



# Friends of the White Salmon River

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Mo-chi Lindblad  
Klickitat County Planning Director  
228 West Main Street, MC-CH-17  
Goldendale, Washington 98620

via email to: [planning@klickitatcounty.org](mailto:planning@klickitatcounty.org)

Re: Preliminary MDNS, Under Canvas Columbia River Gorge Project SEP2020-21, CUP2020-13, RV2020-01, BSP2020-03

Dear Ms. Lindblad:

Friends of the White Salmon River (FWSR) is a non-profit organization dedicated to protecting the White Salmon River and its watershed for fish, wildlife, and for the residents of the area. FWSR's supporters include citizens of Klickitat and Skamania Counties and others who live, work and recreate in the White Salmon River watershed. Our members and supporters would be negatively affected by land use actions that have an adverse effect of the river, its tributaries, and wildlife habitat.

Thank you for the opportunity to comment on the preliminary MDNS for the Under Canvas project. We support your action in issuing a preliminary determination for this complicated application. We continue to oppose the project and don't see anything in the documents submitted by the applicant that changes our position. We understand that the SEPA determination precedes County action and hearings on the Conditional Use Permit. We will therefore briefly summarize our thoughts about this project overall. We expect to fully participate in the upcoming hearings on the Conditional Use Permit.

**A. Here, in brief, are our opinions about the project as proposed.**

1. We appreciate the applicant's intention to respect the management boundary of the Wild & Scenic River. We would certainly like to see these 30 acres formally protected. We recognize that given the history of the Wild & Scenic segment, which is decidedly unprotected, formal protection, even in a binding site plan if not in outright donation, would be historic, and I do not use that word lightly.
2. We further appreciate the applicant's forest management plan and intention to return much of the site to status as working forest. We strongly support resource land and business, when conducted in environmentally sound ways.
3. We are skeptical that any way can be found to provide sufficient potable water. Please see further comments below on this point.

4. We do not think the project can be approved as a Conditional Use in this area. It does not meet the standard of being appropriate and compatible in the particular location proposed.
5. No doubt there will be arguments about the meaning of the word “temporarily” in the definition of a Recreation Park<sup>1</sup>. The permanent installations of various facilities, and the nature of the accommodations provided move this project past the marker of temporary in our opinion.
- 6.

#### **B. Comments on the SEPA determination**

1. The maps provided and the narrative are not always consistent, particularly in terms of acreage. It is difficult to ascertain the exact acreage that is proposed to be used for the development of the tents and other facilities. This makes evaluation of impacts difficult. The development area is variously presented as between 20 and 40 acres. This needs to be clarified and finalized, including on the maps.
2. Even without complete clarity on the maps, it is clear that the protection for Western Gray Squirrel is not sufficient. The environmental determination should require specific protections for WGS and WGS habitat. The presence of WGS is confirmed both in the forest management plan and in the SEPA Checklist, but measures to protect them are only included as part of an upcoming FPA. Tents and buildings are proposed to be developed in or within very close proximity to priority habitat, which would be detrimental to the WGS. This needs to be strengthened.

In regard to WGS, the SEPA is inadequate for the needed FPA for conversion.

3. The SEPA Checklist and the MDNS are both insufficient regarding ground water withdrawal and potable water supply. The plans for drinking water source and system, including quantities, need to be clearly spelled out, including on the maps, before an adequate SEPA determination can be made. Plans to use gray water for toilets might slightly reduce the need for drinking water, but we doubt the effect would be significant, and if gray water use is being planned, then those plans also need to be spelled out as part of the SEPA process.

The Checklist introduction states “Hauling of water to the site and/or acquisition of water rights is being considered to meet water demand should it exceed the quantities authorized un the permit exemption for groundwater...”. The Checklist also says that an on-site public water system with on-site storage will be installed. What amount of storage? Located where and stored in what? There are references in various documents to a Group A system, to hauling water to the site, and to water rights.

It should be determined whether an exempt well can be used for a Group A system, which the system for this project will most certainly have to be. Exempt wells are for domestic use.

Even if an exempt well were to be accepted as a source for a Group A system, these wells are limited to 5000 gallons per day, which is not sufficient for the project. The applicant states that historic usage at other camps predicts 5,000 – 7,000 gallons per day, with the design process based on 8,000 – 10,000 per day.

In any future SEPA, we urge the use of stronger language than in the present point IV.6. Potable water must come from (not be understood to come from) a permitted public water supply, providing a level of drinking water quality that meets state standards. Permits from the

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<sup>1</sup> Ordinance No. 011188 3.10.h

Washington State Department of Health are required for public drinking water systems. If water rights are needed for a source of potable water for this project, the source of water needs to be identified and the water rights obtained before any county permits are issued.

4. The impacts of septic /sewage systems are not adequately evaluated. Estimates should be provided for the amount of sewage that will be generated, to start. This would include the laundry, kitchen, common restrooms and showers, and en suite water usage. The maps, as best we can tell, show a total of nine communal restrooms. We would like the Checklist to spell this number out definitely and show that it is consistent with the RV-Park Ordinance, at a minimum.

We urge that small septic systems described in the Checklist not be allowed, as their operation is not regulated or inspected. Failure of such systems in this location could have detrimental effects on the White Salmon River and on groundwater. We believe that a Large On-Site Sewage system should be required, so that professional operation will be in place with state oversight. The mitigation proposed in IV.7 is not enough. The system should be designed by a licensed professional. "Working closely" with a designer is ambiguous language that needs to be strengthened.

5. Traffic studies underestimate the impact on Oak Ridge and its intersections, especially the intersection of Highway 141 and Oak Ridge Road in Husum. We understand that detailed comments on this point have been submitted by J.S. Morrow, which we feel does an excellent job of describing the issues.

Thank you again for the opportunity to comment on the preliminary SEPA determination. We look forward to further opportunities to participate in this process.

Very truly yours,



Patricia L. Arnold  
President