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Scoping Comment #325

From: repar [redacted]@saw.net]
Sent: Monday, May 18, 2009 9:13 AM
To: CTED EFSEC
Subject: Whistling Ridge aka Saddleback--Repar
Importance: High
Attachments: Skamania County Comprehensive Plan (2007).pdf; SCP_Comp_Plan_25June2008.tif; SCP_Comp_plan_02July2008.tif; EFSEC_land use, etc._comments_17May2009.doc

Dear EFSEC,
Attached, please find my comments on land use consistency and scoping for the Whistling Ridge aka Saddleback wind farm project. Thank you.

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SKAMANIA COUNTY
2007 COMPREHENSIVE PLAN

FINAL
July 10, 2007

SKAMANIA COUNTY
2007 COMPREHENSIVE PLAN

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CHAPTER 1: INTRODUCTION

Purpose of the Comprehensive Plan

What is a Comprehensive Plan?

A Comprehensive Plan is an official public document that guides policy decisions related to the physical, social, and economic growth of a county. It provides a framework for future growth, development, and public decision-making. Generally, a Comprehensive Plan is a 20-year guide for the future of the county. A Comprehensive Plan provides direction for how the County will grow and evolve over time and establishes the goals and policies that the County should pursue to improve its quality of life, preserve and promote the community's assets, and ensure that Skamania County is an attractive, safe, and prosperous place to live and work, now and into the future. A Comprehensive Plan is not a regulatory document. Rather, it is a guiding document which includes goals and policies that are implemented through development regulations and other official controls.

What is a Subarea Plan?

A Subarea Plan is an official public document that guides policy decisions related to the physical, social, and economic growth of a specific portion of a county. A Subarea Plan is not a regulatory document. Rather, it is a guiding document which includes goals and policies that are implemented through development regulations and other official controls.

What is the Relationship of Subarea Plans to the County's 2007 Comprehensive Plan?

Currently there are four Subarea Plans in Skamania County [the Columbia River Gorge National Scenic Area (CRGNSA), Carson, the Westend, and Swift (pending adoption)]. Each of the Subarea Plans contains specific land use designations that are more detailed than those in the Comprehensive Plan. The land use designations in each subarea plan is controlling over the County's Comprehensive Plan land use designations of Rural 1, Rural 2 and Conservancy. However, in the CRGNSA Subarea, the Subarea Plan (Management Plan) is the controlling guidance document within that subarea. In all other Subareas the policies and guidance (other than land use) in the 2007 Comprehensive Plan is controlling.

What is the Relationship of the Comprehensive Plan to Zoning and Other "Official Controls"?

The relationship of the Comprehensive Plan to the zoning and other official controls is stated by the Washington State Planning Enabling Act's definition and authorization of development of official controls by a county. Official controls are legislatively defined and enacted policies, standards, detailed maps and other data, all of which control the physical development of a county or any part thereof or any detail thereof, and are a means of translating into regulations and ordinances all or any part of the general objectives of the comprehensive plan. Such official controls may include, but are not limited to ordinances establishing zoning, subdivision control, critical areas, shorelines, and any adoption of detailed maps. (RCW 36.70.020)

In addition, the Planning Enabling Act states, "Zoning maps as an official control may be adopted only for areas covered by a comprehensive plan containing not less than a Land Use Element and a Circulation (Transportation) Element." (RCW 36.70.720)

History of Planning in Skamania County

In 1969, the county retained the consultant firm of Barnard and Burk of Portland, Oregon, to prepare a land use plan. The completed plan was entitled Preliminary Land Use Plan, Skamania County 1969. The plan was primarily an inventory of existing conditions within the county. The basic purpose of the plan was to provide information on which future planning could be based. The plan summarized the existing land uses, conditions and general problems within each of the several community areas in the county. It recognized the limited amount of developable land and anticipated future development would follow established trends. This information was used as a basis for the 1977 Comprehensive Plan "A".

The County Planning Commission, originally established in 1966, was a ten-member commission with three members from each County Commissioner District and a member at-large. After changes to the Washington State laws, the Planning Commission is currently a seven-member commission with two members from each County Commissioner District and one member is at-large. The Planning Commission members are appointed to four-year terms by the County Commissioners. The Planning Commission reviews legislative map amendments and text amendments to Comprehensive Plans, Subarea Plans, and County Codes related to issues in land use planning. The Planning Commission makes recommendations to the Board of County Commissioners, which has the final legislative authority on those matters.

The Shoreline Master Program was adopted by Skamania County in 1974 and revised in 1986. The Shoreline Master Program is a comprehensive management plan for the shoreline streams and lakes within the County, which were designated as shorelines of

the state under the 1971 Shorelines Management Act. The Master Program defines the shoreline environments as Urban, Conservancy and Natural with Goals, Policies and Regulations for the management of the shoreline areas. The County is scheduled to adopt a revised Shoreline Master Program no later than December 1, 2012 to be consistent with the State of Washington.

The Board of Adjustment, established in 1985, was created to hold public hearings on conditional use permits, property line setback variances, appeals of administrative decisions on permits issued under the Skamania County Zoning Code, and appeals of administrative decision on permits issued under the Skamania County National Scenic Area Code. The decisions of the Board of Adjustment can be appealed to Superior Court (outside the National Scenic Area) and to the Columbia River Gorge Commission (inside the National Scenic Area). In 2007, the Board of Adjustment was replaced with the Hearings Examiner System. The Hearings Examiner renders decisions on all actions previously conducted by the Board of Adjustment and all quasi-judicial actions formerly conducted by the Planning Commission and Board of County Commissioners.

The Columbia River Gorge National Scenic Area was created on November 17, 1986 when President Reagan signed into effect Public Law 99-663. In 1987, the States of Oregon and Washington entered into a bi-state compact to form the Columbia River Gorge Commission. The Gorge Commission is a twelve member commission with three members appointed by the Governor of Washington State, three members appointed by the Governor of Oregon State, and six members (one each) appointed by the six Counties within the National Scenic Area (Multnomah County, Oregon; Hood River County, Oregon; Wasco County, Oregon; Klickitat County, Washington; Skamania County, Washington; and Clark County, Washington). After nearly four years of scenic, cultural, natural and recreational resource data collection and analysis, a Management Plan for the Scenic Area was adopted by the Columbia River Gorge Commission on October 15, 1991 and concurred upon by the U.S. Secretary of Agriculture on February 13, 1992. The Federal Act establishing the Columbia River Gorge National Scenic Area mandated that each county within the Scenic Area either adopt regulations to implement the Management Plan for their portions of the National Scenic Area or relinquish control of land development within the National Scenic Area to the Columbia River Gorge Commission. Prior to adoption of local regulations, Federal Interim Guidelines implemented by the Gorge Commission regulated development within the National Scenic Area. In 1994, Skamania County adopted development regulations that were deemed consistent with the Management Plan for the CRGNSA by the Gorge Commission and the U.S. Secretary of Agriculture. This approval allows for county administration and jurisdiction over these lands within Skamania County. The developments regulations were amended in 2006 to be consistent with the Revised Management Plan.

The Growth Management Act (GMA) was adopted in 1990 by the State of Washington. Skamania County is one of ten counties not required to fully plan under the GMA. The

GMA is listed in the Revised Code of Washington (RCW) as RCW 36.70A. The only sections of RCW 36.70A that apply to Skamania County are those sections relating to the designation and protection of Critical Resource Areas, and the designation of Agricultural, Forest and Mineral Resource lands, not already characterized by urban growth, that have long term commercial significance.

The first text amendment to the 1977 Comprehensive Plan "A" was adopted in 1991 with the creation of the Columbia River Gorge National Scenic Area Subarea Plan (the Management Plan). In 1994, the Carson Subarea Plan was the second text amendment to the original Comprehensive Plan. The addition of a Critical Areas text to the original Comprehensive Plan occurred in 1996. Appendix Item 1 provides a historical list of the text plan amendments to the 1977 Comprehensive Plan "A".

The first zoning codes for Skamania County were adopted between the years of 1989 and 1991. The first subdivision code in Skamania County was adopted in 1971 and the first short plat code was adopted in 1974. All of Skamania County's various development regulations have been amended over time since they were originally adopted.

Why Should We Update the Comprehensive Plan?

Counties evolve over time – the Comprehensive Plan should be a living document that is updated periodically to reflect changing development patterns, population, market and employment trends, and increased demand for services. Skamania County's existing and first Comprehensive Plan is the 1977 Comprehensive Plan "A", which is now 30 years old. Since then, the community has changed due to population growth, new residential development, the creation of the National Scenic Area, and changes in businesses and local industries. The Comprehensive Plan is being updated to reflect these changing conditions and to reassess population trends. Through the Comprehensive Plan, the County plans for its existing population as well as future population growth.

What Are the Benefits of a Comprehensive Plan?

A Comprehensive Plan is beneficial because it provides a road map for how a County will grow. Planning helps to produce better communities, healthier environments, and stronger communities. A well-planned community provides compatible land uses, a range of housing opportunities, an efficient and functional transportation network, and adequate public facilities and parks; and protects environmental and historic resources. The Comprehensive Plan is an effective management tool for elected officials. Additionally, the Comprehensive Plan provides greater predictability to private property owners, businesses, and developers in making long-term decisions about the future use and enjoyment of their property. The Plan can inform land investors by defining the

general location, direction, type, and extent of residential, commercial, and industrial development into the future.

Who Has Authority for Planning?

Skamania County's Comprehensive Plan is regulated under the Planning Enabling Act (RCW 36.70) and must contain at least a land use chapter and a circulation (transportation) chapter. The Comprehensive Plan must apply to any area that will have a zoning designation.

However, all counties and cities in the State of Washington must comply with those sections of the GMA relating to the designation and protection of Critical Resource Areas, and the designation of Natural Resource Lands Agricultural, Forest and Mineral Resource lands, not already characterized by urban growth, that have long term commercial significance. Most recently, GMA requires that counties and cities include the Best Available Science (BAS) in developing policies and development regulations to protect the functions and values of critical areas.

Planning Area

The original 1977 Comprehensive Plan "A" only guided development south of the southern boundary of the Gifford Pinchot National Forest, which is roughly the lower quarter of Skamania County. The following excerpt from the 1977 Comprehensive Plan "A" summarizes the reasoning for only including the southern portion of the County.

> This plan includes that portion of the County south of the Gifford Pinchot National Forest boundary, and the upper Wind River valley, and the upper Little White Salmon valley within the National Forest. The focus of the plan is land use and physical development. The plan is based on the soil capabilities and land ownership pattern, and the timber and wildlife resources. It represents a statement, which puts forth major ideas concerning the desirable future development of Skamania County. The plan identifies certain areas as more capable of supporting development or growth. An orderly physical development would be achieved by fostering growth in some areas, and limiting growth in others. In potential growth areas, or the more populated areas, local government will be encouraged to provide public improvements, such as roads, water supply and electrification. Along with this, a higher density will be allowed in growth areas. Public improvements and higher allowable densities will stimulate private development to locate in suitable areas. **Conversely, development in unsuitable areas will be discouraged by the plan.**

However, the pace of development in areas outside of the original planning area of the 1977 Comprehensive Plan has continued to increase. To provide for orderly future physical development of the entire county in a way that is suited to the unique natural

qualities of Skamania County and to preserve and enhance the quality of life we now have in Skamania County, the Planning Area for the 2007 Comprehensive Plan Update expands on the original 1977 Comprehensive Plan "A" to include all land geographically located within the boundaries of unincorporated Skamania County. Figure 1-1 shows the location of the 1977 Comprehensive Plan's Planning Area Boundary compared to the location of the 2007 Comprehensive Plan's Planning Area Boundary.

The majority of the land within Skamania County is under Federal ownership. The remaining land within Skamania County is in State and private ownership and is primarily contained within one of four Subareas: 1) the Columbia River Gorge National Scenic Area (CRGNSA), 2) Carson, 3) the Westend, and 4) Swift (pending adoption) (Table 1-1). The first three of these Subareas are located within one to one-and-a-half miles of the Columbia River. The CRGNSA includes approximately 90,204 acres spanning the entire width of the county along its southern border. The Carson Subarea – approximately 1,921 acres – is located just north and east of the City of Stevenson, Washington and it is the largest population center in the County. The Westend is approximately 68,383 acres and makes up the county's southwestern corner. Once adopted, the Swift Subarea – approximately 89,555 acres – will be the County's newest subarea; it is found on the western side of the county, nearly in the middle of its north-south length just south of Mt. St. Helens. A few areas of the unincorporated county lie outside one of these four Subareas such as the unincorporated communities of Mill A and Willard in the southeast, the unincorporated community of Stabler/Hemlock (northwest of Carson) and a small portion of private timber land in the County's most northwestern corner.

Table 1-1. Skamania County Comprehensive Plan Subareas, year of adoption, and approximate acreage.

Name of Subarea (year adopted)	Approximate Total Acreage
Columbia River Gorge National Scenic Area (1991)	90,204
Carson (1994)	1,921
Westend (2007)	68,383
Swift (pending 2007 adoption)	89,555

Public Participation

Who determines what is orderly development? There are many people and agencies involved in the process of development. The Board of County Commissioners, county departments, special districts, and state, federal, and tribal government agencies all play a part. Individual private citizens and special interest groups also play significant roles in determining how development takes place. The general public can have a major influence on development issues and decisions by the election of representatives,

by participation at public meetings and hearings, by participation on committees such as the Planning Commission. People should be concerned about development of the county, and are especially concerned when development may have an effect on their immediate environment.

One of the greatest challenges of governance is finding a balance between the interests of the community as a whole and those who have a special stake in a particular issue. Public participation helps to strike that balance by looking for solutions that work for the entire community, not just for a small group of individuals.

Although participating does not always mean prevailing, it does make government a partnership effort. That is something positive, because when citizens are actively involved in their government, the decisions can better reflect the will of the people. However, the final decision is made by the Board of County Commissioners who are elected by the will of the people.

Public Participation has been an ongoing component throughout the Comprehensive Plan Update process. Public outreach opportunities to date included the following:

- Public Hearing to adopt Public Participation Program (PPP) for Critical Areas (CA) Update – January 9, 2006
- Community Survey – pending Swift Subarea – February & March 2006
- Survey Results web posting and mailing – March 2006
- Wind River Watershed Meeting (CA update) – March 15, 2006
- Rock Creek Center CA update – March 29, 2006
- CA timeline Board of County Commissioners (BCC) public meeting – April 10, 2006
- Landowner Swift Vision Meeting – April 24, 2006
- Whole County Vision Meeting – April 25, 2006
- Agency Vision Meeting – April 26, 2006
- Cabin owner Swift Vision Meeting – April 26, 2006
- Tribal Agency Meeting – June 2, 2006
- Vision Report release and web posting - June 15, 2006
- CA Compliance Review BCC public meeting – June 19, 2006
- SCAT Meeting – pending Swift Subarea presentation and CA update – June 20, 2006
- Results of CA Compliance Review web posting and notice – June 21, 2006
- Wind River Watershed Meeting (CA update) – July 19, 2006
- Comment period for Swift Vision Statement and Map – September 2006
- BCC open house for Swift Vision Statement and Vision Map – September 4, 2006
- BCC Public hearing on amending the CA Public Participation Program – January 30, 2007
- Comment period for BCC Initiated draft – March 20, 2007 through May 1, 2007
- Planning Commission Workshop – April 17, 2007

- Planning Commission Public Hearing – May 1, 2007
- Planning Commission continued Public Hearing – May 22, 2007

Vision Statement

A vision statement expresses community values and ideas for the future. It depicts in words, images, or statements what the community seeks to become – how it will look, function, and evolve over time.

The overall vision statement of Skamania County is:

> "Skamania County is strongly committed to protecting our rural character and natural resource based industries while allowing for planned future development that is balanced with the protection of critical resources and ecologically sensitive areas, while preserving the community's high quality of life."

The vision statement is important to the Comprehensive Plan process, because it gives a big-picture view of Skamania County's community values and qualities. The Comprehensive Plan helps to realize this vision by addressing how Skamania County will develop over time and establishes the goals, policies and programs that the County should pursue to improve the quality of life, preserve and promote the County's rural assets, and ensure that Skamania County is a safe and prosperous place to live and work, now and into the future.

With its close proximity to the metropolitan Portland/Vancouver area and vast acreage of spectacularly diverse country, Skamania County is a focal point of year round recreational opportunities. Skamania County is home to the Gifford Pinchot National Forest, Mt. St. Helens National Volcanic Monument, Trapper Creek Wilderness Area, Indian Heaven Wilderness Area, the base of Mt. Adams, Columbia River Gorge National Scenic Area, Beacon Rock State Park, Pacific Crest Trail, Bonneville Dam, Bradford Island Visitor's Center, and the Columbia River Gorge Interpretive Center Museum, just to name a few. Recreational uses include boating, fishing, hunting, camping, hiking, snowmobiling, cross-country skiing, wildflower hiking tours, hot mineral springs day spas, golf courses, windsurfing, and kite boarding. In late 2005, there were three major destination resorts (Skamania Lodge/Conference Center, Bonneville Hot Springs Resort, and Carson Hot Springs Resort) operating in Skamania County.

The County is also pursuing funding and ideas for a future trails element that will include countywide integrated, multi-purpose trails linking communities and recreation destinations, furthering the goals of the Columbia River Gorge National Scenic Area and providing for increased tourism and recreation satisfaction. Skamania County should strive to improve recreational opportunities throughout the County including enhancing public access to the waterways.

Contents of the Plan

This Comprehensive Plan contains several "elements" or "chapters" each addressing important concerns in Skamania County:

Chapter 1:	Introduction
Chapter 2:	Land Use Element
Chapter 3:	Environmental Element
Chapter 4:	Transportation Element
Chapter 5:	Archaeology and Historic Preservation Element

Each of the chapters (2-5) includes goals and policies that are the essence of the Plan and are intended to be consulted to guide decisions on a wide range of issues, including permitting and resource allocation. It is important to remember that the goals and policies in this Comprehensive Plan are just as important as the maps in making land use and development decisions. To be consistent with the Comprehensive Plan, a project must also meet the intent of the Comprehensive Plan's policies, not just the land use designation and zoning classification.

As used in this plan, goals and policies are defined as follows:

- **Goal:** Goals are broad, general statements of the desired long-term future state toward which the Comprehensive Plan aims. They indicate what should exist in a community or what is desired to be achieved in the future. Goals are often considered to be the cornerstone of the planning process. A goal is an expression of an ideal and a desirable end. Over a period of time the goal remains constant yet it may never be completely attained.

- **Policy:** Policies describe a particular course or method of action to accomplish the purposes of the Comprehensive Plan. Policies are decision-oriented statements that guide the legislative or administrative body while evaluation a new project or proposed changes in the County ordinances.

Implementing the Plan

The Comprehensive Plan will be implemented through the actions of County staff, the Planning Commission, County Commissioners, Hearings Examiner, and other Boards or Commissions. Policies will be carried out through the adoption and revision of development regulations and ongoing decisions on future development proposals.

Amending the Comprehensive Plan

Long-range planning in Skamania County does not end with the adoption of this update. The Comprehensive Plan is a living document. In order to respond to changing conditions between Comprehensive Plan updates, the County allows periodic Comprehensive Plan Amendments. Property owners may apply for site-specific requests to amend the plan (quasi-judicial) or the Board of County Commissioners may initiate a plan amendment process (legislative). All amendments require public notice, a public hearing, and an evaluation of the environmental impacts in accordance with the State Environmental Policy Act (SEPA). Because the County is required to make its regulations consistent with the Comprehensive Plan, some Comprehensive Plan Amendments will require corresponding applications for zoning map amendments or zoning text amendments. Comprehensive Plan policies are intended to assist the County in determining whether to approve a Comprehensive Plan map and zoning map amendments consistent with the County Vision.

Only through continuing use, evaluation, and when necessary, amendment to the Comprehensive Plan can the County move toward the Vision.

Legislative Amendments to this Comprehensive Plan (reassessment or update)

Comprehensive Plans and subarea plans are not written for all time. They are living documents designed to be at once rigid enough to hold a chosen course over an extended period of new growth and development, yet flexible enough to accommodate a wide variety of anticipated and unforeseen conditions. A fundamentally good plan can do this for a relatively short period of time (20 years), during which monitoring, data gathering and analysis for the purposes of "fine tuning" and improving the plan by amendment should be an ongoing process. At the end of this period Skamania County should conduct a major reassessment of the plan. Typically, at least every seven years the county is required to review the Critical Areas portion of the Comprehensive Plan to determine the need for a legislative update.

Procedures for accomplishing individual Comprehensive Plan Amendments (quasi-judicial)

The comprehensive land use plan (or subarea plan) and all development regulations (official controls) shall be subject to continuing review and evaluation by Skamania County (County) and its citizens. The conclusion of a plan amendment cycle shall occur annually unless no amendments are proposed. A plan amendment cycle means the timeframe when plan amendments are submitted by the applicant (generally the property owners) to the Planning Department, scheduled for public hearing, reviewed and decided upon by the Hearing Examiner (See timeframe below). The applicant can resubmit plan amendments that have been denied by the Hearing Examiner no sooner

than three years from the date of denial. Plan Amendments do not constitute an emergency (i.e., an immediate threat to life or property for which action must be taken to alleviate the threat).

The Comprehensive Plan Amendment Cycle and review process is as follows:

1. All comprehensive plan amendment applications must be completed by the applicant (signed by the applicant and property owners) and submitted to the Planning Department on or before December 31st of each calendar year.
2. The comprehensive plan amendments will then be placed on the Hearing Examiner's schedule for public hearing at either the following April (east county), May (mid county) or June (west county) meeting.
3. The Planning Department will provide written analysis of each plan amendment to the Hearing Examiner for review.
4. The Hearing Examiner will then hold at least one public hearing to consider and act upon the original application.

A complete application for quasi-judicial comprehensive plan amendment must be submitted in writing and include the following:

1. A completed State Environment Policy Act (SEPA) checklist and application fee (as set by the Board of County Commissioners);
2. Comprehensive Plan Amendment Fee (as set by the Board of County Commissioners);
3. Responses to the following:
   a. Description of the requested Plan Amendment;
   b. An explanation of why the amendment is being proposed including specific areas of the comprehensive plan needing changes;
   c. Draft text amendment language, if appropriate;
   d. An explanation of how the criteria in 4 (below) are met by the proposal;
4. Criteria against which the proposed amendment must be evaluated and found to be in substantial compliance for approval:
   a. A text and/or map amendment is necessary to resolve inconsistencies within the County Comprehensive Plan with which the county has no objection;
   b. Conditions have significantly changed since the adoption of the Comprehensive Plan or Official Controls to the extent that the existing adopted plan provision or map designation is inappropriate. Examples of significantly changed conditions include, but are not limited to: 1) sixty percent (60%) infill of existing lots within the entire mapping designation being proposed for change; or 2) new technology and uses not originally considered in the text have been developed;
   c. The proposed text and/or map amendment is consistent with the overall intent of the goals, maps, and land use element of the Comprehensive Plan;

d. The proposed text and/or map amendment is consistent with RCW 36.70, those sections of RCW 36.70A to which Skamania County is required to plan under, and Comprehensive Plan policies;

e. Additionally, for an amendment to the Comprehensive Plan or any Subarea Plan Map, the proposed designation must be contiguous along a shared boundary to the requested comprehensive plan or subarea plan designation by at least 100 feet or 25% of the width of the property proposed to change, whichever is greater;

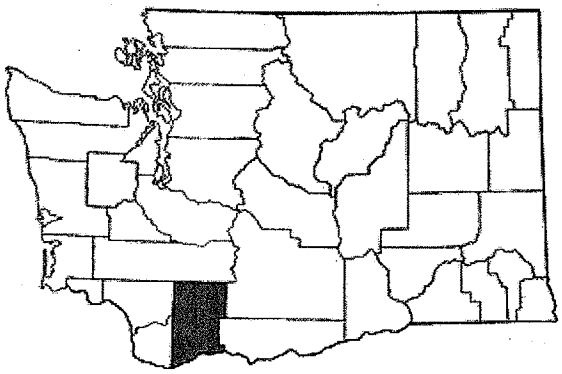
f. Environmental impacts have been disclosed and measures imposed to avoid or, if not possible to avoid, then mitigate said impacts; and,

g. The applicant should examine potential ramifications of the proposed text and/or map amendment to other Comprehensive Plan Elements and official controls and show how the potential ramifications have been considered and addressed.

Skamania County Statistics and Population Data

Skamania County is located in southwestern Washington (Figure 1-2). The Columbia River forms its southern border and is also the border between the states of Washington and Oregon. Mt. St. Helens is located near the northwestern corner of the county and Mt. Adams is located near the northeastern corner. State Route 14 (SR 14) is the main road in the county; it runs in east/west direction along the Columbia River. Skamania County is the only county in Washington State that spans the crest of the Cascade Mountain Range. The county runs about forty miles east and west along the Columbia River and extends over fifty miles northward into the heart of the Gifford Pinchot National Forest. The City of Stevenson is the county seat.

Figure 1-2. Skamania County, Washington location map



Skamania County covers approximately 1,672 square miles, or 1,070,080 acres, including approximately two-thirds of the 1,368,300-acre Gifford Pinchot National Forest. Much of the southern portion of the County lies within the Columbia River

Gorge National Scenic Area (CRGNSA). The cities of North Bonneville and Stevenson are the only two incorporated areas of the county. They are both situated on the north shore of the Columbia River in southern middle of the County. There are also two CRGNSA unincorporated urban areas (Carson and Home Valley) located east of Stevenson. State-owned lands of 59,876 acres are also found in the County. Table 1-1 provides a breakdown of the land distribution and population based on the Office of Financial Management's (OFM) April 1, 2006 report. 8,457 (or 79.8% of the total population) people of Skamania County reside outside of the incorporated cities.

Table 1-1. Skamania County land distribution and population.

Location	Approximate Area in Acres	Approximate Area in Square Miles	OFM Population as of April 1, 2006
County	1,070,080	1,672.00	10,600
Gifford Pinchot National Forest	855,000	1,335.94	
State Owned Land	59,876	93.56	
NSA (GMA/SMA only)	85,204	133.13	
City of Stevenson	941	1.47	1,315
City of North Bonneville	1,581	2.47	828
Carson	1,921	3.00	
Home Valley	557	0.87	
Swift Subarea (pending adoption) (private ownership only)	34,000	53.13	
Westend Subarea (private ownership only)	31,000	48.43	
Total	1,070,080	1,672.00	10,600

The Washington State Office of Financial Management (OFM) has the responsibility to project population growth rates for local Growth Management Act (GMA) planning purposes. OFM projections are the basis upon which the cities and counties work to identify the amounts and locations of land that will be needed for conversion to housing as growth occurs. Table 1-2 presents the historic population growth of Skamania County between the years 1900 and 2000. The incorporated cities of North Bonneville and Stevenson are also included in Table 1-2.

Table 1-2. Historic Population Growth (OFM, January 2002)

		1900	1910	1920	1930	1940	1950	1960	1970	1980	1990	2000
Skamania County		1,688	2,887	2,357	2,891	4,633	4,788	5,207	5,845	7,919	8,289	9,872
Stevenson			387	348	400	563	584	927	916	1,172	1,147	1,200

North Bonneville						643	564	494	459	432	431	593

The OFM estimates that Countywide (including the cities of Stevenson and North Bonneville, the County's population will increase by approximately 4,903 people by the year 2025. Skamania County's growth rate is projected at 1.6% annually until the year 2025, as shown in Table 1-3. However, these numbers are estimates and unforeseen circumstances could cause a greater increased rate in population growth or could result in a reduced rate of population growth.

Table 1-3. Projected Growth High Rate (OFM, January 2002)

	2010	**2015**	**2020**	**2025**
Skamania County	12,368	13,429	14,467	15,503

Approximately 79.8% of these people, totaling 3,913 people are expected to reside in Skamania County's unincorporated areas. Based on the 2000 Census Data, the OFM determined that Skamania County has an average household size of 2.612 people per residence. Therefore, an additional 1,498 residences will need to be added to Skamania County's unincorporated areas by the year 2025 in order to house the projected future growth at the OFM high rate. A minimum of 84 new residences would need to be constructed each year until 2025 to meet the housing needs of the projected population growth. Building permit records indicate that over that last three years, Skamania County has issued an average of 112 permits per year for the construction of new residences in the unincorporated areas. If this trend continues, the addition of 1,498 new residences by 2025 could easily be met.

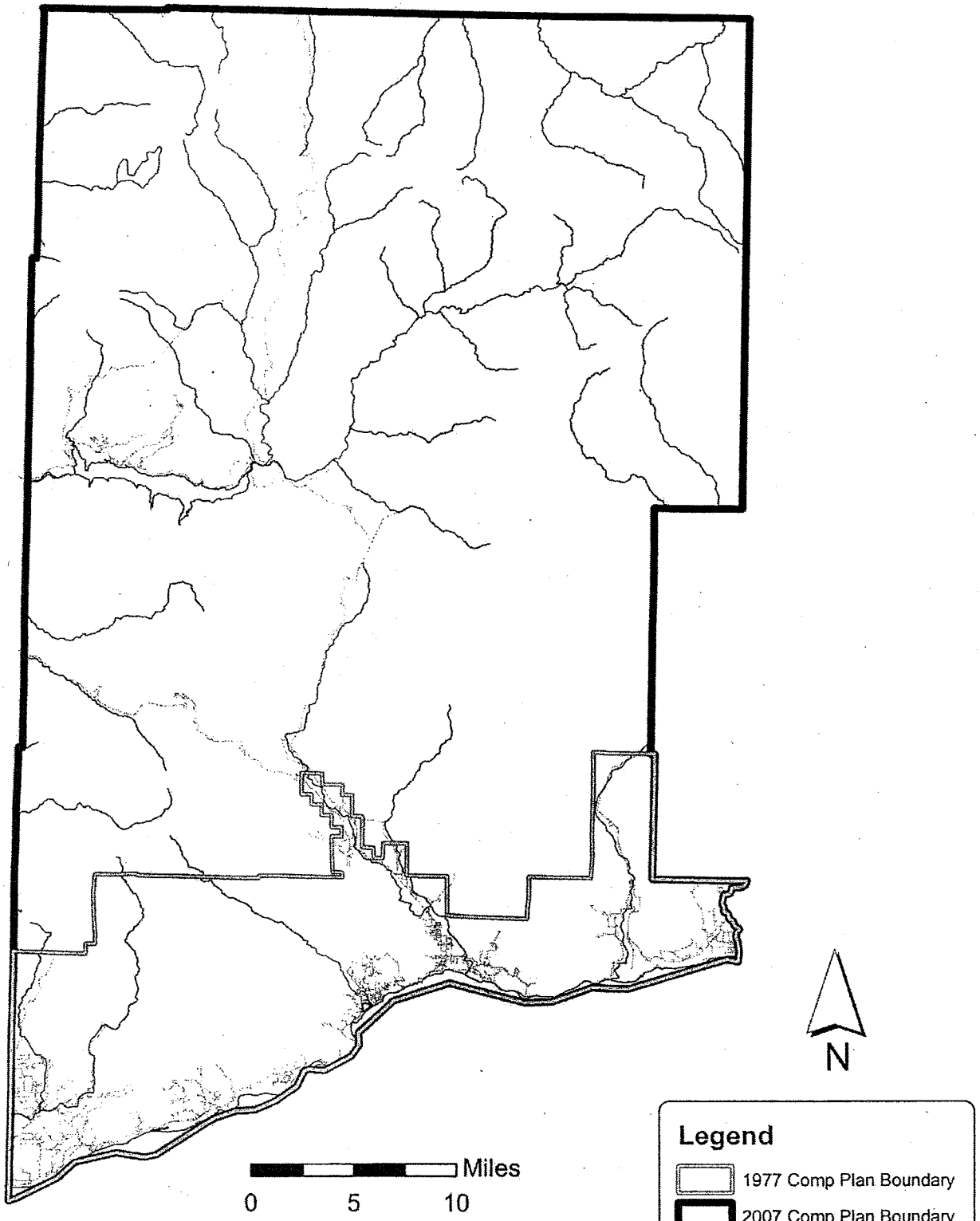
The population growth is expected to continue to occur in the four urban areas (City of Stevenson, City of North Bonneville, the unincorporated area of Carson and the unincorporated area of Home Valley), the Westend Subarea, and minimal increases in the Columbia River Gorge National Scenic Area Subarea. These areas have the necessary infrastructure to support an increase in population growth. The other rural areas of Skamania County, including the Swift Reservoir Area currently do not have the necessary infrastructure and county services to accommodate large increases in full time residential population growth. Urban services are not available in many locations of Skamania County.

Skamania County is a rural community and proud of the country lifestyle and heritage that is offered in this region. Rural living can take some adjusting to and is often very different from urban expectations. A key element of country life is self-reliance. It is important to understand that county governments are not always able to provide the same level of service in undeveloped, rural and remote areas as they do inside urban or developed areas adjacent to cities. The fact that property is accessible during the summer months does not necessarily guarantee the owners, guests or emergency service vehicles can achieve that same level of access at all times of the year. Even

though rural property owners pay property taxes to the county, the amount of tax collected does not cover the costs of services provided to rural residents. The results of fifteen years of research by the American Farmland Trust (AFT), academic researchers, extension economists, planners, researchers from private organizations and public agencies were published in 2002 in a report titled *Cost of Community Service Studies.* This nation wide report generally shows that tax and other revenues collected from farm, ranch and forest landowners, on average, more than covered the public service costs these lands incur ($0.36 in average costs for every $1.00 collected), while residential developments cost more to serve than they collect in revenue ($1.15 in average costs for every $1.00 collected). The results of the studies generally show that in the short term, residential development increases the tax base by adding property value, but in the long term open land (farm, ranch and forest land) requires a lower level of public service than residential development, thus limiting the cost increases to governmental budgets. Rural residents need to appreciate what service the county can provide and realize that country living does insure some inconveniences.

The County budget has nearly 50% of its current expense (general fund) funding provided by payments from the Federal Secure and Rural School and Community Self-Determination Act. That funding expired at the end of 2006 (payment received in 2007). Unless the reauthorization of this federal funding source, or some other alternative funding source is found, there will be drastic reductions to the level of services provided by the County.

Figure 1-1. 2007 Comprehensive Plan Boundary



DISCLAIMER: This map product was prepared by Skamania County and is for information purposes only. It may not have been prepared for, or be suitable for legal, engineering, or surveying purposes. Users of this information should review or consult the primary data and information sources to ascertain the usability of the information.

CHAPTER 2: LAND USE ELEMENT

Introduction

The Land Use Element of the Skamania County 2007 Comprehensive Plan provides policy guidance for the uses of land throughout the entire unincorporated county, which range from residential, commercial and industrial structures to farm and forestry activities, to open spaces and undeveloped environmentally sensitive areas. The goals and policies contained in the Land Use Element provide the guidance as to how and where these uses should be located, and what type of overall land use pattern should evolve as Skamania County develops over the next 20 years. However, because of several unique conditions and policy issues, the analysis and policies for each of the four subareas are contained in separate subarea plans. Figure 2-1 shows the geographical location of the four subarea plans within Skamania County.

The Comprehensive Plan provides the overall community vision, goals, and general policies for future development in Skamania County. It does not, however, provide all the details. Precise standards, such as building setbacks, permitted uses within a particular zoning district or appropriate types of stormwater management systems are included in the various implementing ordinances (official controls).

The Land Use Element provides a guide to public development toward which public utilities and public services planning can be directed and provides a guide to private development by indicating those areas most suitable and economical for development.

Land Use Designations

There are three (3) land use designations in unincorporated Skamania County, outside of the specific subarea plans. These three designations are Rural I, Rural II, and Conservancy, and are differentiated from one another by intensity and types of uses, which may occur in each area. The idea of three different developmental areas was the central concept of the 1977 Comprehensive Plan "A" and has been continued in the 2007 Comprehensive Plan.

Table 2-1 shows the comprehensive plan designations and the consistency of each potential zoning classification. The Plan Designation to Zoning Classification table is provided to identify those zoning districts that are consistent with each plan designation. Those districts, which are not consistent with the plan designations, are not permitted within that plan designation. This information is necessary to determine when, where and under what circumstances these designations should be applied in the future. The table indicates consistency (C) and non-consistency (NC).

Table 2-1. Plan Designation to Zoning Classification Consistency Chart

Zoning Classifications	Comprehensive Plan Designations		
	Rural I	**Rural II**	**Conservancy**
Residential 1 (R-1)	C	NC	NC
Residential 2 (R-2)	C	C	NC
Residential 5 (R-5)	C	C	NC
Residential 10 (R-10)	C	C	C
Rural Estates 20 (RES-20)	C	C	C
Community Commercial (CC)	C	NC	NC
Commercial Recreation (CR)	C	NC	NC
Industrial (MG)	C	NC	NC
Forest Land 20 (FL20)	C	C	C
Commercial Resource Land 40 (CRL40)	C	C	C
Natural (NAT)	C	C	C
Unmapped (UNM)	C	C	C

Rural I

The Rural I land use area is intended to foster the optimum utilization of land within the growing areas of the county through provision of public improvements and the allocation of a greater variety of uses than allowed in the other two land use designations. As shown in Table 2-1, all zoning classifications are consistent with Rural I Designations. To provide protection of rural character and separation of incompatible uses, the actual allowable uses, review uses and conditional permitted uses will be further refined in each specific zoning classification (official controls).

The Rural I land use area is that area which is best able to support growth. All of the existing, denser development is within this area. The character of this existing development is essentially rural, and it is not the intention of the plan to significantly alter this character. However, the potential for future development is greater here than other lands within the county. The natural limitations are fewer and water systems, roads and electricity serve most areas. More varied and denser development could take place within this land use category. Therefore, growth in these areas would be encouraged.

The following uses, depending upon on adopted zoning classifications, are appropriate within the **Rural I designation**:

1. Residential (Single, duplex or multi family units)
2. Accessory uses normally associated with an authorized use
3. Home business (cottage occupations or light home industry)
4. Mobile home parks

5. Recreational vehicle parks
6. Motels and hotels
7. Commercial (light or heavy)
8. Office (professional services)
9. Industry (light or heavy)
10. Public facilities and utilities, such as parks, public water access, libraries, schools, utility substations, and telecommunication facilities
11. Hospitals, residential care facilities, childcare facilities, private schools, safe homes, and religious facilities
12. Meeting halls, such as civic, social and fraternal organizations
13. Agriculture (domestic or commercial)
14. Forest management
15. Surface mining; by conditional use permit approval only

The minimum lot sizes and dimensions of any parcel within the Rural I designation shall be as follows, unless the specific land use zoning classification or the Local Health Authority requires a larger lot size:

1. Where water supply is individual wells and individual sewage disposal systems are used, the minimum lot size shall be two acres. Minimum lot width shall be two hundred feet.
2. Where adequate public water supply and individual sewage disposal systems are used, the minimum lot size shall be twelve thousand five hundred square feet. Minimum lot width shall be ninety feet and minimum lot depth shall be one hundred and twenty feet.
3. Where adequate public water supply and adequate public sewer lines are used, the minimum lot size shall be eight thousand square feet. Minimum lot width shall be seventy feet.

Rural II

The Rural II land use area is intended to provide for rural living without significant encroachment upon lands used for agriculture and timber. This land use area is the middle developmental range level suggested by this plan. The lower density will help to protect agricultural and timber lands from dense residential type development, and should maintain the rural character of this designation.

Not many people in Skamania County sustain themselves by farming exclusively. There are a few dairy farms and orchards scattered throughout the county, and some families grow much of their own food.

Rural II areas are considered suitable for more widely dispersed residential uses compatible with natural land limitations and resource potentials. This land use category

would provide for rural living without significantly encroaching upon agricultural and timberlands.

The following uses, depending upon on adopted zoning classification, are appropriate within the **Rural II designation**:

1. Residential (Single, duplex or multi family units)
2. Accessory uses normally associated with an authorized use
3. Home business (cottage occupations or light home industry)
4. Mobile home parks
5. Recreational vehicle parks
6. Public facilities and utilities, such as parks, public water access, libraries, schools, utility substations, and telecommunication facilities
7. Hospitals, residential care facilities, childcare facilities, private schools, safe homes, and religious facilities
8. Meeting halls, such as civic, social and fraternal organizations
9. Agriculture (domestic or commercial)
10. Forest management, including temporary logging and mining camps
11. Surface mining; by conditional use permit approval only

The minimum lot size in the Rural II areas shall be two acres, unless the specific land use zoning classification or the Local Health Authority requires a larger lot size.

Conservancy

The Conservancy land use area is intended to provide for the conservation and management of existing natural resources in order to achieve a sustained yield of these resources, and to conserve wildlife resources and habitats.

Much of the Conservancy land use area is characterized by rugged terrain, steep in slope, and unsuitable for development of any kind. Logging, timber management, agricultural and mineral extraction are main use activities that take place in this area. Recreational activities of an informal nature such as fishing, hunting, and hiking occur in this area, although formal recreational developments may occur from time to time. Conservancy areas are intended to conserve and manage existing natural resources in order to maintain a sustained resource yield and/or utilization.

The following uses, depending upon on adopted zoning classifications, are appropriate within the **Conservancy designation**:

1. Residential (Single family units)
2. Accessory uses normally associated with an authorized use
3. Home business (cottage occupations or light home industry)
5. Recreational vehicle parks

6. Public facilities and utilities, such as parks, public water access, libraries, schools, utility substations, and telecommunication facilities
7. Residential care facilities, childcare facilities, private schools, safe homes, and religious facilities
8. Meeting halls, such as civic, social and fraternal organizations
9. Agriculture (domestic or commercial)
10. Forest management, including temporary logging and mining camps
11. Surface mining; by conditional use permit approval only
12. Aircraft landing strips

The minimum lot size in the Conservancy Area shall be ten acres, unless the specific land use zoning classification or the Local Health Authority requires a larger lot size.

Land Use Element Goals and Policies

Goal LU.1: To integrate long-range considerations (comprehensive planning) into the determinations of short-term action (individual development applications).

Policy LU.1.1: The land use policy framework and planning process should be utilized as a basis for all decisions and actions related to land use and to assure that such decisions and actions are based on factual information.

Policy LU.1.2: The plan is created on the premise that the land use areas designated are each best suited for the uses proposed therein. However, it is not the intention of this plan to foreclose on future opportunities that may be made possible by technical innovations, new ideas and changing attitudes. Therefore, other uses that are similar to the uses listed here should be allowable uses, review uses or conditional uses, only if the use is specifically listed in the official controls of Skamania County for that particular land use designation.

Policy LU.1.3: The comprehensive planning policies set out herein and all land use designations and land use regulations undertaken pursuant hereto should provide clear and objective standards to govern future development. These policies, designations and regulations should not be varied or amended without proof of a substantial change in circumstances.

Goal LU.2: To provide for orderly future physical development of Skamania County.

Policy LU.2.1: All zoning regulations and other implementing regulations shall be consistent with and guided by the comprehensive plan or specific subarea plan maps and policies.

Policy LU.2.2: All land in unincorporated Skamania County shall be classified with a land use designation as shown on the 2007 Comprehensive Plan Land Use Map (Figure 2-2), or the specific Subarea Plan map designations

(Columbia River Gorge National Scenic Area Subarea, Carson Subarea, Westend Subarea, or Swift Subarea [pending adoption]). Any unincorporated area within Skamania County that was not designated with a 1977 designation of Rural I or Rural II; or with a specific adopted Subarea Plan designation is designated as Conservancy, except the Wind River Nursery site is designated as Rural I.

Policy LU.2.3: Parcels of land which do not meet the minimum lot sizes set out in this comprehensive plan (or any specific subarea plan) and any ordinance implementing this plan, and which were lawfully created prior to adoption of this plan or any zoning ordinance(s) implementing this plan, may be developed subject to all regulations other than those governing minimum lot sizes and dimensions that are in effect at the time a development application is filed.

Policy LU.2.4: Encourage new commercial enterprises to locate within or near existing commercial areas to avoid further scattering and to better serve the public.

Policy LU.2.5: Land use patterns should follow along roads, rivers, township lines, range lines, section lines or quarter section lines rather than individual parcel lines to provide for uniform regular boundaries between land use designations.

Policy LU.2.6: Building permits, septic tank permits, or other development permits issued by the County for any project will be in conformance with this Comprehensive Plan.

Policy LU.2.7: County improvement projects (public works, roads, parks, etc.) will comply with the policies, regulations and designated land uses of the Comprehensive Plan.

Policy LU.2.8: Local governments and agencies should consider the Rural I area for public improvements over other areas.

Policy LU.2.9: Provide for community level recreational needs and open space by promoting acquisition of lands for small parks in areas where future build-up is expected to occur.

Policy LU.2.10: Multiple contiguous short plats should be processed as one "project" under the subdivision regulations, based on ownership patterns that existed in 1996.

Policy LU.2.11: The land division exemption by deed should be increased to a minimum of forty (40) acres.

Policy LU.2.12: The County short plat and subdivision regulations should be updated and a process for authorizing certificates of exemption should be included.

Goal LU.3: To coordinate public and private interests in land development.

Policy LU.3.1: Improvements, both public and private, should be made intelligently and efficiently, and have a wholesome effect upon the communities.

Policy LU.3.2: Promote the revitalization of older or declining areas to capitalize on existing public investments (water systems, streets, electrification, telephone service, etc.) and private investments (buildings, driveways, landscaping, etc.).

Policy LU.3.3: Encourage industry that would have minimal adverse environmental or aesthetic effects.

Goal LU.4: To promote interagency cooperation and effective planning and scheduling of improvements and activities so as to avoid conflicts, duplication and waste.

Policy LU.4.1: Land use permitting processes should be simplified and streamlined to the maximum extent possible.

Policy LU.4.2: The Skamania County Parks and Recreation Master Plan shall be the guiding document for future park improvements, however, those improvements are subject to other regulations including but not limited to: zoning, critical areas, shorelines, and land divisions.

Policy LU.4.3: Land use patterns, which minimize the cost of providing adequate levels of public services and infrastructure, should be encouraged.

Policy LU.4.4: Cottage occupations and light home industries should be encouraged in Rural Designations to the extent that they will not require public investment in infrastructure greater than that normally required for residential use of the density allowed in the land use designation.

Policy LU.4.5: Federal and State agencies will be requested to consider the County Comprehensive Plan prior to implementing projects.

Policy LU.4.6: Special districts and organizations such as the Economic Development Council, Port District, School Districts, and Fire Districts, should coordinate proposed programs and projects with the Comprehensive Plan prior to implementation, and these organizations should coordinate any general or overall plans with the Comprehensive Plan.

Policy LU.4.7: Projects needing shorelines permits shall be required to be in conformance with the standards and purposes of the Shorelines Master Program.

Policy LU.4.8: In the event of a conflict between the Shorelines Master Program and the Comprehensive Plan, the Shorelines Master Program shall take precedence.

Policy LU.4.9: Skamania County and the cities should seek opportunities for joint efforts, or the combing of operations, to achieve greater efficiency and effectiveness in service provision.

Goal LU.5: To promote improvements which make our communities more livable, healthy, safe and efficient.

Policy LU.5.1: All plats, short plats, development permits, and building permits issued for development activities on, or within five hundred feet of, lands designated as Conservancy should contain a notice that the subject property is within or near designated agricultural lands, forest lands, or mineral resource lands on which a variety of commercial activities may occur that are not compatible with residential development for certain periods of limited duration. The notice should also inform that an application might be made for mining-related activities, including mining, extraction, washing, crushing, stockpiling, blasting, transporting, and recycling of minerals.

Policy LU.5.2: All development will conform to all Federal, State and local requirements.

Policy LU.5.3: Nuisance, noise, and solid-waste ordinances should be strictly enforced by the appropriate County Departments.

Policy LU.5.4: Surface water run-off (including stormwater run-off) from developments should be reduced by: encouraging the retention of natural vegetation or the provision of landscaped areas; encouraging the retention, creation and utilization of wetlands; requiring that natural drainage ways be maintained in all new developments and include appropriate setbacks; and, encouraging on site retention/detention of all stormwater.

Policy LU.5.5: Promote compatibility of industry with the surrounding area or community by fostering good quality site planning, landscaping, architectural design, and a high level of environmental standards.

Policy LU.5.6: Encourage commercial development that is convenient, safe and pleasant to the general public by: requiring that new establishments provide off-street parking adequate for its needs. Encourage pooled or joint use parking areas for adjacent developments may be utilized; Regulate access points for vehicular traffic for commercial areas to prevent unsafe conditions; the design of commercial sites, buildings, and signs should be compatible with surrounding areas; and, landscaping may be required as a buffer when commercial use adjoins residential or farm property.

Policy LU.5.7: Adequate on-site wells and septic systems should be properly installed, monitored and maintained in accordance with local and state health department requirements.

Policy LU.5.8: Recognize volunteer fire protection, volunteer emergency services, and County law enforcement protection as appropriate services in rural areas.

Policy LU.5.9: The Board of County Commissioners, as legislative authority, shall consult this Plan on any matters concerning physical development of the County, and in dealing with matters coming before it with regard to this Plan.

Policy LU.5.10: In all designations a variety of housing types and building concepts such as the "cluster development" should be encouraged and should

be allowed provided the criteria for cluster developments listed in the official controls is met. This is a concept that permits more flexible site design and clustered housing with compensating open spaces that are in keeping with the density objectives of the comprehensive plan. However, any land division utilizing the cluster development concept should not be allowed to be granted a change of Comprehensive Plan designation or zoning classification for a minimum of ten (10) years from the date of recording the land division. All clustered lots within the land division should be at least a minimum of two (2) acres in size and the total number of allowable lots within the land division should not exceed the overall density set by the comprehensive plan designation and the zoning classification. Additionally, all open space/common areas should be owned in common by all landowners within the land division, with each landowner listed on the deed.

Policy LU.5.11: Support and encourage innovative solutions to locating affordable housing and workforce housing within all zoning classifications through the Conditional Use Permit process. The County is committed to working with all partners (cities, state, federal agencies, etc.) to achieve this policy. The location of shopping areas or other community facilities such as parks and schools should be taken into account when reviewing conditional use permits for affordable housing and workforce housing.

Policy LU.5.12: Developments within the built-up areas should encourage, were possible, pedestrian and bike pathways that makes walking a desirable alternative to driving automobiles. The design of private roads should discourage through traffic in residential areas. Loops, cul-de-sacs, and "T" intersections should be utilized.

Goal LU.6: To provide opportunities for citizen participation in the government decision process and in planning activities regarding land development.

Policy LU.6.1: Three types of uses should be established for each land use designation under this plan and for any zone established to implement this plan. If any use is not listed as one of the following types of developments, then the use is prohibited within that land use designation:

a. Allowable uses which are permitted without review by the Planning Department except for compliance with setbacks, buffer requirements, critical area regulations, the State Environmental Policy Act and the Shorelines Management Master Program;
b. Review uses, which are allowed, with administrative review by the Planning Department for consistency with standards placed upon those uses, with appeal to the Hearing Examiner; and,

c. Conditional uses, which are subject to review and approval or denial by the Hearing Examiner, with appeal to Superior Court. The Hearing Examiner may deny a conditional use permit if he or she finds the use is inappropriate for the area.

Policy LU.6.2: In the development regulations, land uses which are neither allowed without review by the Planning Department, permitted subject to conditions, nor named as conditional uses under a land use designation made in this plan or in an ordinance implementing this plan should be prohibited without proof of a substantial change in circumstances sufficient to justify amendment of this plan or implementing ordinance.

Figure 2-1. Geographical Location of Subareas

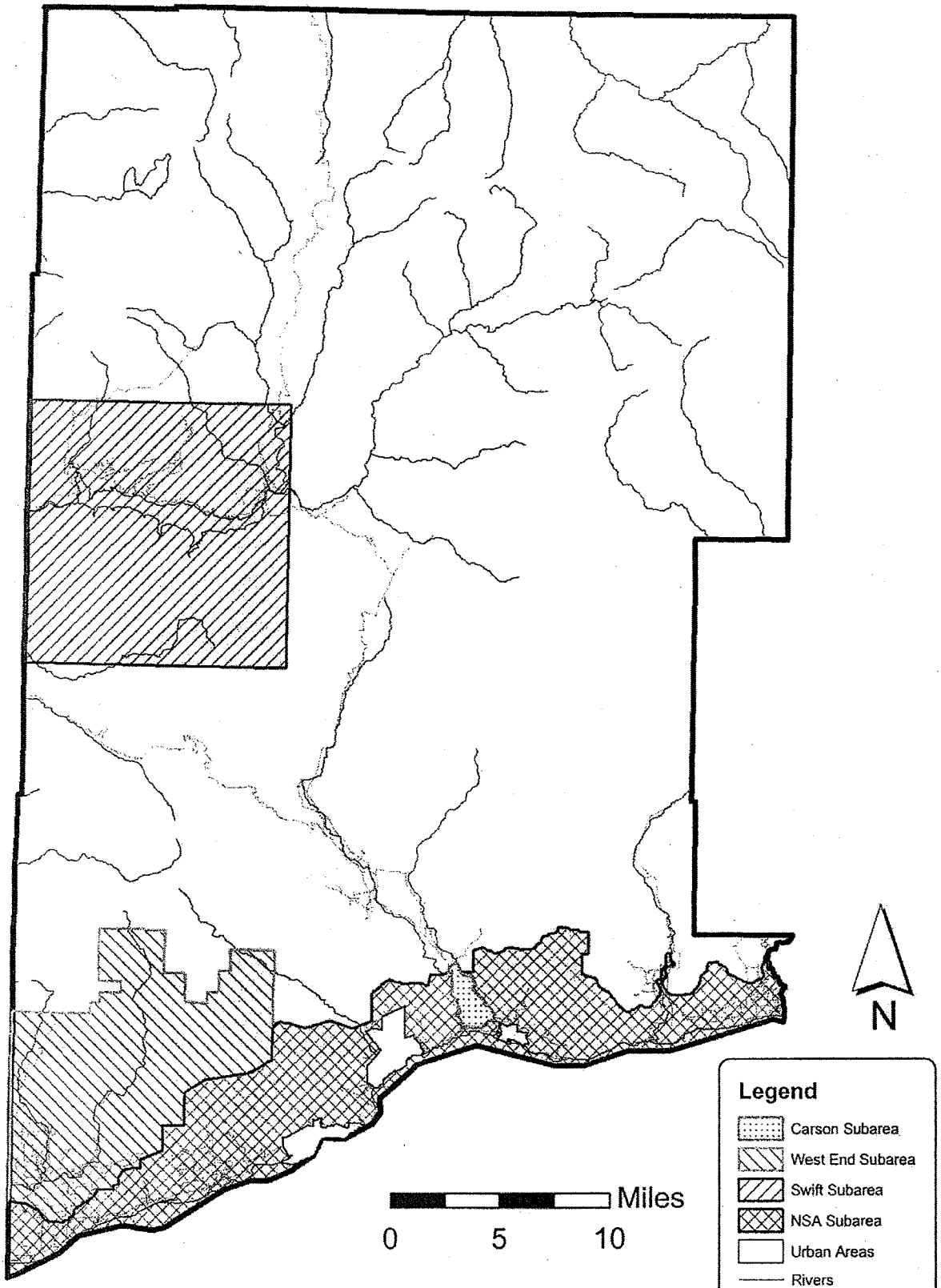


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Figure 2-2. 2007 Comprehensive Plan Land Use Designation Map

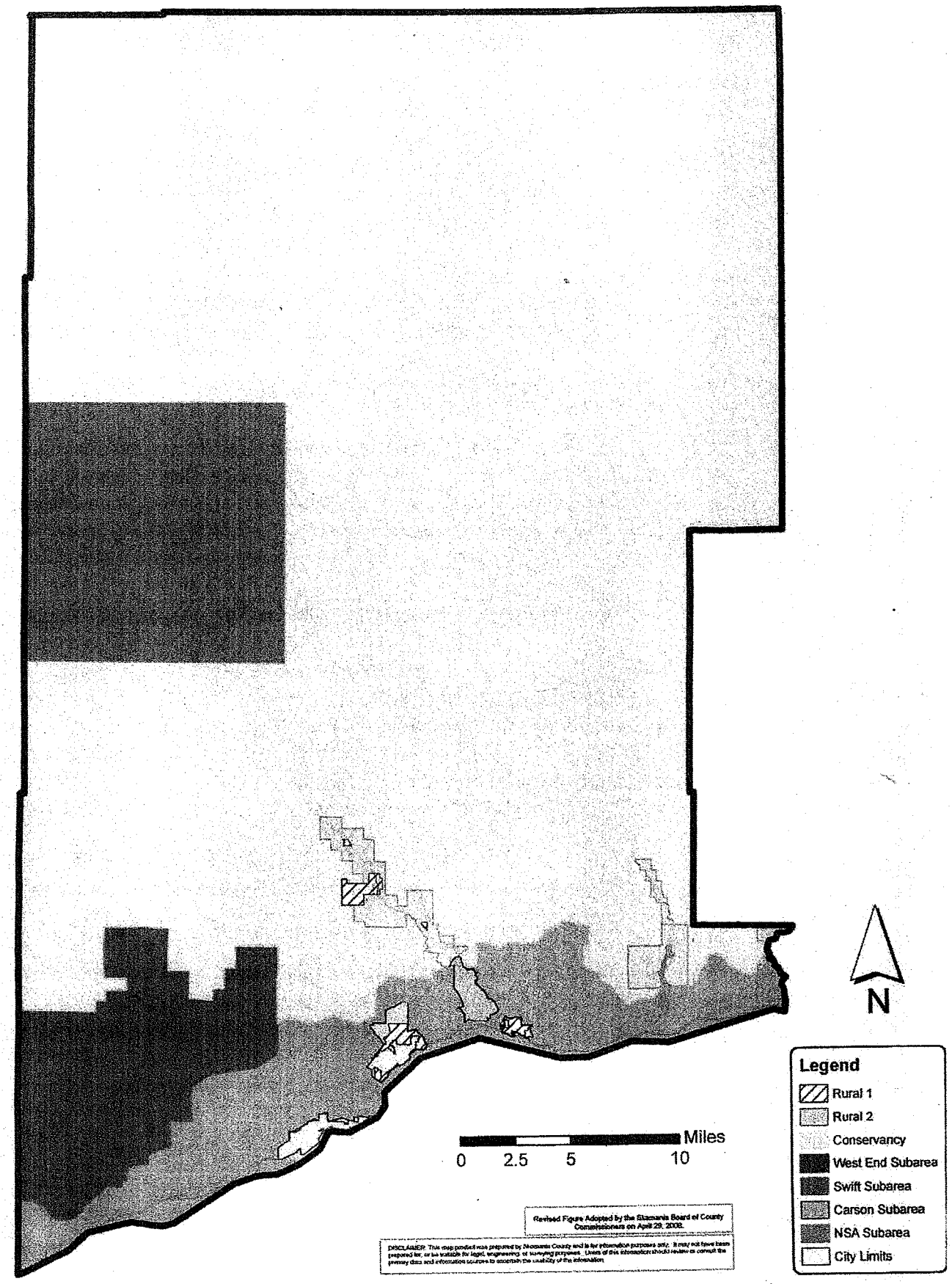
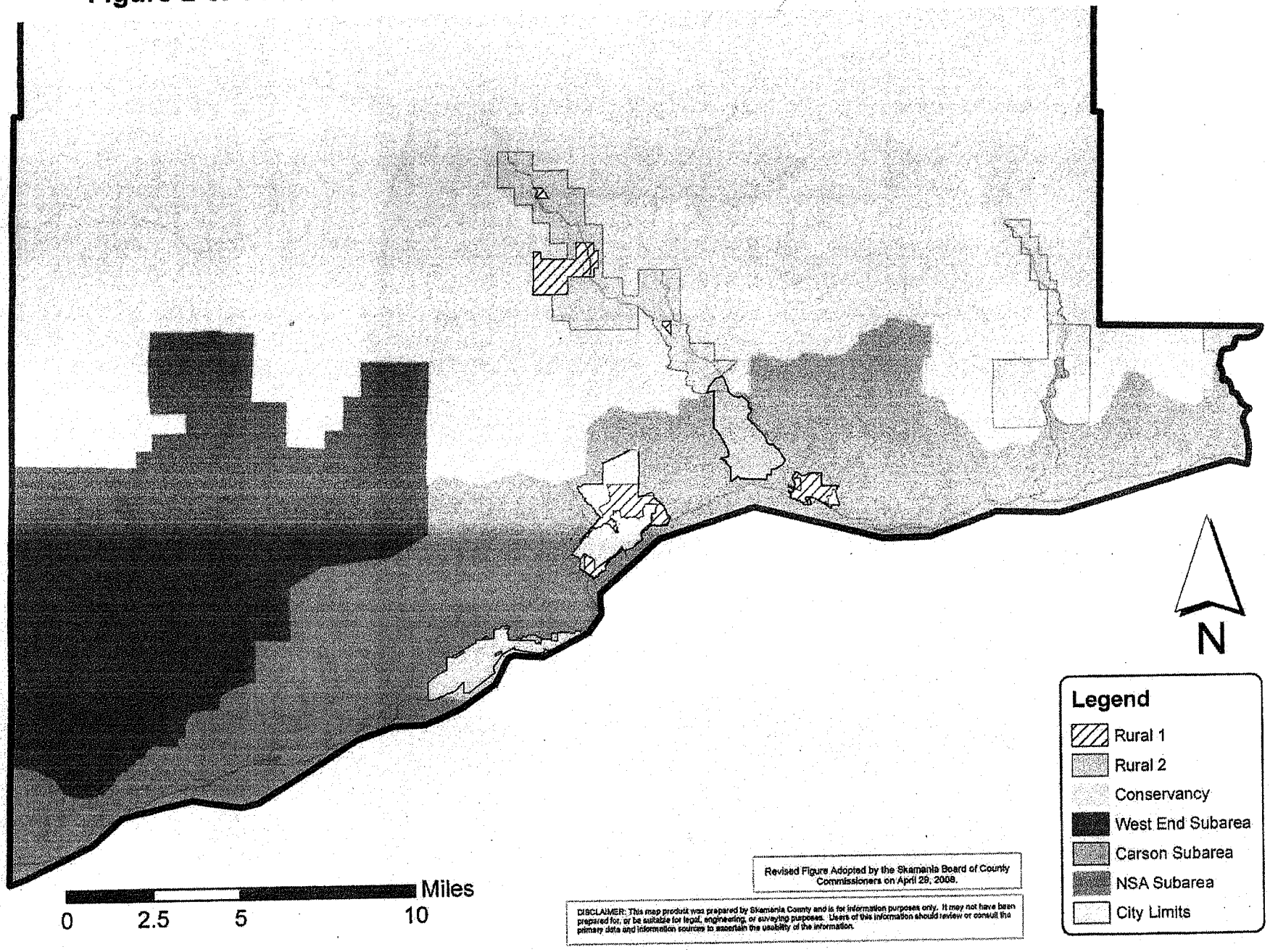


Figure 2-3. Southern Portion of 2007 Comprehensive Plan Land Use Designation Map



CHAPTER 3: ENVIRONMENTAL ELEMENT

Introduction

The quality of life in Skamania County is affected by the health of its natural environment. Air, water and land resources are essential to the very existence of human development. Skamania County's built environment directly and indirectly affects the natural environment. Therefore, land use plans and major land use decisions should be made with the fullest possible understanding of the natural environment. Although the built environment inevitably affects the natural environment, Skamania County can implement policies that allow for development while minimizing the level of direct impacts to the natural environment that are commonly associated with development activities.

The Environmental Element provides a policy framework for the protection and improvement of Skamania County's natural environment. Policies and regulations guide land development, with particular attention given to development near critical areas such as wetlands, aquifer recharge areas, fish and wildlife conservation areas, geologically hazardous areas, and floodplains. The intention of these environmental policies is to provide specific environmental goals and requirements as the basis for development regulations and general goals for land use planning. The Environmental Element addresses land development throughout the entire unincorporated area of Skamania County, and includes various environmental policies that apply to the entire county. The result should be development practices that protect rather than destroy significant natural features and processes of the land in Skamania County. The Environmental Element is one with the various aspects of other Comprehensive Plan elements; no one goal or policy is pursued to the exclusion of others. In considering protection of the natural environment against other needs, including urban growth, housing, economic development and recreational opportunities, Skamania County strives to balance these goals and achieve protection of the environment through a variety of means, including regulation of property, incentives, and public programs.

Topography and Climate of Skamania County

Rugged mountainous lands dominate the topography of Skamania County. The elevation ranges from near sea level along the Columbia River up to 8,366 feet at the summit of Mount St. Helens (post-1980 eruption) in the north. Along the Columbia River west of Stevenson, the land is formed in level benches or low terraces. To the east of Stevenson mountainous uplands extend to the river. In general, from the river, to the north, the land rises in a series of steep rocky bluffs, with level to rolling benches at the summits. From the Gifford Pinchot National Forest's southern boundary northward the topography is primitive, rugged and mountainous.

The climate of Skamania County is temperate and strongly influenced by topography. It is characterized by cool, dry summers, and mild, moist winters. Along the Columbia River annual rainfall varies in an eastwardly direction from 50 to 60 inches in the southwestern part of the county to more than 75 inches near the crest of the Cascade Mountain Range. East of this crest rainfall decreases rapidly to about 35 inches in the southeast corner of the county. Precipitation is higher and temperatures lower with increasing elevation away from the Columbia River. The mountainous valleys in the interior of the County receive annual rainfall of greater than 90 inches.

Opportunities and Constraints

The physical and biological environment of Skamania County provides both "opportunities and constraints" to the use and enjoyment of the lands and resource base. Any given area of land within the county will have physical and biological features such as slopes, soil types, hydrology, geographic structure/stability, wind and sun exposure, etc., which will influence the range of potential uses that may be successfully employed upon it.

Critical Resources and Best Available Science

The Washington State Growth Management Act (GMA) does not require an Environmental Element to be part of the Comprehensive Plan. However, GMA does require the protection of the five "critical areas", which include wetlands, aquifer recharge areas, fish and wildlife habitat conservation areas, frequently flooded areas, and geologically hazardous areas. Although Skamania County is not required to fully plan under the GMA, it is required to use Best Available Science (BAS) in developing policies and regulations and to implement critical area regulations for this element. The statutory obligation is to protect the functions and values of critical areas and to give special consideration to conservation and protection measures to preserve or enhance anadromous fisheries.

The benefits that these critical areas yield range from providing wildlife or vegetative ecosystem habitat, to limiting or mitigating human concerns such as water pollution or flood hazards. Vegetation retention is critical to protecting streams and riparian habitat necessary for sustaining healthy fish and wildlife populations. Critical areas also provide the benefits of recreation, aesthetic enjoyment and water supplies. Maintenance of tree cover, natural vegetation and wetlands are critical to the prevention of erosion, flooding, property and habitat damage, the continued functioning of the ecosystem and preservation of rural character.

Unlike residential, commercial, or industrial uses, critical areas do not typically constitute a separate zoning designation. Policies and programs used to protect and conserve these areas involve a range of federal, state, and local programs and standards. Most policies used to address critical areas are therefore regulatory or

incentive-based and are applied to privately and publicly held lands. Limitations on structural development are one way to provide critical land protection.

In June 2006 the Board of County Commissioners authorized the publication of the Critical Areas Compliance Review for Best Available Science. The Environmental Element is updated to include Best Available Science, which will support the adoption of critical areas regulations based on Best Available Science and to guide future regulation updates and project reviews as appropriate.

Wetlands

Wetlands assist in the reduction of erosion, siltation, flooding, ground and surface water pollution, and provide wildlife, plant, and fish habitats. Wetlands are characterized by the presence of water at or near the surface, which creates distinct soil types and supports a prevalence of vegetation typically adapted for life in saturated soil conditions. Each wetland provides various beneficial functions, but not all wetlands perform all function, nor do they perform all functions well. Wetlands destruction or impairment may result in increased public and private costs or property losses. Countywide mapping covering the full range of wetland classes is available through the National Wetland Inventory and hydric soil mapping.

During the June 2006 Compliance Review, the Board of County Commissioners reviewed the four alternative methods recommended by the Washington State Department of Ecology for determining wetland buffer widths. The Board authorized the use of Alternative 3 in the drafting of the Comprehensive Plan and future development regulations.

The best available science for determining wetland buffer widths is divided into Western and Eastern Washington guidance documents, providing two sub-categories to each of the four alternative buffer width systems. Skamania County is the only county in Washington State to be located in both Western and Eastern Washington. Therefore, Skamania County's wetland buffer system will also include two sub-categories (Western and Eastern Washington).

Alternative 3 provides the most flexibility in applying buffers to wetlands in both Western and Eastern Washington. When using alternative 3, a wetland may fall into more than one wetland characteristic. In that case, the required buffer to protect the wetland would be the widest one.

Critical Aquifer Recharge Areas

Residents in Skamania County rely on groundwater for the majority of their potable water resources. Groundwater is contained in underground formations called aquifers that are important public resources and fundamental components of the overall

hydrologic cycle. Aquifer recharge areas have a critical recharging effect on groundwater aquifers. Rainfall contributes to surface water and recharges the groundwater as precipitation infiltrates through the soil. Groundwater aquifers supply water to lakes, wetlands, streams, and both public and private wells. Land development can change the natural hydrologic cycle when the surface water is transformed through clearing, grading, filling, excavation, compaction and new impervious surface. These modifications decrease the land's capacity to absorb and retain rainfall and reduce the groundwater recharge potential. Aquifer recharge areas are vulnerable to contamination that would affect the potablity of the water. Once groundwater is contaminated, it is difficult, costly, and sometimes impossible to clean up.

Public water supply systems with 15 or more connections are regulated under the Federal Safe Drinking Water Act and they must inventory potential contamination sources around the wells. The Washington State Department of Health is working with the Washington State Department of Ecology to provide web-based maps of potential contamination sources along with locations of wellhead protection zones for these systems.

Accurate information on groundwater resources in Skamania County is not currently available. Absent of definitive data on groundwater resources, the Comprehensive Plan and future modifications to the Critical Area Ordinance regulations will focus the issue of aquifer protection in areas of known or suspected surface/groundwater connectivity. These areas are as follows:

- Within the river, stream and creek corridors
- In floodplains and wetlands
- In other areas of known surface hydrology based on the information gathered by the Skamania County Health Department in well logs

Source based policies are typically used to provide protection to large and less clearly defined critical areas, such as aquifer recharge areas, or to address other concerns related to ground or surface water quality. Septic system regulations are administered by the Skamania County Health Department, and are directed toward the protection of critical resources, which are not necessarily at the site of the potential pollutant source. Wellhead protection easements and/or setbacks are an acceptable way to protect critical aquifer recharge areas. Stormwater management and erosion control policies are intended to address potential adverse water quality impacts beyond the source site.

Fish and Wildlife Habitat Conservation Areas

Fish and wildlife are important historic, cultural, recreational, and economic resources. Some fish and wildlife species serve as indicators to the condition of the environment and quality of life in Skamania County. In general, fish and wildlife require habitat that provide forage, water, vegetation and areas for breeding, nesting, roosting and cover

from predators. Most of the land and water area in Skamania County provides some form of potential fish or wildlife habitat. Skamania County has several hundred miles of streams and rivers.

The federal and State governments have established systems to determine the relative importance of protecting species, as follows:

- **Endangered (federal and State category):** An endangered species is one that is in danger of extinction throughout all or a significant portion of its range.
- **Threatened (federal and State category):** A threatened species is one that is likely to become endangered in the foreseeable future.
- **Sensitive (State category):** A sensitive species is any wildlife species native to the State of Washington that is vulnerable or declining and is likely to become endangered or threatened.
- **Candidate (federal and State category):** A candidate species is one that is being assessed for whether it meets the criteria as endangered or threatened. In Washington State, these species are also reviewed for whether they are considered a sensitive species.
- **Priority (State program definitions, not in State law):** A priority habitat is a habitat type with unique or significant value to many species. Priority species are fish and wildlife species requiring protective measures and/or management guidelines to ensure their perpetuation. Priority species include State listed (endangered and threatened) and candidate species; vulnerable aggregations of animals susceptible to significant population declines; and species of recreational, commercial, and/or tribal importance that are vulnerable.

Several fish and wildlife species residing in Skamania County are listed as either endangered or threatened under the federal and/or state determinations. Those species listed as endangered under the federal Endangered Species Act (ESA) include, upper Columbia River Chinook salmon and steelhead, Snake River sockeye salmon, and the Northern spotted owl. Species listed as threatened under the ESA include several salmon runs, bull trout, and the bald eagle. In addition, Skamania County is habitat for several state listed species, including the western pond turtle, larch mountain salamander and sandhill crane. Species listed under both federal and Washington State laws change from time to time, as species recover and new ones are listed.

Skamania County provides important seasonal habitat for migrating birds, including tundra swan and Canadian geese. Annual visits by the tundra swan have made Franz Lake a habitat of particular importance to the local residents. Canadian geese are common on islands and in backwater areas of the Columbia River. Other waterfowl species use the many small lakes and ponds for nesting areas.

Skamania County provides a woodland type of wildlife habitat that is conducive to big game (deer, elk) production. The limiting factor for big game populations is the amount

of available winter range. Generally, lands below 1,500 feet in elevation are the critical winter range for deer and elk. The valleys and stream bottoms under 1,500 feet in elevation are where the heaviest concentrations of wintering animals are found. The high snowfall in Skamania County creates a difficult winter situation for big game and these valleys and stream bottoms are very important winter-feeding areas. Lands lying above 1,500 feet in elevation provide summer range for big game. In summary, wildlife management in Skamania County for all species is primarily dependent on the available winter range. Over development in these critical areas will be detrimental to wildlife, especially big game herds. Intensive development along stream and lakeshores and islands along the Columbia River will also have an adverse effect on both fish and wildlife. Land use planning and future development in the county should give consideration to the habitat requirements of wildlife in order to maintain and enhance this valuable natural resource.

Wildlife habitat is not restricted to those areas already under public ownership. However, it is inconceivable that only the private land in Skamania County (6.5% of the land area of Skamania County) should be utilized to provide protection for winter range and other habitat areas. Over 93.5% of Skamania County is held in either public ownership (Federal or State) or is located within the National Scenic Area. The Gifford Pinchot National Forest contains 855,000 acres within Skamania County (80% of the land area in Skamania County). The United States Forest Service as stewards of the Gifford Pinchot National Forest should become better caretakers of the public land by working jointly with other government agencies (Federal, State, and Local) and with private property owners to achieve healthy forests, including healthy wildlife habitat areas for winter range. Currently, the United States Forest Service has failed in its role as responsible stewards of public lands.

Riparian corridors and other areas adjacent to or including surface water bodies clearly provide the most wide ranging and significant wildlife habitat. Buffers are established to protect critical areas and natural resources from human disturbance and usually include all or a portion of the riparian area associated with that specific critical area or natural resource. Buffer areas surrounding water resources are necessary to maintain and protect Skamania County's watersheds by stabilizing soil and preventing erosion; filtering suspended solids, nutrients and harmful substance; moderating impacts of stormwater runoff; protecting wildlife habitat from adverse impacts; maintaining and enhancing habitat diversity and integrity; and reducing disturbances to resources caused by intrusion of humans and domestic animals. The width of the buffer on a stream, creek or river is determined by the stream type classification from the Washington State Department of Natural Resources (DNR). In 1996 when Skamania County's Critical Areas Code was adopted the DNR stream type classification was a five-category system (1 – 5). Recently, the DNR has converted the stream type system to a four-category system (S, F, Np, and Ns) as defined in WAC 222-16-030 and WAC 222-16-031, and are described below.

The new Type S (shoreline designation) is based on data provided by Washington State Department of Ecology (DOE). The new Type F (fish habitat) was created using field verified data collected by the Washington State Department of Fish and Wildlife (WDFW) and the tribal governments synthesized through a geographical information system (GIS) logistic regression model. The new Type Np (non-fish perennial) and Ns (non-fish seasonal) are basically the non-fish steams that either have water flowing year round or have dry periods.

Fish and wildlife inventories have been prepared by the Washington State Department of Fish and Wildlife. However, due to the sensitivity of wildlife habitat and the volatility of issues surrounding listed endangered and threatened species laws, those inventories are not available for public inspection, but are available for the Planning Department to consult during the development reviews.

Frequently Flooded Areas

Flood hazard areas are those areas that are at risk of being inundated by a 100-year flood or, more specifically, subject to a one percent or greater chance of flooding in any given year. These areas include, but are not limited to streams, rivers, creeks, lakes, and wetlands. Floods adjacent to these bodies of water can cause great damage to human life, as well as to private and public property. In order to minimize and prevent these adverse impacts from occurring, it is imperative that appropriate regulations are established.

Skamania County currently reviews all proposed development to determine whether it would occur within the 100-year floodplain of any river or stream. The review is based on the Flood Insurance Rate Maps (FIRM) created by the Federal Emergency Management Agency (FEMA). Title 15 of the Skamania County Code establishes the requirements for any structures located within the 100-year floodplain that are consistent with the International Building Code and meets the requirements of best available science. A licensed land surveyor completes a Flood Elevation Certificate; these forms serve as a site-specific inventory to determine whether a proposed structure is elevated to an appropriate level above the floodplain.

Geologically Hazardous Areas

Geologic processes that created spectacular resources, such as Mount Saint Helens, Mount Adams, the Columbia River Gorge and the Cascade Mountain Range, sculpted Skamania County. The wealth of geologic resources also makes Skamania County one of the most geologically hazardous counties in Washington State. Geologically hazardous areas include areas susceptible to erosion, sliding, earthquake, or other geological events. They pose a threat to the health and safety of citizens when incompatible commercial, residential, recreational, or industrial development is sited in areas of significant hazard.

The Washington State Growth Management Act (GMA) further defines geologically hazardous areas as erosion hazard areas, landslide hazard areas, seismic hazard areas, volcanic hazard areas, and mine hazard areas. See Figure 3-1 and Figure 3-2 for Volcanic Hazard Area Maps. An important point to note is that geologically catastrophic events can be very difficult to predict, so it is virtually impossible to absolutely prevent losses. Land use planning and development in these geologically hazardous areas should be conditioned to minimize and mitigate hazards.

The Washington State Department of Natural Resources (DNR) has mapped areas with steep and unstable slopes, which are potential landslide hazard areas, and areas with potential for earthquakes.

Environmental Stewardship

Environmental Stewardship is a comprehensive and continuous community endeavor. Over the past ten years (1996-2006) Skamania County has implemented the critical areas code for development reviews. Repeatedly over that time frame, other state and federal agencies have recommended that the county adopt stormwater regulations and clearing/grading regulations to provide better environmental stewardship. In May 2005, the Washington State Department of Community, Trade and Economic Development (CTED) published a document titled *Technical Guidance Document – For Clearing and Grading in Western Washington* that provides the best management practices (BMPs) for land clearing and grading in Western Washington as well as techniques to integrate requirements for stormwater management and low impact development into local ordinances. However, nothing in that document is intended to supercede or amend the Washington State Department of Ecology's 2005 Stormwater Management Manual for Western Washington (SWMM), or the latest edition of the manual.

Both the Clearing and Grading document and the Stormwater Management Manual (SWMM) should be considered as guiding documents for the County's stormwater regulations and the clearing and grading regulations.

Skamania County has an abundance of streams, and development influences the biological health of these streams. The SWMM describes the effects development has on water bodies. It states that before forests were cleared for farms and towns, rainfall was largely absorbed into the ground, later replenishing streams as springs and seeps. As settlement occurs, trees are removed and replaced by fields, buildings and roads. Instead of soaking into the ground and returning to streams slowly, rainwater runs off rapidly and greatly increases stream channel erosion and degrades stream habitat. During summer months, stream flow may be reduced to low levels because less water is available to springs and seeps that feed the streams. The SWMM also states that along with changing stream flows, development has the potential to add various pollutants to surface water and groundwater.

Some methods to mitigate increased stormwater runoff are engineered stormwater controls such as retention/detention ponds that slowly meter out stormwater runoff at pre-development levels and grassy swales used to trap pollutants. Other methods include retaining more vegetation and soil on site (less land clearing) during land development. Low impact development (LID) is an innovative development strategy that minimizes or precludes adverse impacts on the natural environment. By mimicking natural systems, low impact development can help maintain or restore the natural hydrology. LID techniques applicable to new development or redevelopment include preserving native vegetation, natural drainages and porous soils; reducing impervious surfaces; diverting runoff from storm drainage systems; and limiting total impervious surfaces on a site and clustering development. Skamania County encourages all residents and businesses to explore ways to contribute to protecting the environment. One option to protect the environment may be to develop a Stormwater Utility District in areas of Skamania County that have greater potential concerns.

Environmental Element Goals and Policies

Preservation and protection of the natural environment is an essential piece of Skamania County's livability. By integrating the natural and built environment, Skamania County will preserve and enhance a high quality of life for its residents with clean water, habitat for fish and wildlife, and safe and secure places for people to live and work. Skamania County is committed to protecting and enhancing the natural environment at the same time that it meets its other land use, economic development, housing, and infrastructure goals.

The following goals and policies reflect the county's interest in protecting the environmental quality of life in the county. Many, if not most, of the goals and policies stem from and are intended to complement federal and state mandates. The updated critical areas development regulations will be derived from the goals and policies listed below:

Goal E.1: To ensure the proper management of the natural environment to protect critical areas and conserve land, air, water, and energy resources.

Policy E.1.1: Define critical areas consistent with RCW 36.70A.030 or as amended.

Policy E.1.2: Modify critical area management practices and regulations over time to address changing conditions and best available scientific information gained from monitoring activities and research.

Policy E.1.3: Limit development and activities in critical areas that would damage their functions, except to the minimum extent necessary when there is no reasonable alternative and subject to Best Management Practices.

Policy E.1.4: Implement and preserve critical area buffers based on best available science adjacent to critical areas to adequately protect such areas from development and land use impacts.

Policy E.1.5: Prepare clearing and grading regulations to help prevent unnecessary stripping of vegetation and loss of soils.

Policy E.1.6: Prepare stormwater management regulations to help prevent stream channel erosion and degraded stream habitat, and to promote healthy stream recharge that are substantially equivalent to those in the Washington Department of Ecology Stormwater Management Manual.

Policy E.1.7: Maintain clear development review standards for the control of the quantity and quality of stormwater discharge from development projects.

Policy E.1.8: Regulate development activities to avoid clearing of vegetation that maintains slope stability, reduces erosion, shades shorelines, buffers wetlands and stream corridors, and provides wildlife and aquatic habitat.

Policy E.1.9: Encourage the use of northwest native plants in landscaping, particularly adjacent to critical areas.

Policy E.1.10: Ensure prompt restoration of land after grading and vegetation removal through phased clearing and grading, replanting requirements, and other appropriate revegetation and engineering techniques.

Goal E.2: To enhance water quality; protect environmentally sensitive areas including wetlands, streams, rivers, lakes, riparian areas, and aquifer recharge areas; and manage floodplains.

Policy E.2.1: Allow enhancement or restoration of degraded wetlands and riparian corridors to maintain or improve ecological functions. Approve wetland mitigation proposals if they will result in improved overall wetland functions. Preserve land used for wetland mitigation in perpetuity.

Policy E.2.2: Review the effects of development proposals on all fish species, which include anadromous fish and other species protected under the federal Endangered Species Act and require mitigation such as riparian habitat enhancement and water quality treatment.

Policy E.2.3: Actively monitor the Lower Columbia Fish Recovery Board activities in Water Resource Inventory Areas (WRIAs) 25, 26, 27 and 28, which focuses on the long-term strategic watershed planning, management, conservation and restoration, and addresses water quality, water quantity, and fish habitat.

Policy E.2.4: Actively participate as lead agency in WRIA 29, which focuses on the long-term strategic watershed planning, management, conservation and restoration, and addresses water quality, water quantity, and fish habitat. However, currently only the Western portion of WRIA 29 is actively involved in the planning process.

Policy E.2.5: Promote low-impact design development that allows for infiltration and recharge of stormwater runoff, where appropriate, based on the

applicant supplying documentation from a licensed Washington State Professional Engineer.

Policy E.2.6: Regulate development within the 100-year floodplain to avoid substantial risk and damage to public and private property and loss of life. These regulations shall at a minimum comply with State and FEMA requirements for flood hazard areas.

Goal E.3: To minimize the loss of life and property from landslides, seismic, volcanic, or other naturally occurring events, and minimize or eliminate land use impacts on geologically hazardous areas.

Policy E.3.1: Regulate uses and activities that occur within or near geologically hazardous areas in a manner that minimizes the potential for property damage and loss of life.

Policy E.3.2: Restrict development on potentially unstable land to ensure public safety and conformity with natural constraints.

Policy E.3.3: Apply the International Building Codes, as amended by the State of Washington, and any other necessary special building design and construction measures to minimize the risk of structural damage, fire, and injury to occupants due to geological hazards.

Policy E.3.4: Require geotechnical studies to determine construction methods and technologies necessary to further public safety in geologically hazardous areas. The development design and construction technology used shall be appropriate to the soil limitations of the particular site.

Policy E.3.5: No development should occur on any known fault lines, which have the potential to cause severe damage to human lives.

Policy E.3.6: Any new development proposals in high-risk volcanic hazard areas should be subject to mitigation measures. At a minimum, the mitigation measures should include notifying future residents that they are living in an area deemed volcanically hazardous and signage should be installed at each entrance into the Swift Reservoir Area stating "Entering Active Volcanic Hazard Area".

Goal E.4: To consider the requirements of the human population while protecting fish and wildlife habitats, including salmonid habitat, by preserving, restoring, and enhancing critical areas; and linking habitat for wildlife and native ecosystems.

Policy E.4.1: Manage fish and wildlife habitat conservation areas to protect overall habitat functions and values (e.g., food, water, cover, space). Rely on State identified wildlife habitat areas and sites as designated on the Priority Habitat Maps. However, unmapped wildlife habitat areas and sites may be identified during the development review process.

Policy E.4.2: Develop strategies for preserving, protecting or restoring important habitats and corridors, particularly if they are at risk of significant degradation. Some strategies may include public acquisition of habitat; linking habitats using open space areas, riparian corridors, and other natural features; encouraging the use of conservation easements for long-term habitat protection; promoting land use plans and development that avoid impacts on habitat; and protecting native plant communities by encouraging management and control of non-native invasive plants, including aquatic plants.

Policy E.4.3: Encourage consistency among Skamania County and its cities regarding methods of critical area definition, mapping, mitigation strategies, and policy treatment.

Policy E.4.4: Coordinate with other jurisdictions and agencies to protect environmentally critical habitats, particularly ecosystems and watersheds that span jurisdictional boundaries.

Policy E.4.5: In cooperation with Washington State Department of Fish and Wildlife (WDFW) establish appropriate avoidance, minimization, and mitigation measures for development projects that have a probable impact on listed species and their habitat.

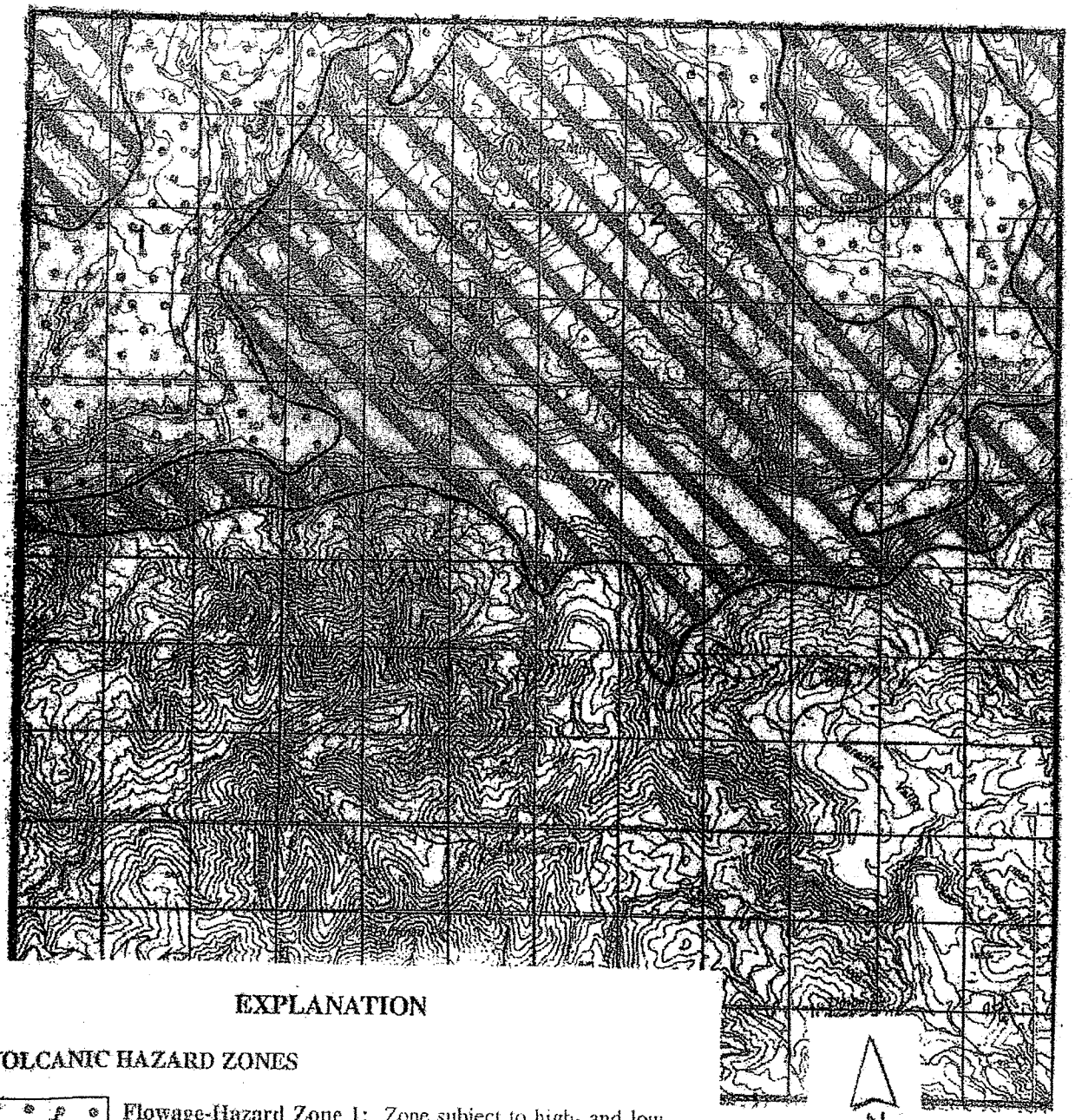
Policy E.4.6: Encourage All Terrain Vehicle (ATV) use and motorized Off Road Vehicle (ORV) use to be located in appropriate areas of private land outside of critical resource areas.

Goal E.5: Plan and coordinate land uses, public access, and natural resource protection along shorelines of the State in accordance with the State Shoreline Management Act and the Skamania County Vision.

Policy E.5.1: Continue to implement the adopted Shoreline Master Program for Skamania County until such time as it is amended or replaced to meet the State deadline of December 1, 2012.

Policy E.5.2: Solicit review assistance from the Washington State Department of Ecology (DOE) beginning in 2008 for the compliance review portion of the Shoreline Master Program Update.

Figure 3-1: Mt. St Helens Volcanic Hazard Zone



EXPLANATION

VOLCANIC HAZARD ZONES

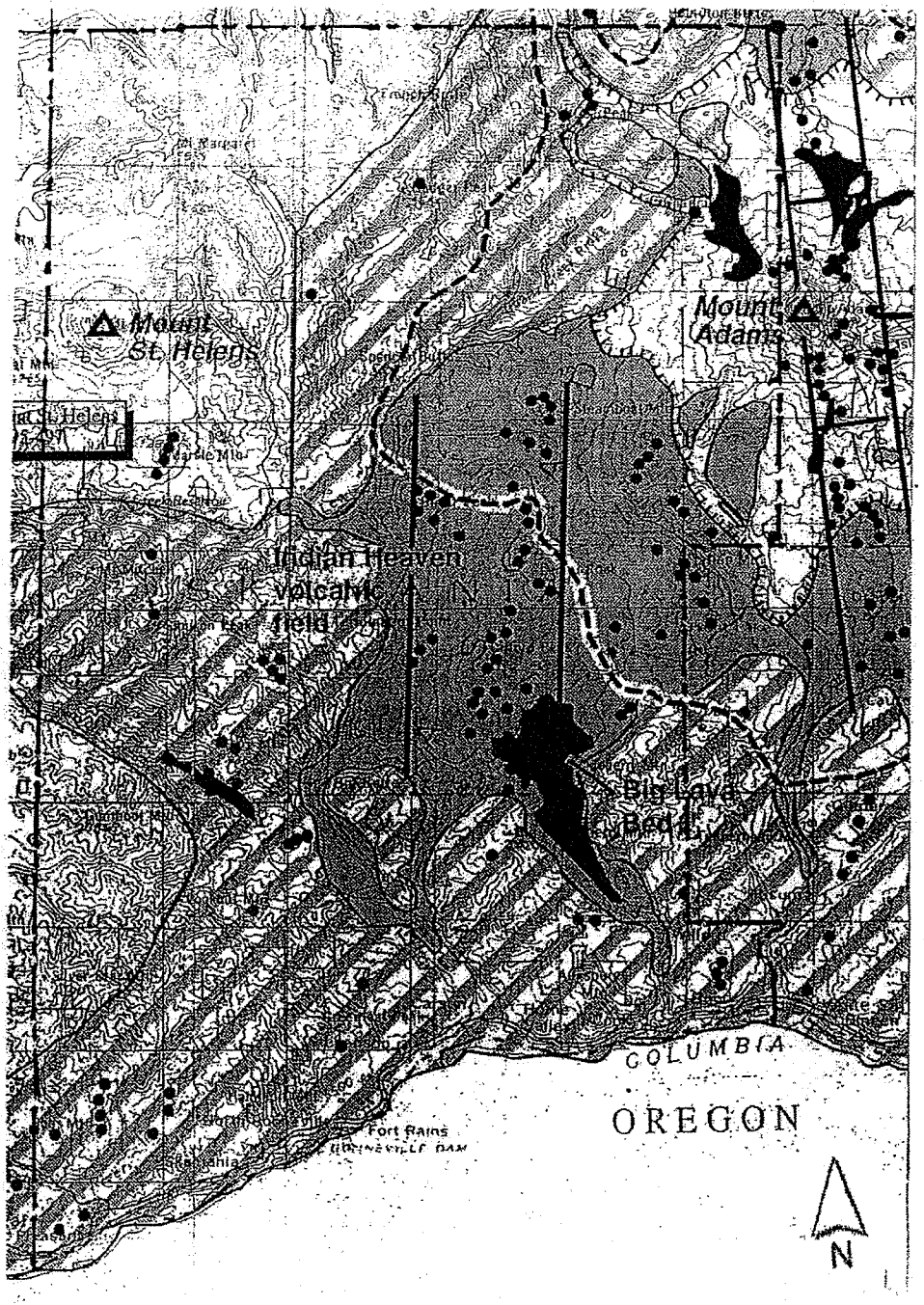
Flowage-Hazard Zone 1: Zone subject to high- and low-density flows (pyroclastic flows and surges, lava flows, and proximal lahars)

Flowage-Hazard Zone 2: Zone subject to low-density flows (pyroclastic surges, including ash clouds)

N

= 1 MILE

Figure 3-2: Mt. Adams Volcanic Hazard Zones



Explanation
Volcanic Hazard Zones

Hazard zone LA

Hazard zone LB

Hazard zone LC

= 1 Mile

= County Line

CHAPTER 4: TRANSPORTATION ELEMENT

Introduction

Skamania County is primarily a rural community and is often very different from urban expectations. County governments are not always able to provide the same level of service in undeveloped, rural and remote areas as they do inside urban or developed areas. Residents will encounter differences in terms of roads and utilities, as well as government positions concerning the right to farm, wild animals, weather conditions and more. Emergency response times for sheriff, fire suppression, medical, and other services cannot be guaranteed in rural areas. In extreme weather situations, County maintained roads might become impassable. Extreme weather conditions can also damage both public and private roads. It is important to remember that gravel roads generate dust.

A safe and efficient transportation system for the movement of people, utilities and goods is needed to support existing and future development. The purpose of this plan element is to identify the types, location and extent of existing and proposed transportation facilities and services. These important linkages are vital to the economic health and viability of Skamania County and they need to be maintained and enhanced in order to efficiently provide their service.

This transportation element has been developed to address transportation needs in Skamania County. Skamania County transportation system consists of 255 total miles of roads and 29 bridges with an estimated value of over $500 million. It represents the county's policy plan for the next 20 years and specifically considers the location and condition of the existing traffic circulation system, the projected transportation needs, and plans for addressing future transportation needs while maintaining established level of service standards.

The Skamania County Regional Transportation Plan (SCRTP) dated February 2006, is incorporated into this plan by reference. The Regional Transportation Council consisting of WSDOT, County and City representatives developed the SCRTP. This plan identifies future regional transportation system needs and outlines the transportation plans and improvements necessary to maintain adequate mobility within and throughout the Skamania County region.

The Skamania County Public Works Department will continue to be progressive in providing the County with a safe and efficient road transportation system that meets the transportation needs of Skamania County. The six (6) year plan lists the road projects that have been identified as necessary to meet the future population growth of the County. Coordination with Cities, State and Federal agencies will continue and will include overall regional improvements as a priority.

Existing Transportation System

County Roads

Table 4-1 Lists the County Roads and Functional Classification. The area served by the County arterials and collectors are shown on Figure 4-1 (7 pages), the County Road Map.

Table 4-1 Skamania County Roads

Federal Function Class	Road Area (*)	Road Number	Road Name	Length
07	1000	91140	Canyon Creek Road	4.24
07	1000	11060	Washougal River Road	1.00
07	2000	92135	Wind River Road	28.15
07	3000	93041	Cook-Underwood Road	14.35
08	1000	10040	Belle Center Road	3.41
08	1000	11030	Mt. Pleasant Road	2.03
08	1000	12130	Salmon Falls Road	3.43
08	1000	11080	Skye Road	3.73
08	1000	11060	Washougal River Road	7.45
08	2000	20040	Curly Creek Road	5.07
08	2000	20340	Hot Springs Avenue	1.48
08	2000	20620	Kanaka Creek Road	2.00
08	2000	20280	Loop Road	6.85
08	2000	20540	Smith-Beckon Road	1.07
08	2000	92135	Wind River Road	2.09
09	1000	Varies	34 Roads	51.95
09	2000	Varies	120 Roads	55.38
09	3000	Varies	66 Roads	54.23
Total	All	All	All Roads	255.32

***District 1 Roads = Area 1000**
***District 2 Roads = Area 2000**
***District 3 Roads = Area 3000**

Note: Roads are subject to reclassification pursuant to a recommendation from the Public Works Department and action taken by the Skamania County Board of County Commissioners

Skamania County Bridges

Skamania County manages, inspects and maintains 29 County bridges and 8 City bridges within Skamania County. Bridge capacity and volume requirements will not be exceeded with future development over the next 20 years. Although, Skamania County Public Works Department will continue to increase safety of all bridges for the traveling public.

Federal Law requires that qualified personnel inspect all public bridges during prescribed intervals. Skamania County has maintained these qualifications and plans to continue its future bridge inspections. Two (2) bridges are classified as Functional Obsolete and one (1) bridge is Structurally Deficient, three (3) are Fractural Critical, and five (5) are Scour Critical. All County bridge deficiencies will be corrected in the future depending on funding.

State Highways

The Washington State Department of Transportation (WSDOT) is responsible for maintenance of the state highways through Skamania County:

- **State Route 14 (SR 14)** – Primary Arterial that provides primary access through the County, traversing along the southern boundary along the northern edge of the Columbia River from the west border to the east border.

United States Forest Service (USFS) Roadways

Within Skamania County, the Gifford Pinchot National Forest operates and maintains approximately 2,253 miles of roadway, of that 1,910 miles are open to the public, and 1,475 miles of trail. The majority of these road miles serve internal access to the Forest. Forest Road 23 provides access through the forest from Trout Lake to Randle. Forest Roads 25 and 90, in conjunction with Skamania County Wind River Road and Curly Creek Road, provide a through route from Carson to Randle. Forest Road 90, from Pine Creek to the western Forest Boundary (near Woodland) receives the highest traffic volumes of any of the Forest roads and provides access to large tracts of private timberlands and recreational development. Cars, trucks, motorcycles, horses, bicycles, wheelchairs, pedestrians and other modes of transportation traverse these roads and trails for recreation, resource management projects and private property use. Historically, much of the road system on the Gifford Pinchot National Forest was developed to gain access to timberlands. These access points have been maintained largely at the expense of the United State Forest Service.

The Unites States Forest Service operating budgets and ability to maintain all of the existing road system have been significantly reduced. Therefore, some roads may be removed from the system, others closed until further access is needed, and many

others kept at the lowest possible maintenance levels for budget and resource protection reasons.

Skamania County has an Inter-Agency Agreement with the USFS for maintenance of the USFS 90 Road from the Cowlitz County Line to the intersection of Skamania County Curly Creek Road and the USFS 25 Road from Mile Post (MP) 44.0 to the USFS 90 Road intersection. Currently, winter maintenance is contracted with other road maintenance activities in conjunction with the USFS.

Functional Classifications

With the exception of state highways, forest roads, private roads and city streets within the incorporated cities of Stevenson and North Bonneville; all other roads are maintained by Skamania County. The Public Works Department manages Skamania County road system. Roads are generally defined by functional classification within a transportation system. A transportation system is comprised of primary arterials, arterial, collectors and local access roads, which are defined below:

- **Primary Arterials:** Provide for traffic movement between communities, areas in the community, and major traffic generators. They also provide a link between long haul freeways and the highest type facility that can be justified by traffic movement, regulation of parking, access control, restriction of turning movements and automatic control devices are required. Responsibility for construction, maintenance and operation can be Federal, State and County or municipal. Design of primary arterials should provide for two to four moving traffic lands within minimum rights-of-way of 100 feet. Lane width should be a minimum of 11 feet with median separation and turn bays in areas of high turning movements. Design speeds range from 35 mph in urban areas to 55 mph in rural areas. State Highway 14 is the only primary arterial in the County.
- **Rural Major Collectors (Arterial Roads) – Federal Function Class 07:** Provide for traffic movement between communities, areas in the community, and major traffic generators. Rural Major Collectors form the transition from the minimum access of the primary arterial to the almost complete access points into abutting property, and their main function is to provide frequent contact with numerous Rural Minor Collectors. The limited number of intersections with primary arterials permitted by the use of arterials provides a convenient distribution system into the collector and local access roadways. The design of minor arterials should provide for two 12-foot traffic lanes with design speeds of 35 mph in urban areas to 55 mph in rural areas. The minimum rights-of-way should be 60 feet on all new construction.
- **Rural Minor Collectors (Collector Roads) – Federal Function Class 08:** The collector road is basically a local road where traffic service is given slightly greater emphasis. As its name implies, this type of road collects traffic from residential roads and carries it to the arterial system. Responsibility for construction, maintenance and operation is by the County. The design of

collectors should provide for two 11-foot travel lanes (minimum) within a right-of-way of 60 feet (minimum for new construction).

- **Local Access (Access Roads) – Federal Function Class 09:** Streets not selected for inclusion in the arterial or collector classes are designated local access. They allow access to individual homes, shops, and similar traffic destinations. Direct access to abutting land is essential, for all traffic originates from or is destined to abutting land. In residential areas, the road should be designed to add aesthetic qualities to the area and to discourage through traffic. Responsibility for construction, maintenance and operation is by the County. A minimum of two travel lanes should be provided on a minimum right-of-way of 60 feet. Travel lane should be a minimum of 10 feet in width. Private roads are not included.

Traffic Volume and Characteristics

Traffic volumes provide a measure of traffic use and potential traffic congestion, and are typically expressed in terms of Average Daily Traffic (ADT). Volume data was gathered from WSDOT and Skamania County. Skamania County Public Works Department administers and maintains approximately 255 miles of road (29 miles of gravel and 226 miles of paved) within the County.

Washington State Department of Transportation (WSDOT) gathered Traffic Count Data on SR-14 in June 2004. The counts included Average Weekday Traffic Counts with a Truck Percentage taken from the County boundary on the west end to Cook-Underwood Road and the County boundary on the east end. The average weekday traffic volume on SR-14 is highest between the Bridge of the Gods and Wind River Road, with the peak traffic volume occurring within the City of Stevenson, including 25.5% truck traffic.

Level Of Service

Level of Service (LOS) is a measure of the ability of a facility to perform its intended function. LOS for transportation facilities is defined most often by the capacity of the facilities. The Transportation Research Board's *Highway Capacity Manual* defines LOS ratings "A" through "F" for highway segments, intersections, or arterial street segments based on the volume of traffic compared to the available capacity of the facility, with "E" representing a facility operating at capacity. A level of service definition considers factors such as speed and travel time, traffic volume, freedom to maneuver, traffic interruptions, comfort, convenience and safety. The following level of service (LOS) definitions may be used to describe transportation during uninterrupted flow conditions:

- LOS A: Describes free flow conditions, with low volumes and high speeds. Freedom to select desired speeds and to maneuver with the traffic systems is

extremely high. The general level of comfort and convenience provided to the motorist, passenger or pedestrian is excellent.

- LOS B: Is in the range of stable flow but the presence of other users in the traffic stream begins to be noticeable. Freedom to select desired speeds is relatively unaffected, but there is a slight decline in the freedom to maneuver with the traffic stream from LOS A.

- LOS C: Still in the range of stable flow, but marks the beginning of the range of flow in which the operation of individual users becomes significantly affected by interactions with others in the traffic stream. The selection of speed is now affected by the presence of others, and maneuvering within the traffic stream requires substantial vigilance on the part of the user. The general level of comfort and convenience declines noticeably at this level.

- LOS D: Represents high-density, but stable flow. Speed and freedom to maneuver are severely restricted, and the driver or pedestrian experiences a generally poor level of comfort and convenience. Small increases in traffic flow will generally cause operational problems at this level.

- LOS E: Represents operating conditions at or near the capacity level. All speeds are reduced to a low, but relatively uniform value. Freedom to maneuver within the traffic stream is extremely difficult, and it is generally accomplished by forcing a vehicle or pedestrian to "give way" to accommodate such maneuvers. Comfort and convenience levels are extremely poor, and driver or pedestrian frustration is generally high. Operations at this level are usually unstable, because small increases in flow or minor perturbations within the traffic stream will cause breakdowns.

- LOS F: Describes forced or breakdown flow. These conditions usually result from queues of vehicles backing up from a restriction downstream. Operations within the queue are characterized by stop-and-go waves, and they are extremely unstable. It marks the point where arrival flow exceeds discharge flow.

The process for establishing level of service standards requires the county to make quality of service decisions explicit. New developments should be prohibited unless warranted transportation improvements to accommodate the impacts of development or funding strategies for such improvements are made concurrent with the development or will be financially planned to be in place within six years.

For Reference, the Southwest Regional Transportation Council assessed the stretch of SR-14 located south along the Columbia River as having a level of service (LOS) C. Washougal River Road has a level of service (LOS) B.

Traffic counts are continuously being updated and analyzed in the County Transportation System. The traffic study monitors volume at several major intersections, distinguishing between passenger vehicles and heavy load transports. Vehicular traffic will increase proportionally to development.

Levels of service for non-signalized intersections are based on a volume to capacity ratio and the resultant periods of delay. Projections take into account land uses in the area surrounding an intersection and how that traffic may affect the level of service of the intersection in the future. Levels of service in non-signalized intersections in the County are expressed in terms of the average total delay per vehicle in seconds as show below in Table 4-2.

Table 4-2 Level of Service Definitions for Non-Signalized Intersections

LEVEL OF SERVICE	AVERAGE TOTAL DELAY
A	< 5 Seconds
B	> 5 and < 10 Seconds
C	> 10 and < 20 Seconds
D	> 20 and < 30 Seconds
E	> 30 and < 45 Seconds
F	> 45 Seconds

Currently, non-signalized intersections in the County are characterized by levels of service A and B, and to a lesser degree, C.

Future Road Plan

The present county road system is adequate to serve the immediate and future development within the county. It is doubtful if any new arterials or collectors will be constructed. The primary need in the county is to upgrade present roads, such as improved vertical and horizontal alignment. These improvements are presently prioritized and updated annually within the six-year county road plan.

Future considerations regarding the maintenance and expansion of the road system within the county are numerous. They range from the relatively immediate need to accomplish the projects outlined in the County's Six-Year Road Program, to the need for consistent application of transportation policy, to addressing specific needs which can be seen emerging or have been identified by public participation programs. Increased road and bridge safety will be the priority for the next 20 years.

The Washington State Department of Transportation has long-range plans for improving SR-14 from Marble Mountain Road to Canyon Creek Road in the Westend of Skamania County. These plans include major construction and realignment along the highway as well as adding a left-turn lane and accelerator lane to address intersection safety.

The Washington Department of Ecology Stormwater Management Manual for Western Washington (August 2005) combined with the WSDOT Highway Runoff Manual will provide a basis for future road design. Skamania County will continue to work with the Department of Ecology to improve stormwater runoff from all County transportation facilities.

Six Year Road and Long-term Road Plan

Skamania County transportation improvements have been identified in the Skamania County Six (6) Year Road Program. Projects are selected based on a priority matrix system, which takes into account such factors as accident history, safety, traffic volume, roadway condition, local importance and availability of funding. The Skamania County Six (6) Year Road Program is updated annually and the Long-term Road plan every 5 years.

Skamania County allocates annually a portion of the budget for an ongoing traffic safety improvement program. The safety improvement program utilizes road geometry, and traffic and accident data to identify roadway sections that may benefit from safety improvements. These identified roadway segments are prioritized to provide maximum safety value for the dollars budgeted. The safety improvements accomplished by this program are typically low cost improvements such as guardrail, road signs and roadside delineation.

Road Financing Plan

General road construction and repair funding is generated from a number of sources. Traditionally, operating funds for the six-year and annual construction transportation program have come from:

- Federal Forest Funds
- State Forest Funds
- Gas Tax
- Property Taxes – Road Levy
- Surface Transportation Program (ISTEA)
- County Arterial Preservation Program
- Rural Arterial Program

In recent years, declining timber receipts have resulted in fewer transportation dollars for Skamania County. Alternative sources of funding will be needed to recover lost revenue and maintain current levels of service.

Grant Funded Programs

In the past, the Skamania County Public Works Department has acquired over $12 million in statewide competitive grants for road, bridge, and guardrail improvements. These grants generally require a 10% local match, so for every local tax dollar spent on grant funded programs, the County receives an additional nine dollars. Many projects across the County would not have been possible without the Public Works Department's aggressive initiative in obtaining grant funding. The County Public Works Department will continue applying for more State and Federal grants to stretch transportation tax dollars even further.

Adjoining County Agencies

Clark, Klickitat, Cowlitz, Lewis and Yakima Counties surround Skamania County. Skamania County has Inter-Agency Agreements with Clark and Klickitat Counties for road maintenance and emergency activities. These agreements and communication with all adjoining Counties is vital to the long-term transportation system planning. Annual meetings determine interconnection projects and priorities to be included in future planning. Continuous sharing of resources, labor, and skills will improve the regional transportation system.

Skamania County also maintains agreements with WSDOT and the Oregon Department of Transportation (ODOT). It is critical to stay involved in the issues of the Columbia River Gorge Transportation agencies and communication linkages with these agencies should be improved.

Strategic Planning for Roads

Employees at the County Public Works Department have analyzed maintenance, improvement scheduling and practices to get the job done right within the most cost efficient way possible. Examples of this process include county engineering and design expertise used on projects and optimization of maintenance methods and materials. The staff is composed of dedicated, highly qualified professionals with unparalleled experience. There is an excellent match among employees, equipment and maintenance responsibilities.

Given the current revenue, the Pubic Works Department is able to provide the level of service described above. However, if the level of funding from Federal Forest Fund sources decline, a lower level of service should be expected.

The Public Works Department supports community involvement in the transportation planning process and will strive to hold annual public meetings on the various transportation projects.

Existing Utility Facilities

Bonneville Power Administration (BPA) has several main trunk lines crossing the southern portion of Skamania County. Additionally, the Northwest Natural Gas Pipeline crosses the southern portion of the County. The Skamania County Public Utility District (PUD) is the sole provider of electrical service in the County. The PUD currently purchases its entire power supply from the BPA. The Swift Reservoir Area is the only portion of the County that currently has no electrical service area, public water or sewer, or phone services available to the seasonal users.

Existing Terminal Facilities

The Port Terminal Facilities are located in Camas/Washougal, North Bonneville and Stevenson; and the Airport Terminal Facilities are located in Portland, Oregon.

Existing Public Transportation and Park & Ride Facilities

The Skamania County Senior Services Department offers daily public transportation between Carson and Fisher's Landing Transit Center in Clark County. The public transit makes three round trips per day and is open to the general public for a fee. The transit makes stops along its route at designated stops and deviates off route up to ¾ of a mile to meet the needs of those with disabilities. Future plans include providing service to the Eastend of Skamania County by expanding service from Carson to Hood River, Oregon. The Public Works Department is currently working on the design and permitting for an expansion to the Park & Ride facility located at Salmon Falls Road and SR14 in the Westend of Skamania County. The County should continue to improve and expand the Public Transportation System over the next 20 years.

Senior Services also provides transportation to Skamania County residents of all ages to medical and social service appointments as well as financial, social, shopping services and transportation to senior meal services.

Transportation Element Goals and Policies

Goal T.1: Transportation – Encourage an efficient multi-modal transportation network that is based on regional priorities and coordinated with county and city comprehensive plans.

Policy T.1.1: The Public Works Department (Public Works) should strive to provide a safe, convenient and cost effective roadway network with adequate capacity to meet the demand for travel in the County at acceptable levels of service.

Policy T.1.2: Public Works should continue to investigate and pursue alternative sources of grant funding for transportation related construction, maintenance and walking/bike pathways within ½ mile of Skamania County Schools.

Policy T.1.3: Public Works should continue to take periodic traffic counts and make road improvements as necessary and feasible to maintain levels of service at "C" or above throughout the horizon of this plan. If the level of service falls below a level "C", then that road should be included in the six-year road plan during the next annual review cycle for road improvements.

Policy T.1.4: Continue similar level of road maintenance to protect the current transportation investment.

Goal T.2: Continue the priority of increasing safety of the Skamania County rural 2-lane road system. The majority of the Public Works Department's future efforts will be to reduce the accident rate with Skamania County.

Policy T.2.1: Public works will continue to upgrade all arterial and collector roads to current WSDOT safety design standards.

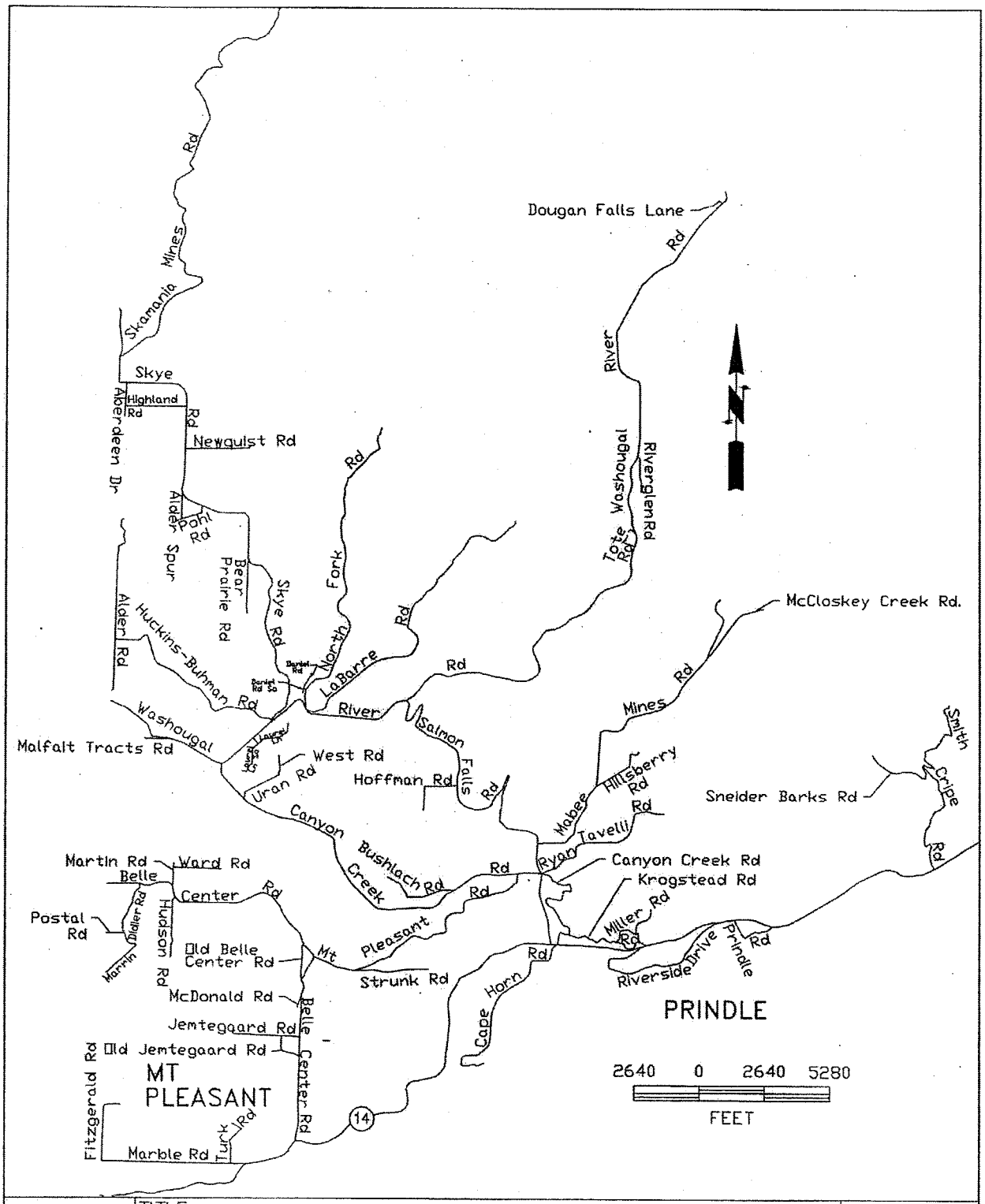
Policy T.2.2: Public Works will continue to analysis accident data in conjunction with long-term planning to improve high accident rate locations throughout the County.

Policy T.2.3: Public Works should ensure adequate lighting for all major public intersections in the Skamania County.

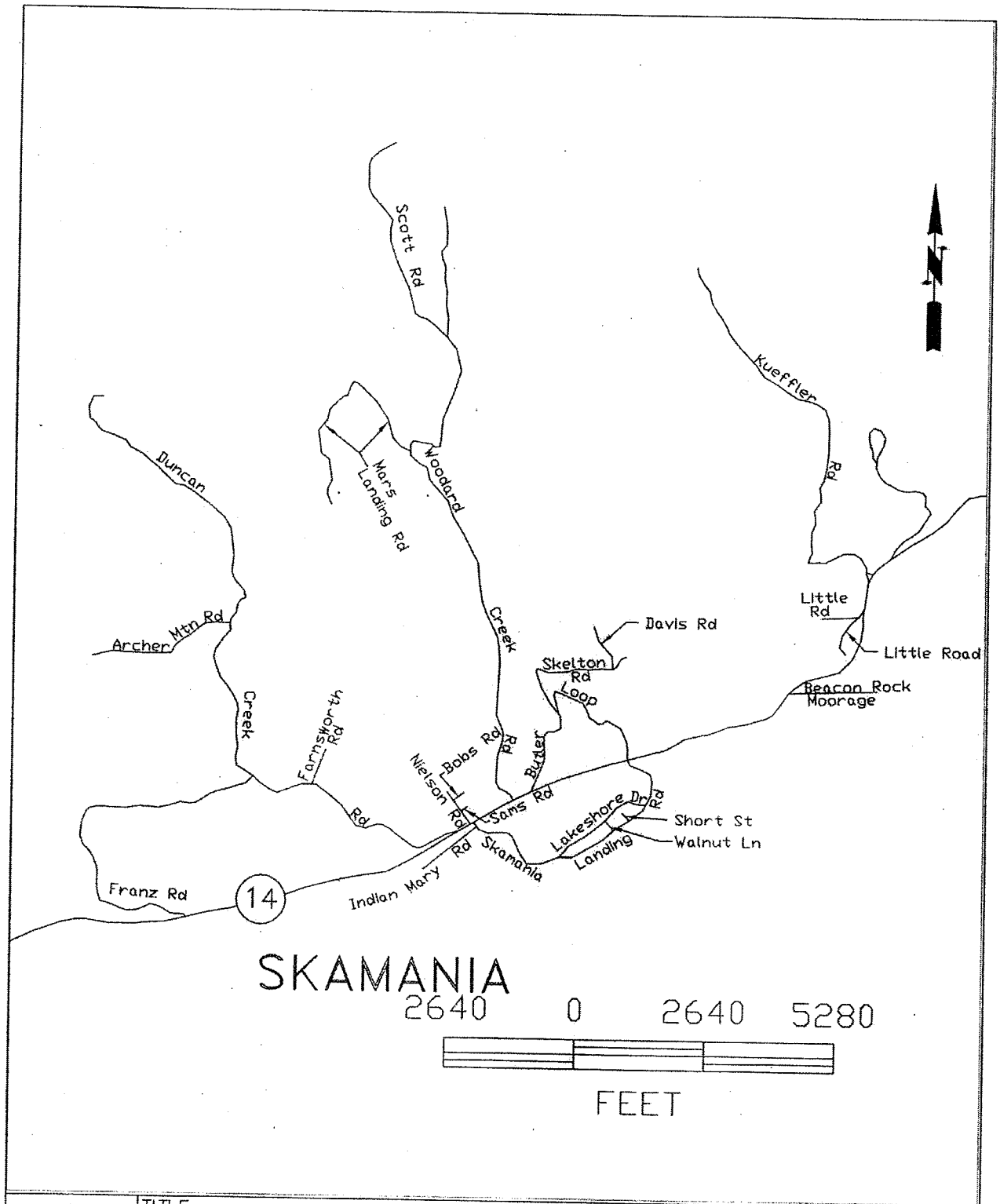
Goal T.3: Public Facilities and Services – Ensure that those public facilities and services necessary to support development should be adequate to serve the development at the time the development is available for occupancy and use without decreasing current service levels below locally established minimum standards.

Policy T.3.1: The feasibility of creating a local improvement district should be examined.

Policy T.3.2: Coordinate the Skamania County Comprehensive Plan Transportation Element with city, regional, and state transportation plans whenever possible.



SKAMANIA COUNTY WASHINGTON	TITLE: Skamania County Road System – District #1	DATE: 2/20/2007
	SKAMANIA COUNTY DEPARTMENT OF PUBLIC WORKS - COURTHOUSE ANNEX STEVENSON, WA 98648 (509) 427-9448	Figure 4–1
		SHEET NO. 1



SKAMANIA COUNTY WASHINGTON	TITLE: Skamania County Road System – District #1	DATE: 2/20/2007
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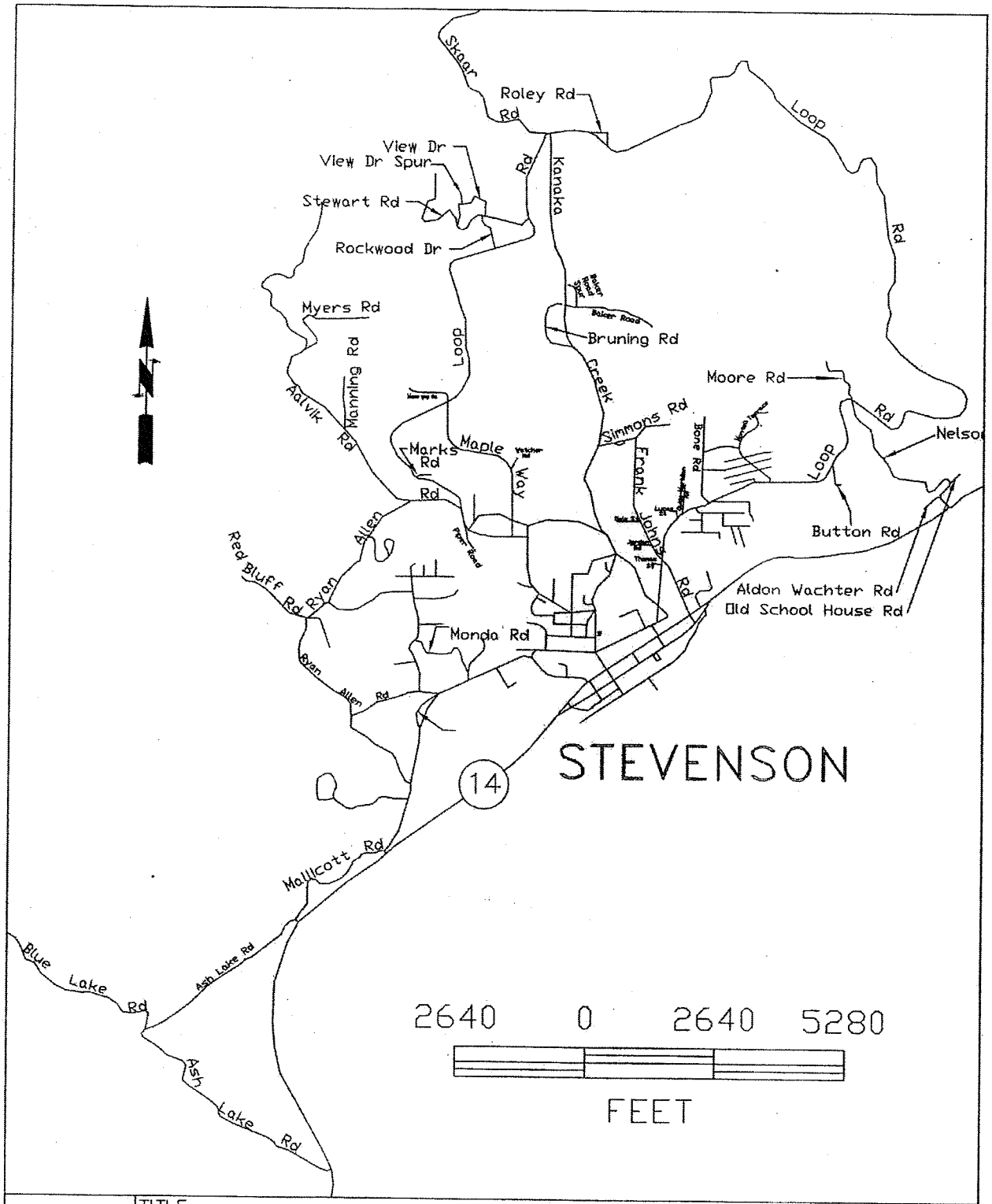
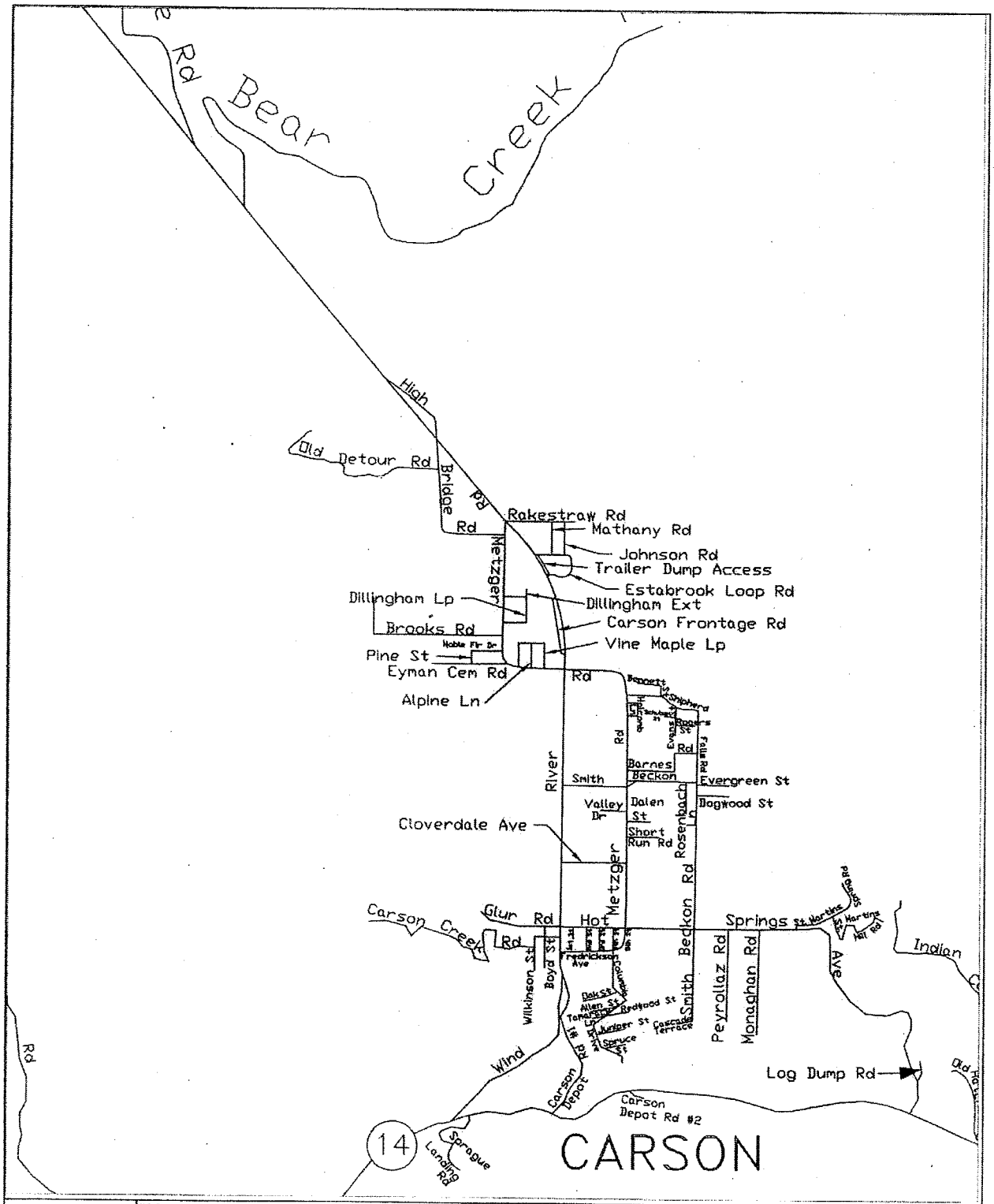
		SHEET NO. 2



SKAMANIA COUNTY WASHINGTON	TITLE: Skamania County Road System – District #2	DATE: 2/20/2007
	SKAMANIA COUNTY DEPARTMENT OF PUBLIC WORKS - COURTHOUSE ANNEX STEVENSON, WA 98648 (509) 427-9448	Figure 4–1
		SHEET NO. 3



SKAMANIA COUNTY WASHINGTON	TITLE: Skamania County Road System – District #2	DATE: 2/20/2007
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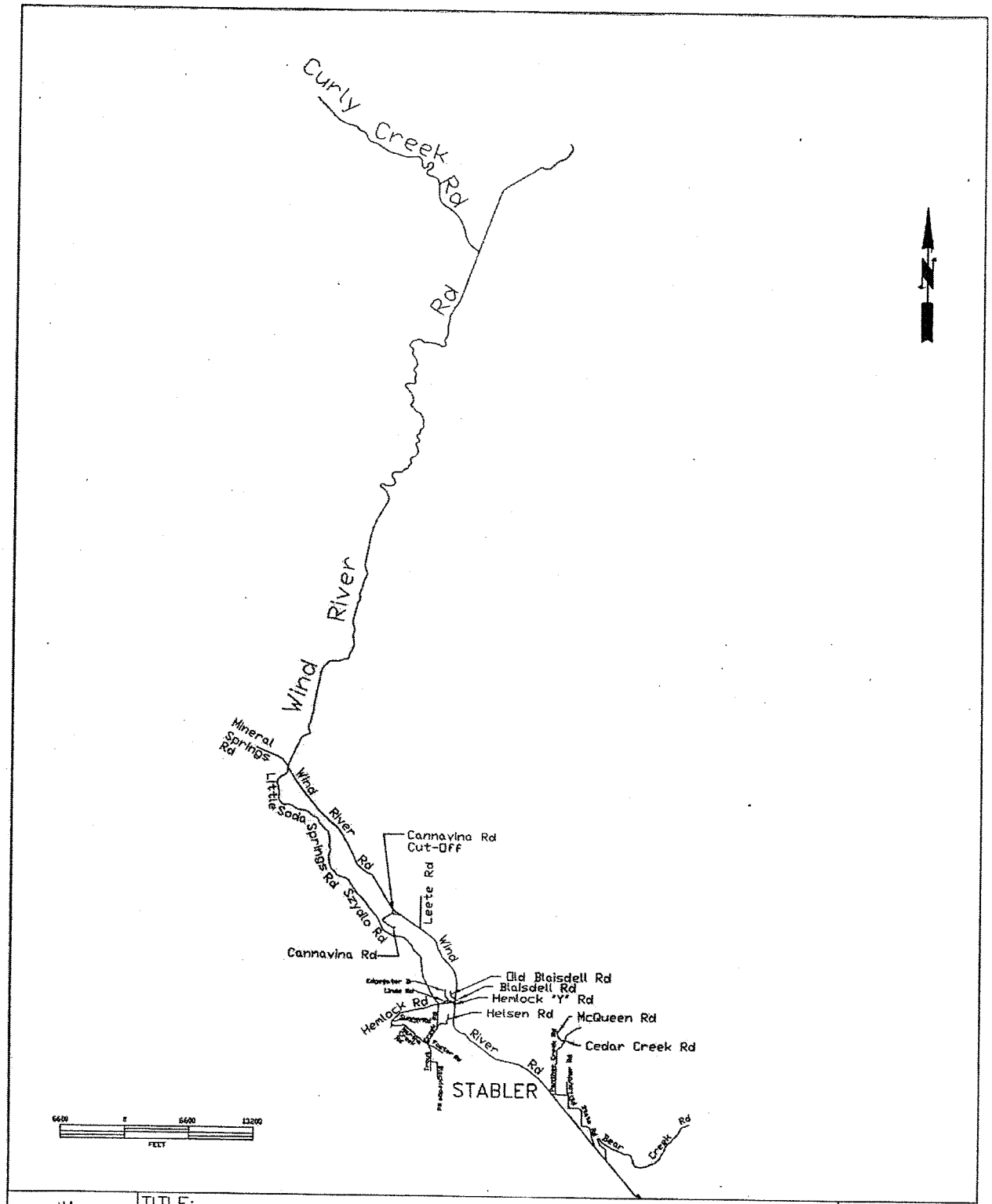
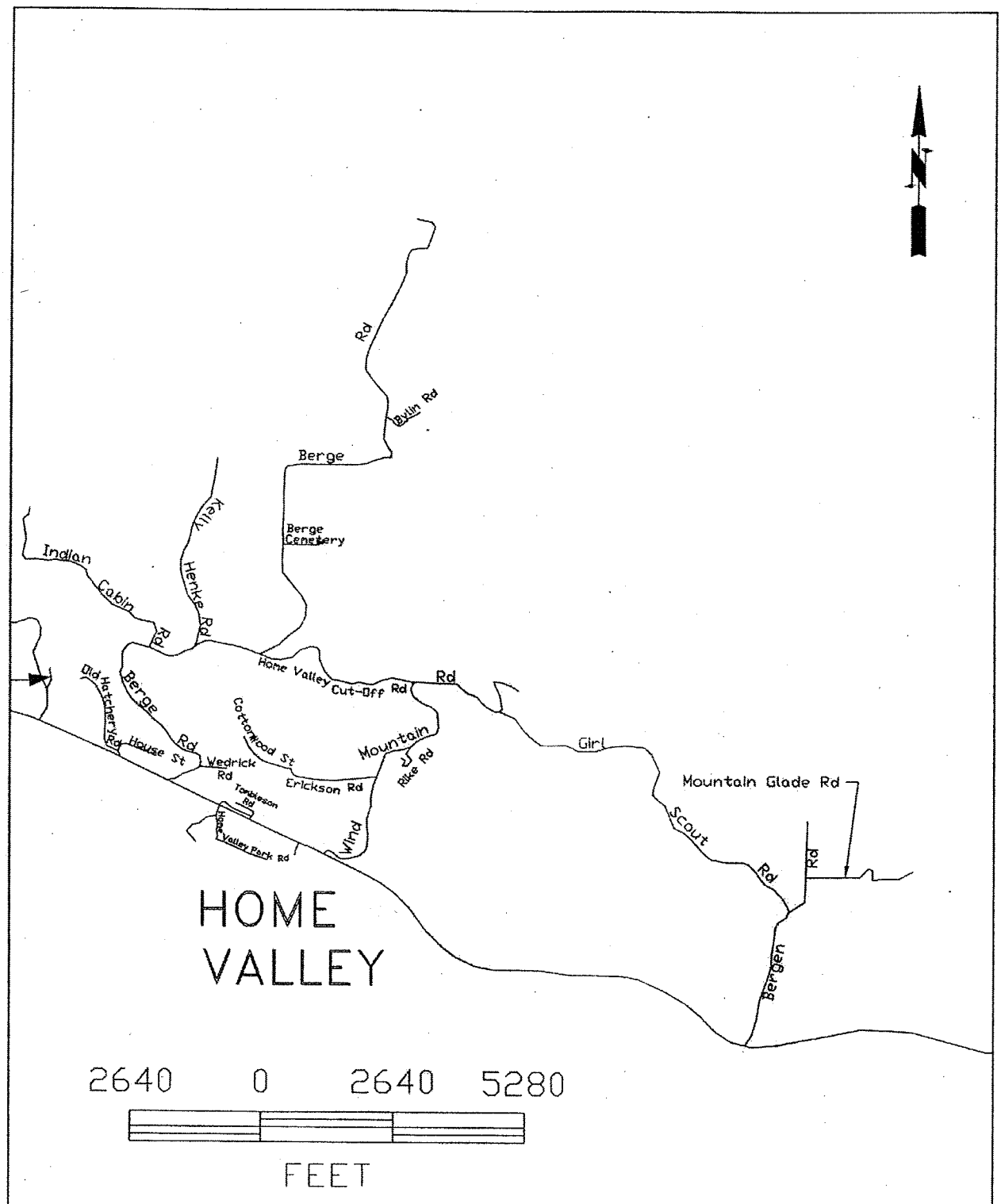
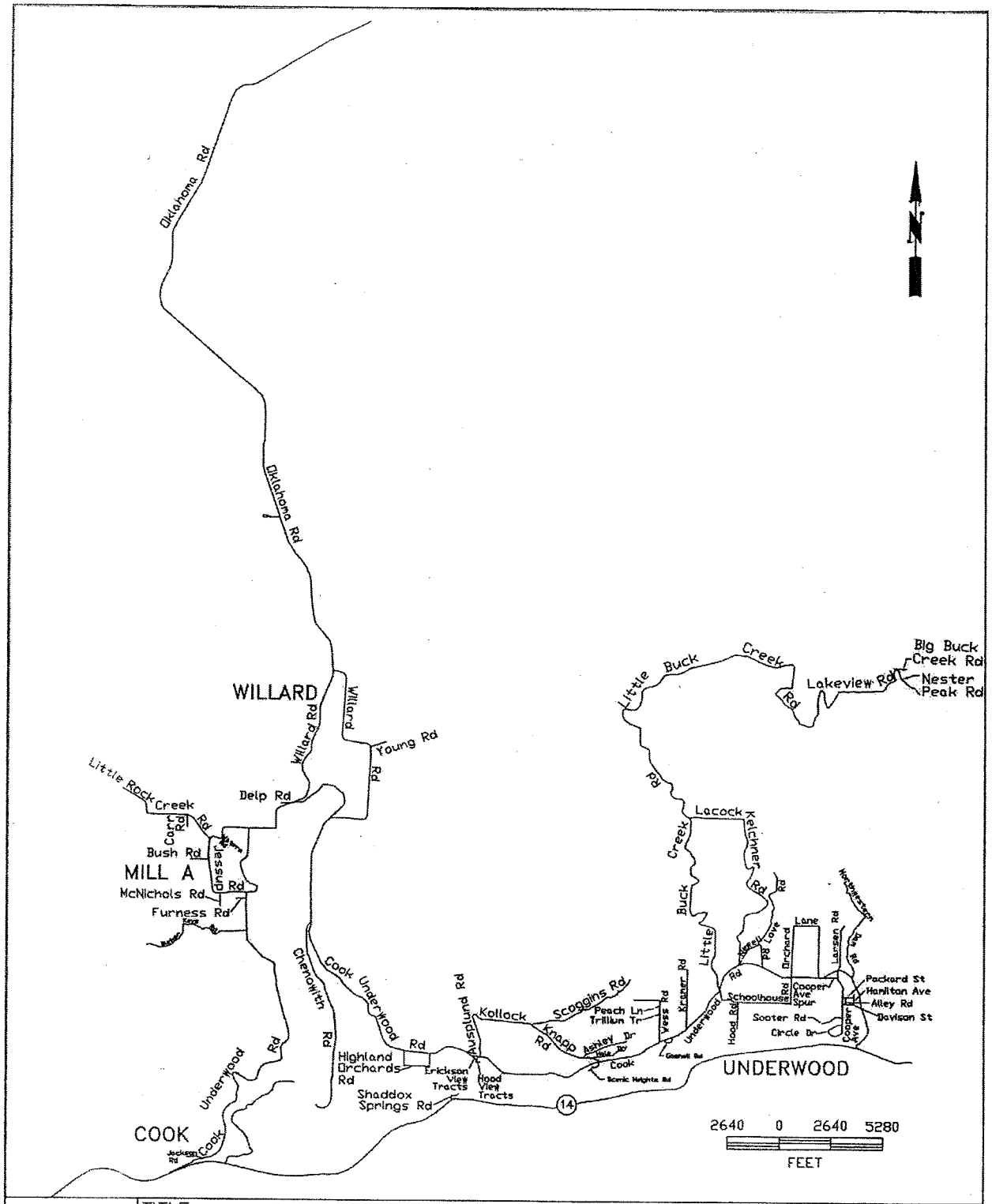
		SHEET NO. 4



SKAMANIA COUNTY WASHINGTON	TITLE: Skamania County Road System – District #2	DATE: 2/21/2007
	SKAMANIA COUNTY DEPARTMENT OF PUBLIC WORKS - COURTHOUSE ANNEX STEVENSON, WA 98648 (509) 427-9448	Figure 4–1
		SHEET NO. 5



SKAMANIA COUNTY WASHINGTON	TITLE: Skamania County Road System – District #3	DATE: 2/20/2007
	SKAMANIA COUNTY DEPARTMENT OF PUBLIC WORKS - COURTHOUSE ANNEX STEVENSON, WA 98648 (509) 427-9448	Figure 4–1	SHEET NO. 6



SKAMANIA COUNTY WASHINGTON	TITLE: Skamania County Road System – District #3	DATE: 2/21/2007
	SKAMANIA COUNTY DEPARTMENT OF PUBLIC WORKS - COURTHOUSE ANNEX STEVENSON, WA 98648 (509) 427-9448	Figure 4–1
		SHEET NO. 7

CHAPTER 5: ARCHAEOLOGY AND HISTORIC PRESERVATION ELEMENT

Introduction

Skamania County is richly rooted in cultural and historic resources that date back thousands of years. Native Americans have been in the area since time immemorial, Lewis and Clark came through Skamania County on their expedition with the Corps of Discovery in 1804-1806, as well as Skamania County was a heavy timber producing county in the early 1900's. Knowledge of Skamania County's history can provide a context to understand current growth and development trends, as well as a sense of continuity and community.

The Nez Perce, Umatilla, Warm Springs and Yakima Indian tribes signed treaties with Congress in 1855. In the year 2000 the Cowlitz Indian tribe was acknowledged as a tribe by the federal government. These treaties ceded to the United States legal title to millions of acres of land. They also reserved and guaranteed certain aboriginal rights exercised by Native American people since time immemorial. These legally protected rights belong to each Indian tribe and are regulated and enforced by the respective Native American tribal governments. The Native American tribal governments exercise inherent sovereign powers, as limited by treaty or act of congress. Skamania County must observe Native American treaty rights and recognize that these tribes have many archaeological and cultural resources within the county.

The Archaeological and Historic Preservation Element of the Skamania County Comprehensive Plan coordinates and directs the protection of sites 50 years or older with architectural, cultural, historical, and/or community heritage. Only through sound historic preservation principles, community recognition, and a respect for Skamania County's heritage can we continue to maintain the historic resources that exist in the area.

Federal and State Regulations

National Historic Preservation Act

The National Historic Preservation Act of 1966 authorized the creation of the National Register of Historic Places as a means of recognizing sites and structures associated with significant people or events in our nation's history. Sites or structures listed on the National Register are provided protection through various federal funding sources. The National Historic Preservation Act of 1966 prevents federal projects from demolishing federally funded sites without careful consideration. Placement on the register is strictly voluntary for private landowners and provides no absolute protection.

Washington State Department of Archaeology and Historic Preservation

The Washington State Department of Archaeology and Historic Preservation (DAHP) performs the functions of the state Historic Preservation Officer (SHPO), which were established by the National Historic Preservation Act. DAHP maintains records of all historic resource inventories and sites and acts as a liaison between local agencies and the federal government. DAHP is also responsible for reviewing proposed federal projects for their potential impact on historic and archaeological resources. As of the year 2006, one thousand (1,000) cultural and historic sites have been recorded in Skamania County

Columbia River Gorge National Scenic Area

In 1986, Congress of the United States passed the Columbia River Gorge National Scenic Area (CRGNSA) Act. The CRGNSA Act designated over 90,000 acres of Skamania County to be included in the Columbia River Gorge National Scenic Area. The CRGNSA encompasses portions of six counties within the States of Oregon and Washington. In 1987, the States of Washington and Oregon entered into the bi-state compact to form the Columbia River Gorge Commission. In 1991, the Columbia River Gorge Commission adopted the National Scenic Area Management Plan, which acts as the comprehensive plan within the CRGNSA. The Management Plan sets out specific policies and guidelines affecting cultural and archaeological resources.

In 1994, Skamania County adopted development regulations that were deemed consistent with the Management Plan for the CRGNSA by the Gorge Commission and the United States Secretary of Agriculture. This approval allows for county administration and jurisdiction over these lands within Skamania County. The developments regulations were amended in 2006 to be consistent with the Revised Management Plan.

Archaeology and Historic Preservation Element Goals and Policies

Goal AHP.1: Identify and encourage the preservation of lands, sites, and structures that have historical or archaeological significance.

Policy AHP.1.1: Working with Washington State Department of Archaeology and Historic Preservation (DAHP) and other interested agencies and organizations, the county should create, maintain and update the current inventory of historic, archaeological and cultural resources in Skamania County.

Policy AHP.1.2: The County should adopt a predictive model in order to identify when a cultural resource survey should be required of an

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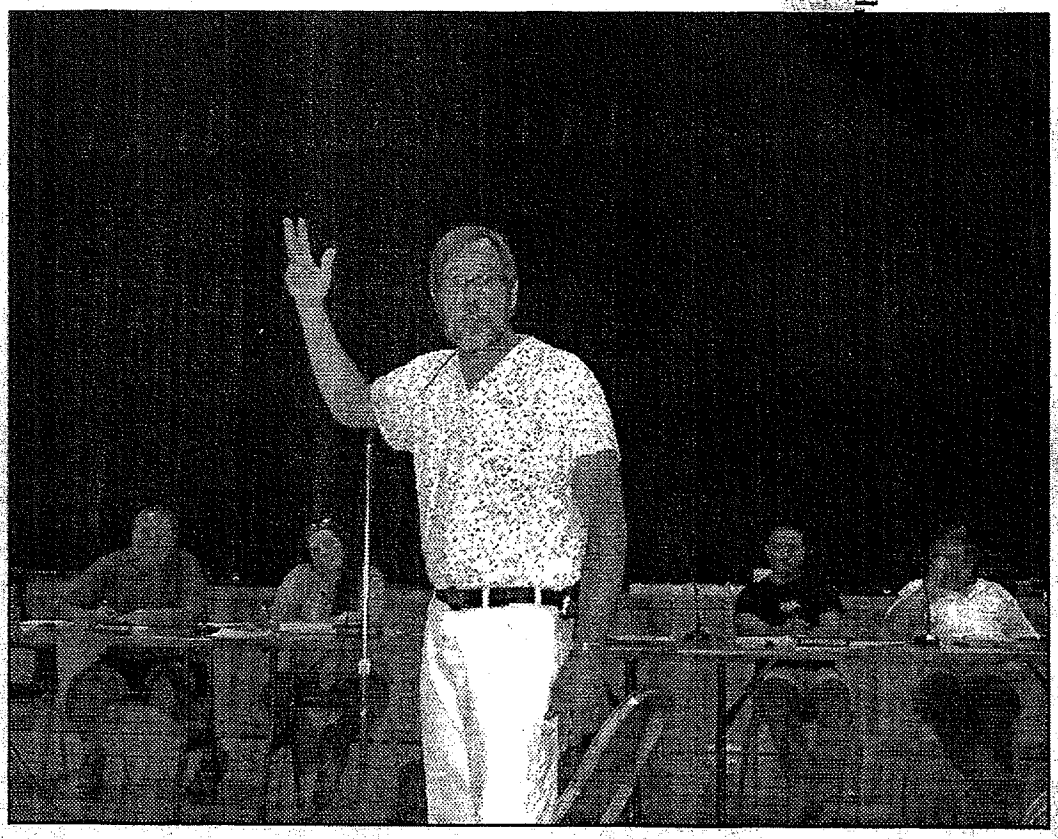

Where there's a Willard...

Kurt Rohrbacher's wry comment — "Public input is a wonderful thing" — and remark about lack of funding for his fire district added some levity to June 24 hearing.

Zoning hearing held over to July 8

During a June 24 hearing on zoning for Skamania County outside the scenic area, a complaint echoing in the cavernous Mill A School gym was what many felt was a lack of adequate time to submit public comment.

By the end of the three-hour hearing, Planning Commission members had heard enough. They not only extended the deadline, they scheduled a July 8 continuation at 7 p.m. at Rock Creek Center in Stevenson.

Originally, they wanted to hold over the June 24 meeting to accommodate those who had spoken at two previous hearings but wanted to be heard again. Then they decided to open up testimony to all who sign up on July 8, also the new deadline for written comment, which must be received by 5 p.m.

Deliberations on changes incorporating comments received and Planning Commission suggestions will be held at 7 p.m. July 28, also at Rock Creek Center. The July 15 hearing has been canceled.

Those recommendations will be passed on to the Board of Commissioners, which will schedule workshops on the changes.

By the June 24 hearing the Planning Commission had received 200 written comments.

Among those testifying June 24 were Northwestern Lake cabin residents, who are asking for a special recreation zone for that area. There are 43 cabins on 102 acres with long-term leases.

Some owners of parcels in the Swift Reservoir subarea also testified after driving from as far as Woodland.

Mary Sauer objected to the camping cabin limitation of 500 square feet, saying additional room is needed for storage and a deck.

The two issues heard most frequently June 24 were the lack of a conditional use process for industrial wind turbines on large forest parcels, and the provision allowing for hazardous waste storage in commercial areas.

There should be a larger setback for wind turbines, several Underwood residents urged, Agro-tourism has a great potential in the area, said John Crumpacker, who is opening a tasting room. Winery production and wind power are "competing interests," he said.

Those comparing hazardous waste storage to Love Canal or the Erin Brockovich movie may think of it as "scary," said Walt Loehrke, but "the State of Washington won't let it happen. There is SEPA review."

SCP 2 JULY 2008

*Skamania County Shoreline Management Master Program – July 1986
*Skamania County Affordable Housing Study – September 2001
Priority Habitat Data Books – June 2005
Cost of Community Services Studies – 2002
Population Projection Tracking Report from OFM – January 2006
Soil Survey of Skamania County Area, Washington – October 1990
Report of Findings For Skamania County Comprehensive Plan Update Visioning Exercise with Emphasis in the Swift Area – June 2006
Skamania County GMA Compliance Review for Critical Areas – Phase II 2006 Critical Areas Update Process – June 2006
Volcano Hazards in the Mount Adams Region, Washington – USGS – 1995
Volcano Hazards in the Mount Saint Helens Region, Washington - USGS - 1995
Volcano Hazards in the Mount Hood Region, Oregon – USGS - 1997
WRIA 25 & 26 Watershed Plan – adopted 2006
WRIA 27 & 28 Watershed Plan – adopted 2006
WRIA 29 Watershed Plan – adopted 2006

* The document is available for purchase at the Skamania County Planning Department.

Appendix Item 2:

The following are resource documents and maps that were used for the 2007 Comprehensive Plan and Map update process. Most of these documents are available for review from the Planning Department, and other documents must be obtained from the department or agency that created the documents (or maps). However, the Priority Habitat Maps and data, and the Cultural and Historic Resource Maps are sensitive information and cannot be released by the County.

Resource Maps:

WRIA 25 & 26 Basin & Sub-basin maps – Department of Ecology – January 2004
WRIA 27 & 28 Basin & Sub-basin maps – Department of Ecology – January 2004
WRIA 29 Basin & Sub-basin maps – Department of Ecology – December 2006
Topography and Stream maps – Department of Natural Resources (DNR) – August 1997
Topography and Stream maps – Department of Natural Resources (DNR) – 2007
Skamania County Soil Survey maps – October 1990
Soil Liquefaction Susceptibility Maps – DNR – September 2003
Priority Habitat Maps – Department of Fish & Wildlife – February 2007
National Wetland Inventory maps – US Department of Interior – 1993
Flood Insurance Rate Maps of Skamania County – FEMA – February 1986
Geologic Map of Washington - Southwest Quadrant – 1987
Orthophoto Maps – DNR – 2003
Skamania County Comprehensive Plan A maps – 1977
Skamania County Shoreline Maps - 1974
Clark County 20-Year Rural and Natural Resources Map – February 2001
Clark County Zoning Map – May 2001
Cowlitz County Comprehensive Plan Map – September 1994
Cultural and Historic Resource Maps - 2007
Volcano Hazard Map of the Mount Adams Region, Washington – USGS – 1995
Volcano Hazard Map of the Mount Saint Helens Region, Washington - USGS - 1995
Volcano Hazard Map of the Mount Hood Region, Oregon – USGS – 1997
Gifford Pinchot National Forest Map - 1999

Other Resource Documents:

*Skamania County Comprehensive Plan A – 1977
*Skamania County Comprehensive Plan A Amendment for Critical Areas - 1992
Skamania County Emergency Operations Plan – September 2003
Skamania County Comprehensive Emergency Management Plan –January 2004
Skamania County Community Action Plan Update – June 2003
Skamania County Parks and Recreation Master Plan – July 2001
Skamania County Regional Transportation Plan – February 2006

CHAPTER 6: APPENDICES

Appendix Item 1:

Text Plan Amendments to the 1977 Comprehensive Plan "A"

Year Adopted	Brief Description of Text Amendment
1991	National Scenic Area (NSA) Management Plan text adopted to apply to all land within the National Scenic Area Boundary, excluding urban areas (Home Valley, Carson, City of Stevenson, and City of North Bonneville) – **National Scenic Area Subarea Plan**
1994	Carson Subarea Plan text adopted to apply to all lands within the Carson Urban Area (**Carson Subarea Plan**)
1996	Critical Areas text adopted to apply to all lands within the geographical boundaries of Skamania County excluding the City of Stevenson and the City of North Bonneville to meet the requirements of the Washington State Growth Management Act
2007	Westend Subarea Plan text adopted to apply to all lands within the area known as the Westend (T1N, R5E; T2N, R5E; T3N, R5E; T1N, R6E; T2N, R6E; T3N, R6E WM lying North of NSA boundary and South of Gifford Pinchot National Forest boundary) – **Westend Subarea Plan**

the pending Swift Subarea should require the land owner to hire an archaeologist to perform a cultural and historical reconnaissance survey of the area to be disturbed, prior to any ground disturbing activities taking place.

applicant. This model should be based on landscape, known sites, proximity to water, the amount of proposed ground disturbance, etc.

Policy AHP.1.3: Coordinate county inventory efforts with Native American groups and governmental efforts.

Goal AHP.2: Increase recognition of historic, archaeological, and cultural resources.

Policy AHP.2.1: Public awareness of cultural resources should be increased through educational and interpretive projects that highlight sites included on the county inventory or those eligible for inclusion in local and/or state heritage registers, or National Registers of Historic Places.

Policy AHP.2.2: County employee awareness of cultural resources should be increased through training about cultural heritage preservation issues, including training related to state and federal penalties for disturbance, destruction or removal of archaeological resources.

Goal AHP.3: Protect historic, archaeological and cultural resources through a comprehensive planning approach.

Policy AHP.3.1: Create the county's policies for consistency regarding preservation of cultural and historic resources.

Policy AHP.3.2: The zoning ordinance should be revised to include provisions to permit the review of individual development, redevelopment and demolition plans to ensure protection and minimize the impacts on cultural, historic and, particularly archaeological resources.

Policy AHP.3.3: Establish a process for the resolution of land use conflicts relating to the preservation of historic, archaeological and cultural resources.

Policy AHP.3.4: Provide assistance to developers, landowners, and the construction trade regarding appropriate re-use and rehabilitation of identified historic sites and buildings.

Policy AHP.3.5: Require notice to be recorded in the Skamania County Auditor's office deed records to inform future buyers that the property is within 500 feet of a known archaeological site.

Policy AHP.3.6: All development within the area of the pending Swift Subarea should be reviewed to determine if the site is in a high probability area to prevent disturbance of archaeological resources. Until a predictive model is adopted by Skamania County, all new ground disturbing activities within the area of

Scoping Comment #326

Bhavnani, Monica (CTED)

From: Mark King [[redacted]@gorge.net]
Sent: Monday, May 18, 2009 11:03 AM
To: CTED EFSEC
Subject: Whistling Ridge Energy Project - Scoping Comments

Follow Up Flag: Follow up
Flag Status: Flagged

Attachments: NWLDHA-WhstlgRdg_5-15-09.pdf

NWLDHA-WhstlgRdg_5-15-09.pdf (...

Dear Mr. Fiksdal,

Attached, in pdf format, are Comments from the Board of Directors of the Northwestern Lake Development Homeowners' Association regarding the Whistling Ridge Energy Project.

I would greatly appreciate it if you could send a Reply that confirms receipt of our Comments, and confirming that they are in an acceptable format.

Thank you,

Mark King, President
NW Lake Dev. Homeowners' Association
(509) 493-[redacted]

NORTHWESTERN LAKE DEVELOPMENT HOMEOWNERS' ASSOCIATION
172 Upper Lakeview Road, White Salmon, WA 98672
email: <black@gorge.net>

May 15, 2009

Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council (EFSEC)
Via e-mail to efsec@cted.wa.gov

Re: Whistling Ridge Energy Project – Application No. 2009-01: Scoping Comments.

To EFSEC and BPA:

The Board of Directors of Northwestern Lake Development Homeowners' Association submits the following comments regarding the scope of the Environmental Impact Study (EIS) to be conducted by EFSEC and BPA with respect to the Whistling Ridge Energy Project (the Project).

I. Introduction.

We represent the owners of 30 residential properties located near the mouth of Little Buck Creek where it empties into Northwestern Lake. There are currently 23 residences built, most of which are full-time residences (as distinct from most recreational cabins located along Northwestern Lake). Our community is approximately two miles east of the Project, and is near the bottom of the Little Buck Creek watershed. The Project would sit at the head of this watershed. Because of our proximity to the Project, we have major concerns about the possible adverse effects it might have on us and our environment.

Our residents have invested significant amounts of time, energy, money, and especially emotion in building homes and lifestyles focused on our rural, sylvan environment. While we have always known we would be affected by various rural activities such as agriculture and timber operations, we never anticipated that a major industrial activity like a wind farm could be located so near to us. We have grave concerns about several possible adverse effects of the project, and consequent reservations about the location of the Project. We therefore request that EFSEC and BPA carefully study and analyze all possible adverse effects of the Project in its proposed location and evaluate whether other locations would be more appropriate for this type of project.

II. Scoping Issues.

A. Potential Adverse Effects.

1. Noise.

The dominant concern expressed by our Members has been fear that noise from the Project will be a constant nuisance whenever our windows are open, or when we are outside our homes. Although we are located two miles from the Project, we are concerned that this distance

will not protect us due to our geography and wind patterns. The Project will be located at the head of the Little Buck Creek watershed. We are concerned that sound from the Project will echo off valley walls and have an amplified effect on us. In addition, the prevailing winds in the summer (when we are outside most) blow from the Project straight to our homes. So we are also concerned that the wind will carry more noise from the Project to us.

SDS's application has a sound map suggesting that our area will receive 20+ dB of sound from the Project. It is not at all clear to us how this map was produced or whether it is reliable. Perhaps more important, based on reports we have read from residents located near active wind farms, specific decibel measurements might not be the best way to determine whether noise from wind turbines will have an adverse effect. Some of the strongest complaints about wind turbine noise are due to the low-frequency sounds - a constant "whumping" similar to the bass beat that can be heard (and felt) from certain car stereos even from a great distance, and even with the windows rolled up. We have heard that these low frequency sounds can sometimes have much greater impact at a distance than they do at the point of creation. We are therefore very worried about how such sounds might affect us.

It is our understanding that few if any wind projects have been built in terrain with valleys and ridges like ours. So it seems there is very little track record for predicting how noise from the Project might affect us. We therefore request that the EIS make very extensive studies of how sound from the Project will affect us and other residents. In particular, we think tests should be conducted that reproduce, at the Project site, the noise from a project of this size as accurately as technologically possible. Measurements of the noise should be taken not only with instruments, but more importantly, with surveys of the subjective impressions of all affected residents. Unless such surveys are taken, we do not believe an accurate prediction can be made regarding noise effects of the Project.

Lastly, in evaluating whether such noise effects (or any other effects to people) are considered "adverse", we request that EFSEC and BPA rely not on statutory definitions based on decibel levels. Rather, a conclusion that an effect will be "adverse" should be determined by whether the effect will <u>unreasonably diminish the enjoyment of day-to-day life</u>.

3. <u>Lights</u>.

Another complaint we have read about wind turbines regards aviation lights. We request that the EIS investigate what types of light (color, synchronization, quantity, etc.) would have the least impact to people and wildlife. We also request that the EIS evaluate what, if any visual effects aviation lights will have on the night sky in our community (for example, will we see reflections of the lights in the sky on cloudy nights, or even on clear nights?) Likewise, we have read of complaints about "shadow-flicker" from wind turbines. We request that the EIS evaluate whether late afternoon "shadow flicker " will affect our residences, or be visible on the ridges to the east of our community.

3. <u>Environment</u>.

There are many items that should be considered from an environmental and ecosystem perspective regarding a large project like this. All projects like this have an "environmental cost" and although it may not appear to affect our community directly, it does affect the earth; ultimately we are all reliant on the environmental resources of the earth to keep us and all other living creatures alive. In particular, we are concerned that, due to this Project's location in a forest ecosystem, far more wildlife will be negatively affected or harmed than if it were located in a wheatfield or open plain environment. We are also concerned about whether there will be

effects to groundwater and surface water. We request that the EIS carefuly evaluate what effects the Project would have on wildlife and the ecosystem.

4. Economics.

While proponents of the Project have correctly emphasized that it could bring some welcome jobs and tax revenues to the area, our Members are quite concerned that if the Project adversely affects our homes, our property values will also be adversely affected. The EIS should evaluate all financial effects of the Project, including specific estimates of diminished property values (region wide) due to reasonably foreseeable adverse effects of the Project.

5. Views.

Our Members have mixed opinions as to whether they would necessarily object to views of the wind turbines, however, most believe that structures of this nature are not in keeping with the spirit or beauty of a National Scenic Area even though such structures are built on land that is just outside of the boundary.

B. Location of the Project.

It would appear that there are much better places to site a project of this magnitude. There are thousands of acres of farmland in Eastern Washington that can (and do) support this type of development. The land to the East is vast, it's close to transmission lines, it is many miles away from homes, has limited recreational value, limited wildlife (as compared to a forest), limited renewable resource (as compared to the timber resources here), there is limited damage to the ecosystem due to installation and it would not detract from views of a National Scenic area. We request that the EIS fully evaluate all of these considerations.

C. Precedent.

We believe it is critical that the EIS address the potential precedent that would be set by approval of this Project. Because it is the first wind farm in Washington to be located in a forest environment (we are told), adjacent to a National Scenic Area, and close to so many residences, a very detailed and thorough analysis of its potential impacts must be provided. Approval of the current application for this project will have precedential effect not only for projects in other regions, but also for expansion of this Project. SDS and DNR have acknowledged that they are investigating a major possible expansion of this Project onto DNR land. We do not know if SDS will seek to expand this Project even further on its own adjacent lands (which would be closer to our community.) However, we are worried that if this Project is approved now based on it's smaller size, it will be very difficult to prevent expansions that might initially have been rejected based on an upfront perspective of the total impacts. Consequently, we request that the EIS take the broadest possible view when evaluating the impacts of this Project.

(continued)

III. Conclusion.

We fully support renewable energy and believe it is critical that we embrace it, however, like anything else there are many alternatives to reaching the goals of green power. Some locations are inherently better than others for meeting these goals without imposing undue burdens on the environment or people living near the projects. Given that there are abundant optional locations for this type of project, we cannot support this Project until there is conclusive documentation that it will not have "adverse effects" on our lives and our environment. We respectfully request that EFSEC and BPA rigorously investigate, document, and evaluate our concerns. Thank you.

Sincerely,

Board of Directors: Mike Gundlach, Lynden Hollowell, Mark King, Nanci Sayler, Kit Silver.
Northwestern Lake Development Homeowners' Association

Scoping Comment
#327

Bhavnani, Monica (CTED)

From: Mark E. Kelch [[redacted]@gorge.net]
Sent: Monday, May 18, 2009 11:22 AM
To: CTED EFSEC
Subject: Windmills in the Gorge

If windmills are located within the Columbia Scenic area or **are visible from scenic area soil**; they should have to be constrained to the same conforming restrictions that home owners have to endure.

Exceptions to the Scenic Act will weaken the Scenic Act to a wholesale attack by developers.

Mark Kelch

[redacted]@gorge.net

[redacted]
Mosier, OR 97040

Scoping Comment
#328

Bhavnani, Monica (CTED)

From: Trenter, Jamie [redacted]@ins-lua.com]
Sent: Monday, May 18, 2009 11:36 AM
To: CTED EFSEC
Subject: FW: Allen Fiksdal Letter
Attachments: Allen Fiksdal letter 090518.pdf

Allen

Please see attached letter in respects to the "Whistling Ridge Energy Project". Please contact me if you have questions.

Sincerely

Jamie Trenter

-----Original Message-----
From: Croft, Megan L.
Sent: Monday, May 18, 2009 11:32 AM
To: Trenter, Jamie
Subject: Allen Fiksdal Letter

Megan Croft
Western Region Administrative Assistant
Lumbermen's Underwriting Alliance
LIG Insurance Agency
[redacted]
Portland, OR 97219
(503) 977-[redacted] phone
(800) 561-[redacted] toll free
(503) 977-[redacted] (fax)
[redacted]@ins-lua.com

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CHRISTINE E. LYNN
CHAIRMAN OF THE BOARD
AND CHIEF EXECUTIVE OFFICER

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TELEPHONE (503) 977-1030 • FAX (503) 977-1041 • TOLL FREE (800) 561-8362

JAMIE TRENTER
VICE PRESIDENT
WESTERN REGION

May 18, 2009

Mr. Allen Fiksdal
efsec@cted.wa.gov

RE: Whistling Ridge Energy Project

Dear Allen,

Future economic forecast in the next decade indicate significant population growth for the greater Portland, Oregon area including Hood River, Oregon and Skamania County, Washington. It is undeniable Washington and Oregon are going to need more power on the grid in the near future to support this growth. The USA and Washington need to be less dependent on foreign resources when there are excellent resources in our own back yard.

Unlike several other energy options, wind power is clean, costs nothing to extract, and is waste free. In addition wind energy goes hand in hand with the new Obama administration goals and expectations to grow clean energy. Whistling Ridge Energy Project will provide many new renewable energy jobs, provide more income from local spending and property taxes, and provide a cleaner use of energy.

The Whistling Ridge Energy project will help improve the Skamania County and Washington unemployment rate and at the same produce energy that is more globally responsible.

Best Regards,

James T. Trenter

James T. Trenter, CPCU, ARM
Regional Vice President – Western Region
JTT:mlc

Scoping Comment
#329

FAX

To: Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, WA 98504-3172 360-956-2158

Date: May 18, 2009

From: Michael Ritter
Washington Department of Fish and Wildlfie

Subject: EFSEC Application 2009-01, Whistling Ridge Energy Project

4 pages total

Hard Copy via USPS

RECEIVED
MAY 18 2009
ENERGY FACILITY SITE
EVALUATION COUNCIL

State of Washington
Department of Fish and Wildlife
Habitat Program - Major Projects Division - Wind and Water Energy Section

Mailing Address: 2620 North Commercial Avenue (509) 543- 3319
Main Office Location: 2620 North Commercial Avenue -- Pasco, WA 99301

MWR-07-09

May 14, 2009

Allen J. Fiksdal, EFSEC Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
905 Plum Street SE
Olympia, WA 98504-3172

SUBJECT: Whistling Ridge Windpower Project, EFSEC Application No. 2009-01

Dear Mr. Fiksdal:

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced documents and offers the following comments at this time. Other comments may be offered as the project progresses.

General Comments

Based solely on the data contained in the application, and subsequent data that will likely be presented in the EIS, the proposed Whistling Ridge Wind Energy Project could have adverse impacts to birds and bats. Therefore, WDFW recommends additional studies, as identified in section 2.17.2, specifically, northern goshawk and bat surveys. However, it is uncertain that the additional data on northern goshawks, northern spotted owls, and bats coupled with the existing avian and bat data will alleviate WDFW concerns with potential impacts to birds and bats with this wind energy project. The habitat is predominately managed coniferous forests, a characteristic that has likely resulted in the high raptor, bat, and bird use/occurrence recorded at this site, and a habitat type that has little to none avian and bat data, impacts, and conclusions associated with wind energy development.

There is a lack of comparable wind power projects in coniferous forests any where in the U.S. from which we can assess preconstruction avian and bat data with operational fatality. However, based on the data and statements such as, "thus, based solely on the

presumed relationship between pre-construction bat activity and post-construction fatalities, bat mortality rates at SWRA may be higher than many other wind resource areas in the U.S" and "based on data collected during this study, raptor use of the Saddleback project area is...moderate to moderately high compared to most other WRAs evaluated throughout the western and Midwestern U.S" our approach to this project at this point in time is to proceed cautiously, carefully consider, protect, and conserve the natural resources of the site and adjacent lands, and slow down the incentivized green energy freight train that is barreling through the State of Washington.

Specific Comments

We recommend that the information presented on the Northern Goshawk, a State Candidate Species for listing and a Federal Species of Concern, be consistent throughout the application. For example, on Page 1-8 it states that "although no goshawks were detected during protocol surveys, individuals were spotted during general avian migration and breeding surveys." This is in contrast to the information in Section 2.17.2 that states "no goshawks were found on the project site, nor were any observed on any surrounding properties. It is highly unlikely that goshawks will be found on the project site..." However, the data in Appendices B-5 and B-6 indicate that northern goshawks were recorded during both the Fall 2004 and Summer 2006 surveys. Additionally, Section 2.17.2 states that goshawk, and other avian species surveys were conducted ion 2004, 2005, and 2008. The appendices indicate that these surveys were also conducted in 2006.

We recommend that any statements addressing raptor mortality of operational wind power projects in shrub-steppe and agricultural habitats with the anticipated raptor mortality of this site be removed from any future reports as they are misleading. They are misleading because "other new wind plants in the Pacific Northwest" are in shrub-steppe and agricultural habitats; not coniferous forest..." We appreciate that an attempt was made to suggest that raptor mortality "is expected to be low." However, based on information in the application, raptor use of the site is high. In fact, ..."raptor use of the Saddleback area in Fall is approximately 1.5 times higher than mean fall use at the other WRAs." (in east Oregon and Washington) and that..."raptor use of the Saddleback project area...is moderate to moderately high compared to most other WRAs evaluated throughout the western and Midwestern U.S."

Comprehensive auditory surveys were conducted for northern spotted owls and goshawks in 2004 and 2008. While the 2004 goshawk surveys appears to include the proposed turbine string to the east of the "Cedar Swamp" the 2008 survey does not. Interestingly, one bird species, the Barred Owl, was recorded frequently during the northern spotted owl surveys, but was not included in any of the avian reports. Additionally, while no spotted owls were recorded, we question the suitability of a wind farm within one of the few spotted owl special management areas in the State of Washington.

The bat data is extremely interesting and alarming in that "no data on bat mortality levels associated with wind energy developments in western coniferous forests are available to help predict risk to bats at the Saddleback Wind Resource Area." The data in Table 4 in Appendix B-8 should serve as warning that the Whistling Ridge Project could result in bat mortality 3-4 times higher than any other wind power project in the U.S. From Table 4, bat activity is a fairly good predictor of bat fatality. Fatality is presented in the number of bats/turbine. Using the Saddleback bat activity data from the table (138.4 bats) with the proposed 50 turbines, almost 7,000 bats could potentially be killed on an annual basis. However, "bat fatality patterns may differ from those in open habitats as well as in eastern deciduous forests."

The Turbine Timber Buffer (Figure 2.3-4), may reduce the typical open turbine string corridor, thereby reducing its appearance as an avenue for bird and bat travel, but may also attract birds and bats as a roosting, foraging, and nesting habitat. At this point, we recommend that additional discussions occur to develop the most suitable management actions along the turbine strings.

We also recommend that sensitive features such as such as snags, water, Oregon white oak, and talus be identified as an aid to impact assessment.

We look forward to working with all interested parties through the development of this project.

Sincerely,

Michael Ritter

Michael Ritter
Wind Mitigation Biologist

Scoping Comment
#330

Bhavnani, Monica (CTED)

From: Fiksdal, Allen (CTED)
Sent: Tuesday, May 19, 2009 8:10 AM
To: Talburt, Tammy (CTED); Bhavnani, Monica (CTED)
Subject: FW: Whistling Ridge Wind Power Project

Follow Up Flag: Follow up
Flag Status: Purple

Attachments: Letter to A Fiksdal 051809.pdf

Allen Fiksdal
Washington State
Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98504-3172

Phone: 360-956-2152
Fax: 360-956-2158

Visit the EFSEC web site at: http://efsec.wa.gov/

From: Vervair, Candace (ATG)
Sent: Monday, May 18, 2009 5:16 PM
To: Fiksdal, Allen (CTED); '[redacted]@gorgefriends.org'; '[redacted]@aramburu-eustis.com'; '[redacted]@bpa.gov'
Cc: Marvin, Bruce (ATG)
Subject: Whistling Ridge Wind Power Project

Please find attached a letter regarding Whistling Ridge Wind Power Project from Assistant Attorney General H. Bruce Marvin:

Letter to A Fiksdal 051809.pdf...

Candy Vervair, Legal Assistant
Office of the Attorney General
Government Compliance and Enforcement
(360) 664-[redacted]
Fax: (360) 66[redacted]
[redacted]@atg.wa.gov

Rob McKenna
ATTORNEY GENERAL OF WASHINGTON
Government Compliance & Enforcement Division
PO Box 40100 • Olympia, WA 98504-0100 • (360) 664-9006

May 18, 2009

Allen Fiksdal
Energy Facility Site Evaluation Council
905 Plum Street SE
PO Box 43172
Olympia, WA 98504-3172
(360) 956-2047

RE: Comments on Scope of Environmental Impact Statement
Whistling Ridge Wind Power Project

Dear Mr. Fiksdal:

Counsel for the Environment (CFE) appreciates this opportunity to comment on the scoping of the Environmental Impact Statement (EIS) to be prepared for the Whistling Ridge Claim Wind Power Project (Whistling Ridge). CFE takes no position in support or opposition to the application of Whistling Ridge at this time. The following comments seek to ensure that the EIS fully captures and analyzes the proposed project's environmental impacts, and possible mitigation measures and alternatives.

Whistling Ridge is the first wind turbine farm to be sited in a forested area in the State of Washington. If approved and constructed, it will likely set a precedent for future development of wind turbine farms in forested habitat. Accordingly, the EIS should identify and carefully scrutinize all significant environmental impacts likely to result from the project, as well as all reasonable means of mitigating for, or avoiding, these impacts. Alternatives to the Whistling Ridge project and cumulative impacts should also be fully explored.

CFE believes that the EIS, at a minimum, should analyze construction and operation impacts to, or arising from, the following:

1. Rare and endangered plant species.
2. Avian species and avian habitat, including endangered and threatened species and species of concern.
3. Bats and bat habitat.

4. Wildlife and wildlife habitat, including endangered and threatened species, and species of concern.
5. Fish and aquatic habitat, including endangered and threatened species and species of concern.
6. Wetlands.
7. Surface water.
8. Ground water.
9. Air quality.
10. Noise.
11. Wildfire.
12. Traffic.

Thank you for the opportunity to comment on the scoping of the Whistling Ridge EIS. If you have any questions regarding these comments, please give me a call at (360) 586-[redacted]

Sincerely,

H. BRUCE MARVIN
Counsel for the Environment
Assistant Attorney General

HBM:cv

Cc: Linda Dalton, Senior Assistant Attorney General
Christina Buesch, Senior Counsel
Nathan Baker, Friends of the Columbia Gorge
Rick Aramburu, SOSA
Andrew M. Montano, BPA

Scoping Comment #331

Bhavnani, Monica (CTED)

From: Fiksdal, Allen (CTED)
Sent: Tuesday, May 19, 2009 8:09 AM
To: Bhavnani, Monica (CTED); Talburt, Tammy (CTED)
Subject: FW: Comments on Whistling Ridge Energy EIS Scoping and Land Use Consistency

Allen Fiksdal
Washington State
Energy Facility Site Evaluation Council
PO Box 43172
Olympia, WA 98504-3172
Phone: 360-956-2152
Fax: 360-956-2158
Visit the EFSEC web site at: http://efsec.wa.gov/

From: Loreley Drach [mailto:[redacted]@gorge.net]
Sent: Monday, May 18, 2009 2:36 PM
To: Fiksdal, Allen (CTED); CTED EFSEC
Subject: Comments on Whistling Ridge Energy EIS Scoping and Land Use Consistency

Comments submitted to Washington State EFSEC concerning the Whistling Ridge Energy Project EIS Scoping and Land Use Consistency.

May 18, 2009

Loreley Drach
[redacted]
Underwood, WA 98651

Dear EFSEC,

I am very concerned about potential conclusions from an EIS where the fundamental data derived for analysis is prepared by the applicant. I have concerns that too much temptation exists to create data which favors a specific outcome.

I would also like to address the following topics:

EIS Scoping Comments:

Bald Eagle: This information needs to be included in great detail. Area has over wintering and year round population of Bald Eagles. Nesting sites, roosting sites, feeding sites and movement between the three sites need to be thoroughly addressed in relation to the proposed project. Migratory routes need to be addressed. Assessment should include the potential future lost recruitment from the loss of each adult.

Bat Survey: Bats are present in the area as early as March. We see bats frequently between the months of March and late September feeding in the perennial creek and around the forest fringes of our property. (Our property sits 2500 feet from the proposed project's southern area border.) The bat surveys should include the entire season for bat activity in the area (not just July-Sept). Also, particular emphasis should be placed on using methods that can positively identify the Townsends Big Eared Bat, a sensitive species residing in the nearby Lava Beds and reported to inhabit the White Salmon and Little White Salmon River valleys. More information needs to be known on the numbers, distribution, movement and status of this species prior to introducing a potentially significant cause of mortality into an important breeding area.

Other Birds: All other birds of prey, migrating songbirds, and important candidate and sensitive species such as the Pileated Woodpecker need to be identified and the immediate and long term impacts on each species addressed.

Deer and Elk Over Wintering Range: Impacts on the migratory routes and over wintering range of wildlife needs to be addressed. The 1977 Skamania County Comprehensive Plan, page 75, graphically identifies heavy winter concentrations of wildlife to either side of the proposed project area.

Water Resources: The applicant omits the existence of a Perennial Stream in the immediate proximity to the A-Array in their maps. A DNR Forest Practices Application (FPA #2704293), submitted by SDS Lumber, the project applicant, clearly identifies this stream as adjacent to the project. (NP stands for Non-fish, Perennial) All streams in the proximity to the project need to be clearly identified and related impacts included in the EIS assesment.

Owl Survey: I have reviewed the preliminary application and find it very concerning the absence of owl responses. The area of the perennial stream mentioned above and not identified in the application contains significant owl habitat and needs to be included in the survey. Our suggestion is that all further EIS work needs to include extensive <u>independently</u> conducted owl surveys in this area beginning immediately.

Geologically Unstable areas: The proposed project site contains unstable slopes. These need to be addressed in greater detail than identified in the application.

Scenic Impacts Visuals: Need to be performed to the USFS recommendations for assessment of NSA scenic impacts by qualified landscape architect. The application photo simulations were completely inadequate as were the assessment stated in the text.
Furthermore, even the best still images can not communicate the visual dominance that rotating Turbine blades have on the scenic viewsheds, regardless of their proximity to the National Scenic Area.

Economic Impacts: Needs to address the long term economic impacts of degrading the outstanding scenic views. Comparable information from other sites such as World Heritage and National Parks of outstanding geology and low development indexes need to be included with National Scenic Area analysis. Economic Impact needs to address the long term implications, for example, when the novelty of wind turbines has dissipated and they are viewed as massive industrial energy complexes.

Maps: General area maps are not placed or scaled properly. Maps on land use are in many cases absolutely incorrect. These need to be corrected.

Impacts on Human Health and Well Being: The project is proposed in complex topography and this factor needs to be included in any sound propagation modeling. Maximum sound levels (ie worst case scenarios) need to be modeled and reported honestly. The dBC range should be included. The latest

information from qualified independent Medical Doctors and Researchers and Acoustical Engineers should be incorporated into study design and analysis. The applicant's preliminary report on Sound appears to use a rudimentary logarithmic decay model for sound attenuation based on standardized or idealized assumptions. Due to the complex topography and the proximity of non-participating landowners living in low-pressure zones below the proposed Turbines, a 3-dimensional sound propogation analysis is justified. Many engineering universities would have the infrastructure and capacity to undertake the analysis.

Forestry: The information as presented by the applicant attempts to show minimal impacts to forest operations. A perfect curved hillside is depicted as an example. This scenario would result in the smallest loss of trees for future forestry operations. Unfortunately, the presented scenario is not reality on the ground. The forestry operations are on the leading edges of ridges and on more gradually sloping ground where much more significant deforestation will need to be maintained. The EIS needs to map airflow and vegetation height for each string of turbines as it relates to topography and the actual acres that will be lost from forestry.

Land Use Consistency Comments:

Land use: The Applicant makes erroneous and contradictory assertions about the current and "proposed" land use. The Applicant should be required to completely redo the land use portion and depict it in a consistent and correct manner. As the application stands, the land use portion is filled with inaccuracies and misrepresentations. The impacts of this project as it relates to land use cannot be adequately assessed by anyone if only based on the information contained within the proponent's application material. Just a few examples:

Asserts: *2.1.4. Pursuant to the locally adopted land use plans and ordinances in effect at the time of this application.... three to four turbines would be located on property zoned Residential 10...*
Actual: Turbines A1-A7 are all located in For/Ag20 zone in the current zoning. This language may have been included when the applicant was writing and assuming the proposed zoning language would be passed.

Asserts: *2.1.4. In the current draft ordinance, the entire project area is proposed for Forest Land 20 (FL-20) zoning.*
Actual: In the current draft ordinance, nearly the entire project is in lands zoned Commercial Resource Lands (CRL-40) and the first four turbines of the A-Array, sited in the adjacent section, are zoned Residential 10 (R-10) and *"Large-Scale Wind Energy Facilities"* are not allowed in residential zones, period. This assertion also contradicts the assertion below.

Asserts: Appendix E. *In the proposed Title 21 zoning the Project would be entirely on lands proposed for inclusion in a new Commercial Resource Lands (CRL 40) zone.*
Actual: In the proposed zoning, the Project would NOT be *entirely* on lands proposed for inclusion in Commercial Resource Lands (CRL-40). A portion of the project is also proposed in a Residential zone where such a facility (or portion thereof) cannot, by any stretch of the imagination, be sited! The proposed zoning states a half mile setback to residentially zoned lands. If a closer setback were allowed, turbines could NOT be any nearer than the height of the turbine plus 50 ft to a residential zone. This requirement removes the A-Array completely. The maps do not display this requirement of the proposed zoning.

Thank you for the consideration of my comments.

Loreley Drach