

Friends of the White Salmon River
P.O. Box 802
White Salmon, Washington 98672

November 9, 2018

Amanda Smeller
Senior Planner
Klickitat County Planning Department
228 West Main Street. MS-CH-17
Goldendale, Washington 98620

RE: Preliminary MDNS for the Husum Ranch Subdivision SUB2018-02

Dear Ms. Smeller:

Thank you for the opportunity to make these comments on the preliminary MDNS for the Husum Ranch subdivision. I understand that this request for comments is for the purpose of possible improvements or revisions to the MDNS. Therefore, my comments will be informal in nature. We would expect to submit formal comments on the final environmental determination, when that is released. Our basic feeling is that while this project is appropriate to the zone, and while we are glad to see a public water system and community septic systems, the MDNS is not adequate.

We thank the applicants for taking the time to do the cultural resource survey.

We understand that Klickitat County's practice is to refuse to consider cumulative effects, so the MDNS is aimed only at the construction process. As you know, we strongly disagree with this approach, especially in a project of this size. There is substantial residential development in the Husum Hills subdivision around this project and in the area around Arrow Lane. This project will have a large impact on the Husum area, and we feel it is better to assess the cumulative effects of the various county actions.

These comments are not in order of importance, or necessarily in the order of the MDNS.

1. Stormwater and other runoff. Your mitigation measure #5 appears to apply to the construction process only. We have concerns about on-going runoff and stormwater runoff. The application states that approximately 25% of the site will be in impervious surfaces, and that bio-swales and vegetative buffers will be used to control run-off once the site is developed. This appears to be a tentative intention, however, rather than a requirement. We would favor more certain requirements to contain run-off. Obviously, Friends of the White Salmon (FWSR) has concerns for any impact on water quality to nearby waterways.
2. In line with these concerns, it is not only septic discharge, but lawn chemicals, oil and other contaminants from roads and vehicles, car washing, snow removal chemicals and other contaminants that must be anticipated in residential development.
3. The checklist, on page 8, states that storm water will be contained and managed "onsite and through an easement with neighboring parcel 0411311710040. What exactly does this easement permit? Is it recorded?
4. We have questions about the use of irrigation water from the water district. The use of this water is not made clear. Is it for the open space? The yards of houses? Depending on the proposed use, this water could add to runoff. I do not see anything in the application from the water district confirming that they will continue to supply "irrigation" water and for what purpose and in what quantity? Also, I wonder if water supplied by them can be used for residential purposes. It would be useful to have a letter from the district clarifying this.
5. Along these lines as well, we support the fire district's request that fire suppression devices and water meet the standards they cite. The application says that water will be available from the "irrigation pond" for firefighting. Again, is this permitted under the water district's rules, and is this source of

- supply satisfactory to the fire department? Will this water be available during all 12 months of the year? The project summary says there will be two standpipes. Is this enough?
6. I do not see the irrigation pond designated on any of the maps, and I do not see information about the pipe or ditch that carries and distributes irrigation water at the site. This information would be helpful in assessing the extent of use of this water that can be anticipated, affecting runoff and discharge considerations.
 7. Septic systems. We support and appreciate the use of the community systems. However, the information provided is a little confusing. Clearly, the proposed systems will reduce nitrates substantially. However, it isn't clear what number of them are proposed? One place says five, some others say six. The soil evaluation was for 48 lots and 144 bedrooms, not the 50 lots in the proposal. I did not find information about expected discharge, for an average of three bedrooms per house, at 48 lots. While this sounds reasonable, I am not sure how it can be anticipated, since each lot will be sold to a buyer who will build what they please, within the covenants. I also do not have any information about the expected volume of discharge from the community systems, and how large are the required drain fields. It could be that this information is in the check-list and I missed it. If that is the case, please point me to it.
 8. Fordyce water will gain 77 connections. The Fordyce letter states that Husum Ranch will apply for connections according to the bylaw and procedures of the water system. I understand that there is a waiting list for connections. How many are on the waiting list and are the new connections enough to satisfy them and Husum Hills? The letter says that Husum Ranch will be entitled to the number of connections to reimburse fees paid to professional in order to update Fordyce's capacity analysis." How many will this be?
 9. We support requiring all lighting in the project, including residential, to meet the dark skies requirements. We believe it is important to all of us to maintain the current ability to enjoy night skies.
 10. There is no consideration of the effect on this project on the community of Husum. I understand that traffic is mostly likely to go south, but will these houses be in the Husum post office area? How many trips a day will that require? Traffic in the center of Husum is already dangerous to vehicles and pedestrians alike. We are used to gradual development, but this project brings a significant number of houses and residents to the area in a relatively short period of time, assuming the population boom continues in western Klickitat. What are the goals and vision for the community of Husum over the next 20 years?
 11. We would request some soils testing before construction begins to determine if there are chemical residues in the soils from the years of use as a golf course. Golf courses in general tend to be heavy users of various kinds of pesticides, including herbicides, and we should know before soil disturbance starts if there are residues which would require safety measures, or special runoff precautions, or any kind of special preparation for residences with children.
 12. The traffic studies need to include Husum to the north, the Y to the south, and the junction with Hwy 14. In the last years we have seen a serious increase in traffic at all of these places, and the prediction in the traffic study is for 323 trips a day to be generated by the project. This is a largish number, given the current rural conditions.

Again, thank you for the opportunity to comment.

Very truly yours,

Patricia L. Arnold, President
Friends of the White Salmon River

