

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

I am a local resident, and have been actively involved in this planning and zoning effort for over 19 years. While a group of us has submitted a 19-page comment letter signed by 32 area residents opposed to this amendment and a 54-page appendix, I appreciate the opportunity to testify.

This subarea plan was put in place to prevent this very kind of rezoning from happening. As was stated on the first page of the WECCSP, *“This subarea plan is intended to meet current and future needs and be less likely to be subject to a high degree of change.”*

This proposed amendment property was purchased in the summer of 2019. The applicants haven’t owned this property for 20 years. I can appreciate that the applicants would like to make a tidy profit, but not at the expense of our WECCSP. Not to mention, the application indicates that each lot would have perhaps 1-acre for a homesite, with the remaining 5 acres to be held as a natural forest land environment. My understanding is that this land has been clearcut, and is overrun by non-native, invasive scotchbroom. I fear approving this amendment would set a precedent that will lead to the eventual degradation of the rural character of the West End with all of its natural beauty, opening the door to turning FL20 forest lands into smaller residential lots.

The applicant infers that the WECCSP is somehow responsible for the reduction in “bare lands sales” throughout Skamania county from 2007 thru 2012. The applicant fails to mention that during this time frame, I specifically remember, the USA suffered a deep recession, resulting in record foreclosures and significant loss of capital for land acquisition.

In addition, in order to stop rampant, unregulated development that was occurring during 2006 and 2007, the Skamania County BOCC enacted a continued series of moratoria on subdividing or building permits for any 20-acre or larger parcels created by deeds since January 1, 2006 in unzoned lands. This moratorium continued and was not lifted until 2012. These two factors alone probably significantly impacted “bare land” sales.

A landowner’s willingness to sell their property is simply a matter of the natural mechanism of the real estate market and not a reason to amend the comprehensive plan. Given that current in-fill is somewhere between 38% and 43%, there is still plenty of property zoned as RL2 that can be developed. The WECCSP plan, as crafted, has not substantially slowed the development of RL2 lots. It has indeed had an average growth rate of **3.7% per annum since 2007**. There is no justification to create some sort of a hybrid RL2-acre zone that would supposedly be limited to no less than 5-acre lots (*staff report*) for development, when neither RL2 nor RL5 has met the 60% in-fill criteria necessary for a comp plan amendment. Frankly, feels a little like a shell game to me.

Speculative purchasing of large tracts of FL20-acre properties for the purpose of breaking it up into smaller 2- or 5-acre lots **NOT provided for in the WECCSP**, is the very thing this plan was designed to prevent. If people want to develop 2- or 5-acre lots, they should purchase larger tracts of RL2 or RL5-acre zoned property to do so...just as the Hearing Examiner articulated in 2017 (*see page 3 of our comment letter*). I can only surmise that the applicants don’t want to pay the premium price for these properties, preferring to buy, say for instance, clear-cut FL20-acre parcels for a minimal investment...and then try to get a comp plan amendment and a rezone.

To amend the WECCSP and give these applicants the right to subdivide and put in wells beyond the 1,723 allowed by the WRIA 28 agreement with the county would necessarily mean some people that (*at full buildout*) could have drilled a well, but would not then be able to once

the water reservation has been met – all to accommodate the subdivision of properties into smaller zones NOT planned for in the WECCSP.

Many subdivisions of property have occurred and more than **228** lots developed in the West End since 2007. Overall, development has occurred at about **3% per year in the West End**, since the WECCSP was approved. It is important to note that we have NOT objected to any subdivisions of property, nor the building of homes that were in alignment with and planned for in the WECCSP. **The plan is working.** Growth and development is occurring in a planned and sustainable fashion, while protecting the treasured rural character desired overwhelmingly by this community. The WECCSP was thoughtfully crafted through the efforts of over 250 individuals who met regularly for nearly 4 years. It is meeting the needs of our community.

The County Staff finds that “the proposal is consistent with the WECCSP”. This simply is **not** the case.

For the reasons articulated in our 19-page group commentary and as documented in the 54-page appendix, we respectfully request that you recommend **denial** of this proposed WECCSP amendment and rezoning application.

Thank you.

Teresa Robbins
211 Malfait Tracts Rd.
Washougal, WA 98671