... Is the proposed increase in residential lots with wells in compliance with the WRIA 28 agreement between the Dept. of Ecology and Skamania County?

To determine if conditions have significantly changed, you need to know two things.

1st... What were conditions in the West End of Skamania County at the time WECCSP was developed in 2004 and enacted in 2007?

As detailed in the comment letter and appendix for this hearing:

- a.** The increase in homes/structures built in the five years before 2004 averaged **3.9%** a year. It was projected that the growth in new homes/structures built might continue at this rate (3.9%), or slow down to more closely approximate the population growth rate of **1.25%** occurring in the entirety of Skamania County.

- b. The in-fill of RL2 properties in 2007 was **29%**.

2nd... What has been and is occurring in the West End of Skamania County since 2007?

As detailed in the comment letter and appendix for this hearing:

- a. The estimated increase in new homes/structures built in the West End (covered by the WECCSP) from 2007 till August of 2017 averaged **3.0%** per year. The estimated increase in homes/structures built in RL2-acre zones from 2007 through 2019 averaged **3.7%**. **This is within the projected range upon which the plan was based and does not represent a significant change in circumstances.**

- b. The in-fill rate in RL2-acre zones at the end of 2019 as calculated by the County, was **38%**. A more accurate apples to apples comparison to 2007 puts the in-fill at **43%**. Whether you use 38% or 43% in-fill, **neither meets the 60% in-fill criteria to warrant a comp plan amendment.**

Is the proposed increase in RL2-acre zoning allowed by the WECCSP?

This was a matter of considerable discussion during the development of the WECCSP. As articulated in our comment letter, two alternative maps were presented by the planning department for community consideration in 2004. Neither map allowed for any additional RL2-acre zone expansion.

Language was intentionally added to WECCSP, specifically to prevent the expansion of RL2-acre zones.

Is the proposed increase in residential lots with wells in compliance with the WRIA 28 agreement between the Dept. of Ecology and Skamania County?

In 2006, Skamania County agreed with Dept. of Ecology to a Water Reservation of .64 cfs (cubic feet per second) as part of a state-wide water shed resources planning effort to **protect threatened salmon and steelhead in Washougal River.**

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In 2017, in your conclusions regarding the last proposed WECCSP amendment, you stated that *“The record presented is not clear how many new residences were in existence the date the reservation took effect and therefore, how many new residences can be added without exceeding the reservation”*...and that *“the evidence offered in the record is sufficient to require the question to be answered.”*

As articulated in our comment letter and Table 2 on page 11, our research since the last hearing in June 2017, has answered your question. The reservation took effect on **January 19, 2009**. The maximum allowed new wells after this date is **1,723**. The WECCSP planned for 1,893 new residences in 2007. Between February 2007 and January 18, 2009, an estimated 164 new homes/wells were built. Subtracting 164 from 1,893 leaves a total of 1,729 new homes/wells, which would slightly exceed the 1,723 allowed for by the water reservation at full buildout. With the WECCSP amendment that occurred in 2016, allowing 9 possible new homes/wells, this took the number to **1,738, further out of compliance**. If this proposed amendment is approved, it would push the number of new wells at full buildout to **1,750 and the resulting instream flow to .65, which exceeds the .64 allowed. This is not in compliance with the adopted instream flow rules**, which allow only 1,723 new wells after January 19, 2009.

If I may, I would like to offer the vision statement of the WECCSP. *“West Skamania County will continue to be a predominantly rural environment with open tracts of field and forest lands with residential and limited small scale commercial development. Water quality and quantity will be maintained or improved and wildlife will continue to abound. It will be a place where its residents can find refuge from the bustle and clamor of the urban and suburban areas of Clark County, Washington and Portland, Oregon.”* To date, the community developed WECCSP has been successful in achieving this vision. The controls built into the plan, which guide the planned development of our community, are working. They need to be adhered to, to ensure that this vision continues to be upheld.

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I respectfully request, based upon the facts we have presented to you, in the comment letter and appendix, that you recommend denial of this application for comp plan amendment and rezone.

Thank you,

Keith Brown, Ph.D.