



# Friends of the White Salmon River

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June 17, 2021

Klickitat County Planning Department  
228 West Main Street  
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Submitted via email to [planning@klickitatcounty.org](mailto:planning@klickitatcounty.org)

RE: CUP2020-13/RV2020-01

Thank you for the opportunity to comment on these two applications from Under Canvas.

Friends of the White Salmon River is a non-profit organization dedicated to protecting the White Salmon River and surrounding lands for fish, wildlife, and the residents of the area. Friends of the White Salmon River's membership includes citizens of Klickitat County and members of the local community who would be affected by the proposed project. Our members and supporters live, work and recreate in the White Salmon River Valley. Our members and supporters would be negatively affected by increased development on farm and forestland in this area.

We request that these two applications be denied. The project does not meet the criteria for a Recreational Vehicle Park or for a Conditional Use Permit in Resource Land Overlay zone.

Applications are not and should not be automatically approved. Applications must meet criteria. If the application does not meet the criteria, it must be denied.

Under Canvas is making a valiant effort to make it appear that the project meets the criteria. We are overwhelmed with pages and pages of descriptions, arguments, plans, information about their other projects, almost none of which is relevant to the central issue – does this project meet the criteria? The answer is no.

## **1. Recreational Vehicle Park application**

Under Canvas is proposing to build a large glamping operation. Glamping means large tents provided by the company, which may or may not be on platforms and may or may not stay in place year around. Glamping means a large food service operation and labor-intensive guest service, beds and other furniture provided, with bed linens changed daily. Some tents will have "ensuite" bathrooms and most will have wood-burning stoves. None of these things are normally a feature of tents, certainly not as described in the Recreational Vehicle Park Code.

Glamping means a very high price for a night's stay, the opposite of the usual concept of camping or RV parks, which are generally thought to be available for low-cost, bare bones recreational use. Glamping is essentially a high-end hotel without walls.

Under Canvas calls their structures "safari-style tents". This is a concept that does not appear in Klickitat County's Recreational Vehicle Park code.

Permitted uses in Chapter 22.08.115 include temporary occupancy of camp site by RVs or tents. The common understanding, and the definition, of a tent is a portable shelter made of cloth, supported by one or more poles and stretched tight by cords or loops attached to pegs driven into the ground. Under Canvas is proposing structures on platforms<sup>1</sup> with cloth covers which may or may not be taken down, but are in no way "portable shelters".

The Under Canvas proposal does not fit the definitions and requirements of Chapter 22.08.

The Planning Department has a duty to help potential applicants fit their proposal into the right slots and make the right applications. Presumably County staff felt that the RV Park was the closest fit, and they correctly did their job steering the application in this direction. It is now our job to determine if the application meets the criteria, which it does not.

## **2. Conditional Use Permit application**

The Recreational Vehicle Park application requires a prior approved Conditional Use Permit. The Under Canvas project does not meet the criteria for a Conditional Use Permit. Criteria for approval of a conditional use permit is found in the zoning code. Additional information about the application process is found in the "Procedure for Processing Conditional Use Permit" document provided by the County to the applicant.

### **2.A. Information in the Procedure document.**

The "Procedure for Processing Conditional Use Permit" document says "It is the responsibility of the applicant to demonstrate that the proposed project is consistent with the purposes and intent of the zoning code and compatible with the existing and potential uses in the vicinity which are permitted outright." (Italics mine)

It is the applicant's responsibility to make their case. Under Canvas fails to do this. They offer a lot of anecdotal evidence about what good neighbors they are. They say they will have a beneficial impact on the economy. They say (page 3 of their supplement information in the application) that Klickitat County has "less tourism employment and sees lower economic impact from tourism than neighboring counties" as if this is a bad, sad thing. They say that their own growth elsewhere shows a demand for glamping. NONE OF THIS HAS anything to do with the suitability of this project for the zone and location proposed.

### **2.B. Criteria in the zoning code**

The site of the proposed Under Canvas project is located in the Resource Land District (RL), Klickitat County Code 2.26. The Resource Lands District has eight outright permitted uses, all of which are related to farm and forest use. There are also Accessory Uses outright permitted.

Under Canvas is not an outright permitted use or a permitted accessory uses. This brings us to Section 2.26:4 (1) – (12) which lists conditional uses, a long and varied list including a really remarkable variety of things. Some of the listed conditional uses are similar to, but not the same as, the glamping RV Park proposal from Under Canvas.

Specifically, Under Canvas does not qualify as a conditional use under 2.26:10, although some of these sound similar. "Park, playground, golf courses, country clubs, riding academies and stables, camping clubs,

recreation and conservation clubs, ski resorts, private clubs, lodges, convents or community center.” We could go through this list item by item and point out the differences, but we will only point out that Under Canvas is not proposing a club of any sort. It is proposing a private business that will operate in the same manner as a hotel, which is not a use included in this section.

Finally, there is a catch-all paragraph for conditional uses. Section 2.26:4 (13) allows “any other uses judged by the Board of Adjustment to be consistent with the purposes and intent of this chapter and to be no more detrimental to the adjacent properties than, and of the same type and character as, the above listed uses.” We will consider purposes and intent, and we will consider the question of detriment to adjacent properties.

### **2.A.i. Consistency with purpose of RL District.**

What is the purpose of the Resource Lands District? The purpose is stated in Section 2.26:1.

“The purposes of this district are to provide land for present and future commercial farm and forest operations in areas of productive soils and other conditions suitable for the continued success of such operations and to minimize conflicts between farm and forest practices and various nonfarm uses by allowing development of such land in accordance with performance criteria, evaluating the resource and development suitability of the individual parcels within the district.”

The Under Canvas proposal can is not consistent with the purpose of the RL. It takes a significant acreage out of production as timber land. It increases, instead of minimizing, conflicts with neighboring farm and forest use. One obvious example of this is their intention to fence cattle out of the area. For many years, as an open range area, cattle have freely utilized this site. Under Canvas will make this impossible. Our largest local cattle operation depends on cooperative grazing agreements, and will be harmed by this project.

People attracted by glamping are likely to want beautiful views, scenery, and an experience with “nature”. Like people building residences next to agricultural and forestry operations, they are not likely to be thrilled by the ordinary everyday operations of farms and ranches. It is just foolhardy to put a project sold as “glamping” and back to nature into an area of active farming and forestry. Conflicts are inevitable.

In Common Response 5, Under Canvas provides a partial quote from Chapter 19.53 of the Klickitat County code. The code says “The intent of the resource lands district is to minimize conflicts between farm or forest practices and various non-resource land uses by allowing measured residential development ...” Under Canvas omits the language about residential development. The intent is not to provide for non-farm and non-forest uses.

### **2.A.ii. Detriment to adjacent properties.**

To repeat, Section 2.26:4 (13) allows “any other uses judged by the Board of Adjustment to be consistent with the purposes and intent of this chapter and *to be no more detrimental to the adjacent properties than, and of the same type and character as, the above listed uses.*” (Italics mine)

It's hard to compare the detrimental effects of Under Canvas to detrimental effects of the long, random list of possible conditional uses. It is not really necessary to prove greater detriment, since the project clearly does not meet the requirement for consistency with purpose. Still, we will identify three possible areas of greater detriment. As a sidenote, Under Canvas is not completely clear on the possible use of the site for events. Any use as an event site absolutely increases these detrimental effects.

- Traffic. Under Canvas' traffic studies downplay the impacts of the vehicular traffic that the project will generate. The increase in the number of vehicles and trips on a narrow, unpaved, curvy road will increase impacts from dust, especially significant for vineyard and orchard uses located nearby. The

movement of agricultural (including cattle trailer) equipment is likely to be impeded. These are slow-moving vehicles but still on tight schedules, especially during harvest.

- Water. Under Canvas says, in Common Response 5 that neighbors do not have a valid legal basis to object to use from an exempt well and/or additional water based on a documented right. This is true, but neighbors do have a valid legal right to object to overuse of water. Under Canvas is pushing the limits of the unregulated well they propose to drill, limited officially to 5000 gallons per day. The Under Canvas estimate of 10 gallons of water use per person per day cannot be adequate. Migrant farmworker housing uses an estimate of 50 gallons of water per day per person, and those are folks who are mostly absent from their residences all day.

The first application materials clearly indicate that Under Canvas thought they'd have to find additional water. The water they can legally pump is not sufficient. Exempt well are not subject to metering or regulation. The effect of excess withdrawals of water is not only likely, it has a high probability of being detrimental to adjacent properties. There is NO additional documented right at the present time. Water rights take a long time to process. The health department will not permit water to be trucked in. How is Under Canvas going to manage on a quantity of water that their first application made clear was inadequate?

- Fire. The sheer number of people projected to be the site significantly increases the fire danger, with detrimental effects on neighboring parcels. The application is not clear on use of the site for events, but it is certainly a possibility mentioned, and one that would significantly increase the fire hazard. As pervious commenters have mentioned, Under Canvas' reliance on plans to be developed in the future is not an adequate response. We need to focus on avoiding fire, and not doing so at the costs imposed on wildlife by Firewise type programs, as also addressed by other commenters

#### **B. Findings required for approval of a conditional use permit.**

Section 2.26:12 describes mandatory findings.

"Prior to application approval of a conditional use, subdivision or short subdivision, the Board of Adjustment, Planning Commission, Board of Commissioners, or Short Plat Administrator shall make the following findings:

1. That there is a public need for the proposed use, subdivision or short plat.<sup>1</sup>
2. That the proposed use, subdivision or short plat complies with the adopted comprehensive plan.
3. That the property is suitable for the proposed use, subdivision or short plat.
4. That the public facilities and services to serve the use are adequate for the proposed use, subdivision or short plat."

All of these findings are required. We will look at them one by one.

1. That there is a public need for the proposed use. Under Canvas spends considerable time arguing that Klickitat County needs more tourist income. This is opinion, not fact. There may be an opportunity for additional tourist income, and tourist-related jobs, but it is in no way a fact that we need these jobs. One local business wrote in support of the project. Establishing the fact that we need more tourism income would require statistical analysis. The fact is that this project is on the west side of Klickitat County, where employment is readily available in jobs with benefits and year-around employment. Many of us regard the fact that Klickitat County has relatively low tourism income as a good thing. In any event it is clear from the many comments opposing the Under Canvas project that most do not share the opinion that we need more tourist industry.
2. That the proposed use complies with the adopted comprehensive plan. This may be true. I do not have access to a copy of the 1982 comprehensive plan which is the one I think is in force.

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<sup>1</sup> Economic arguments come in here.

3. That the property is suitable for the proposed use. The property is not suitable, for all the reasons discussed at length throughout this process. Inadequate road access, hot and dry environment without shade, site full of noxious weeds, no access to the river, not in proximity to major parks or recreation area, except the White Salmon River where available trips are limited by operator's permits, overload of intersection in Husum and further south on highway 141, and not consistent with the zone.
4. That public facilities and services are adequate. This project is served by a volunteer fire department for fire and medical emergencies. It will very likely strain the capacity of the fire district to provide services, especially emergency fire response, to the project. Adequate public services would include water and sewer, neither of which are available.

Very truly yours,

A handwritten signature in blue ink that reads "Patricia L. Arnold". The signature is written in a cursive style.

Patricia L. Arnold

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<sup>i</sup> Page 1 of the Conditional Use Application application says that "Safari tents are typically erected on prepared gravel beefs or raised wooden decks". Page 1, Conditional Use Application