



KLICKITAT COUNTY PLANNING DEPARTMENT

228 W. Main St., MS:-CH-17, Goldendale, Washington 98620
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MEMORANDUM

MITIGATED DETERMINATION OF NON-SIGNIFICANCE Re-issuance of SEP2020-21

Under Canvas Columbia River Gorge Project

Date:	December 25, 2020
To:	Klickitat County: Board of Commissioners, Assessor, Building, Engineer, Environmental Health, Weed Control, and Prosecuting Attorney Rural Fire District #3 White Salmon Valley School District Public Utility District (Water/Waste & Engineering) Washington State Department of Transportation (Vancouver & Goldendale) Washington State Department of Ecology (Yakima Office and SEPA Register, electronic copy) Washington State Department of Fish & Wildlife Washington State Department of Natural Resources Washington State Office of Drinking Water Washington State Dept. of Archaeological & Historical Preservation Yakama Indian Nation Bureau of Indian Affairs United States Forest Service US Army Corps of Engineers Husum BZ Community Council Interested Parties
From:	Lori Anderson, Associate Planner Klickitat County Planning Department
File No:	SEPA Review: SEP2020-21 Conditional Use Permit: CUP2020-13 Recreation Park Permit: RV2020-01 Binding Site Plan Application: BSP2020-03

Applicant:	Under Canvas, Inc. Caitlan Cullen, Manager of Real Estate 1172 Happy Ln Belgrade, MT 59714
Tax Parcel(s):	Portions of 04-10-1200-0023/01 and 04-10-1200-0023/00
Location:	Located between Husum and BZ Corner, east of State Hwy 141 and east of the White Salmon River, the proposed project will be sited within Section 12, T4N, R10E and Section 7, T4N, R11E. The site would be accessed via Oak Ridge Road, a county road, and private easements across adjacent parcels.
Zoning Designation:	Resource Lands
Lead Agency:	Klickitat County Planning Department 228 West Main, MS-CH-17 Goldendale, WA 98620
Materials enclosed for review:	Updated SEPA Checklist with Appendixes, Updated Applications and other materials. These documents are available online at http://klickitatcounty.org/1261/Under-Canvas
Publish:	January 6, 2021
Comment Deadline:	January 22, 2021
Appeal Deadline:	January 22, 2021

I. BACKGROUND INFORMATION

A Preliminary Mitigated Determination of Non-Significance (PMDNS) was issued on August 27, 2020 for the Under Canvas Columbia River Gorge Project (Proposal). The PMDNS was withdrawn on October 20, 2020 to allow time for the Applicant to address comments received. The Applicant submitted revised/updated applications, SEPA checklist and special reports during the months of November and December 2020. Environmental impacts of the Proposal are further evaluated/clarified, and SEP2020-21 is re-issued as a Mitigated Determination of Non-Significance (MDNS). Information is on file with the Planning Department or available online at <http://klickitatcounty.org/1261/Under-Canvas>

II. Checklist:

The Environmental Checklist was submitted to the Planning Department in August 2020 with the Conditional Use Permit Application, Recreation Park Permit Application and the Binding Site Plan Application. A Revised Checklist was resubmitted on November 13, 2020, which supersedes the previously submitted checklist. The Revised Checklist was determined to be substantially complete on December 15, 2020.

III. DESCRIPTION OF PROPOSAL

Under Canvas, Inc. is a private company that develops and operates outdoor luxury camping ("glamping") camp sites. Under Canvas has acquired an interest in an approximately 119-acre of land in Husum. The proposed Under Canvas Columbia River Gorge Project proposes to maintain and manage the majority of the tract for long term forestry use in accordance with the Forest Management Plan (Washington Forestry Consultants, Inc, March 2020). The remainder portion will be withdrawn from the current use taxation classification and dedicated to improvements for development. A Class IV-General Forest Practice Application will be obtained from WA State Department of Natural Resources to convert approximately 27 acres to non-forestry use.

The Project is to provide a seasonally operated, 95-tent luxury camping facility with individual canvas tents for sleeping quarters. Camping would be offered April through October (weather dependent). The tents would be a mix of standard safari-style structures using shared restroom facilities placed throughout the site and deluxe tents with en suite bathrooms. Tents would be equipped with wood-burning stoves for heat designed for use in such facilities, complete with spark arrestors and heat shields. No smoking, campfires, food, or cooking facilities would be permitted at individual tent locations. Guest tents would be supported by a central lobby including kitchen and dining area for guests as well as additional guest amenities. Guest tents may be taken down at the end of the season and placed into on-site storage, while the lobby tent would remain year-round. Maximum build-out of 95 guest tents is anticipated to be completed within 5 years of construction start.

The facilities to be included in the project include the following:

- 95 guest tents.
- Two communal bathroom facilities comprised of three or six bathroom units placed approximately 250 feet from tents without bathrooms.
- One lobby/check in tent adjacent to the commercial kitchen trailers that would provide food service with an approximate 4,500 sq. foot pad and 3,200 sq. foot interior.
- One tent for guest gatherings and sanctuary tents for spa services.
- Single service meals would be prepared and served onsite from the commercial kitchen and would only be offered to guests staying at the camp.
- Space for on-site activities such as volleyball, horseshoe pit, yoga deck and event platform.
- Americans with Disabilities Act (ADA) accessible parking spaces, camping tents and bathroom facilities.
- Two communal fire pits, started, maintained, monitored and extinguished by trained Under Canvas staff at all times.
- One laundry/housekeeping staging area for staffs use; along with staff and storage tents.
- Approximately 125 graveled parking spaces.
- On site fencing as needed.
- Signage for camp locations and emergency access.

Golf carts operated by Under Canvas staff are used for staff circulation around the site. Circulation throughout the site would consist of a new vehicular entrance road accessing the main lobby and pedestrian/cart paths providing access to tents. Existing gravel and native surface logging roads within the property would be used for vehicular access. There would be no artificial landscaping, and on-site grading is minimized by fencing and controlled access.

Individual guest tents would not be wired for electricity, but the main lobby tent and the back-of-house facilities would be; solar lighting would be used along pedestrian and cart paths. Electrical is readily available in the adjacent right of way. Water would be provided to the project area via an on-site public water supply well, and sewer would be accommodated in a new on-site septic system.

IV. DOCUMENTS SUBMITTED WITH THIS APPLICATION

- Critical Areas Report and Impact Analysis dated June 2020 prepared by ESA
- Cultural Resource Report dated June 2020 prepared by ESA
- Updated Traffic Access and Impact Study Memorandum dated December 10, 2020 prepared by DKS Associates
- Wildfire Mitigation Plan dated June 25, 2020 prepared by Washington Forestry Consultants, Inc.
- Forest Management Plan dated March 17, 2020 prepared by Washington Forestry Consultants, Inc.
- Geotechnical and Geological Feasibility Assessment 1st Phase dated April 22, 2020; Updates and Clarification to Options Identified in April 2020 for Potable Water Assessment and Water Source Approval dated November 2020, by Aspect Consulting
- Under Canvas "Typical Structures" Plan Set prepared by Under Canvas
- Stormwater Management Requirements Memorandum prepared by ESA dated March 18, 2020
- Preliminary Feasibility Study for an On-site Wastewater System dated May 21, 2020 prepared by Ever Green Septic Design, Inc

Application materials including the documents listed above (with the exception of the cultural resources report) can be reviewed on the Klickitat County Planning Department website <http://klickitatcounty.org/272/Planning-Department> or can otherwise be obtained by contacting the Planning Department at (509) 773-5703 or planning@klickitatcounty.org.

V. APPLICATION REVIEW

The project as proposed requires a conditional use permit, a recreation park permit and an associated binding site plan. Conditional uses listed in the resource lands district including "Parks, playgrounds, golf courses, country clubs, riding academies and stables, camping clubs, recreational and conservation clubs, ski resorts, private clubs, lodges, convents or community centers"; "Bed-and-breakfast room rentals by the resident owner for temporary lodging purposes only"; and "Any other uses judged by the board of adjustment to be consistent with the purposes and intent of this chapter and to be no more detrimental to the adjacent properties than, and of the same type and character as, the above listed uses." A recreation park is defined as any tract of land that is divided into rental spaces under common ownership or management for the purpose of temporarily localing tents for recreational purposes. A

public hearing on the conditional use permit application will be scheduled after the environmental review is completed. The date of the public hearing will be published in the local newspapers.

Staff incorporated the entire 119-acre parcel into the SEPA review, which is intended to determine if the Proposal would result in significant adverse impacts to both the natural and built environments. Approximately 27 acres are designated as the development area and the rest of the 92 acres will remain in forestry. The designated development area is located outside the Wild and Scenic River Corridor and no work is proposed within 700 feet of the White Salmon River.

The conditional use permit application, recreation park application and associated binding site plan application as submitted with the SEPA checklist will address the proposed development with the maximum 5-year build-out period dependent upon securing the proper approval from the WA State Department of Health for a public water system. The total number of connections the public water system can support will be determined through the constructed facility and water right. It is the responsibility of the applicant to contact Washington State Department of Ecology to verify the status of water right requirements and to obtain proper permitting.

The application was sent to Public Works and Washington State Department of Transportation (WSDOT) for review during the Preliminary MDNS process. No comment was received from WSDOT. A Traffic Impact and Access Study (October 29, 2020, updated December 10, 2020) was provided to the County for review. Public Works made recommendations on safety mitigation to the impacts from the increased traffic as a result of the Proposal. These mitigation measures are incorporated herein. Public Works also provided comments on transportation standards, drainage, erosion and stormwater management.

The underlying zoning is Resource Lands. Land use and the required performance standards for the Proposal will be addressed through the conditional use permitting process.

VI. TESTIMONY

The following adjacent property owners/parties of interest submitted comments.

Richard Allen: Email dated September 16, 2020
Brian Anderson: Email dated September 17, 2020
David P. Anderson: Email dated September 18, 2020
Jan Aszman: Email dated September 16, 2020
Sheri Bousquet: Emails dated September 14, 16 and 18, 2020
Justin Bousquet: Email dated September 18, 2020
Eric Breon: Email dated September 11, 2020
Rick Bruner: Email dated September 16, 2020
Thomas Butler: Email dated September 17, 2020
Columbia Gorge Audubon Society: Letter received on September 14, 2020 and email received on September 18, 2020
Robert Connor: Email dated September 17, 2020
Rich and Julie Davis: Email dated September 18, 2020
James Day: Email dated September 16, 2020
Kate Drahota: Email received September 19, 2020

Debra Draper: Email dated September 17, 2020
Steve Erickson: Email dated September 16, 2020
Erik Estrem: Email dated September 17, 2020
John Farnum and Alexa Pengelly (Oak Ridge Vineyard): Email dated September 15, 2020
Adam Filippino: Email dated September 7, 2020
Friends of the Columbia Gorge: Email dated September 18, 2020
Friends of Oak Ridge represented by Crag Law Center: Email dated September 18, 2020
Friends of the White Salmon River: Email dated September 18, 2020
Donna Fristoe: Email dated September 16, 2020
Mary-Taylor and Bill Goforth: Email dated September 18, 2020
Fred Greef: Email dated September 16, 2020
Bryce Guske: Email dated September 16, 2020
Karen Hadley: Email dated September 18, 2020
Prescott Harvey: Email dated September 17, 2020
Shae Hill: Email dated September 10, 2020
Ward Jagels: Email dated September 17, 2020
Cory Jubitz: Email dated September 17, 2020
Klickitat County Land Preservation Fund represented by Bryan Telegin: Email dated September 18, 2020
Kim Kovalik: Email dated September 18, 2020
Colleen Kraus: Emails dated September 18, 2020
Kelly Larson: Email dated September 17, 2020
Greg Mallory: Email dated September 17, 2020
Nancy Maurer: Email dated September 16, 2020
Kevin Molitor: Email dated September 18, 2020
J. S. Morrow: Email dated September 11, 2020 and Letters received on December 7 and 16, 2020
Jan Muir: Email dated September 17, 2020
Ehan Myburgh: Email dated September 18, 2020
Alisha Nightingale: Email dated September 18, 2020
Lee Phares: Email dated September 18, 2020
Janice Reid: Email dated September 16, 2020
P and R Roos: Email dated September 15, 2020
Carol Solbach: Email dated September 17, 2020
Steve Stampfli: Emails dated September 17 and 18, 2020
Dennis and Bonnie White: Email dated September 18, 2020
Chris and Gretchen Wiggins (RubyJune Inn): Email dated September 2, 2020
Eric Wilson: Email dated September 18, 2020
Thomas and Marlene Woodward: Email dated September 16, 2020
Steven Woolpert: Email dated September 18, 2020
Yakama Nation: Email dated September 18, 2020

Agencies Comments/Response:

WA State Department of Archaeology and Historic Preservation: Letter dated July 14, 2020
WA State Department of Fish and Wildlife: Email dated September 9, 2020
WA State Department of Ecology: Email dated September 16, 2020
WA State Department of Natural Resources: Email dated September 18, 2020
Klickitat County Environmental Health: Emails received September 2 and October 12, 2020

Klickitat County Public Works: Emails dated September 21, December 2 and December 15, 2020
Klickitat County Fire District 3: Email dated September 18, 2020

VII. THRESHOLD DETERMINATION

Klickitat County has determined that the Proposal, conducted in conformance with the applicable Klickitat County Codes and Ordinances, would not have a probable significant adverse impact on the environment, and an environmental impact statement is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the Klickitat County Planning Department.

Consistent with the provisions of the Klickitat County Comprehensive Plan and Regulations, the following mitigation measures are required for this project:

1. Any additional permits shall be secured from federal, state, or local permitting agencies prior to implementation of the proposal.
2. The project shall maintain compliance with the Klickitat County Critical Areas Ordinance.
3. The perimeter of the property shall be posted so as to inform participants that entry onto surrounding properties constitutes trespass if the adjacent landowners have not granted approval for entry.
4. A Construction Stormwater General Permit shall be secured from WA Department of Ecology (DOE) prior to starting ground disturbance activities. The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.
5. A Stormwater Plan prepared by an engineer licensed in the State of Washington shall be submitted for County review and acceptance prior to construction of the project. The Plan shall be in compliance with the DOE's Stormwater Management Manual for Eastern Washington.
6. The applicant shall utilize Best Managements Practices (BMPs) found in the DOE's Stormwater Management Manual for Eastern Washington to prevent sediment laden runoff from leaving the construction site and flowing onto adjacent properties during grading and construction activities.
7. Clearing limits, easements, or required buffers should be staked and flagged in the field prior to construction activities. Source control BMP such as plastic covering, mulch, temporary seeding, and phased clearing should be used to control erosion during construction.
8. Construction vehicles shall be monitored for petroleum leaks. Spills shall be cleaned up immediately.
9. The Washington State Department of Ecology determined that all of the uses within the Proposal would be for commercial/industrial purposes and would only be allowed the 5,000 gallons per day under the industrial portion of the groundwater exempt uses. If the project cannot limit the use to 5,000 gallons per day or less, the applicant shall contact Washington State Department of Ecology to verify status of water right requirements and to obtain proper permitting.
10. All water provided to the participants must come from a public water source that meets

WAC 246-290. Permits from the Washington State Department of Health are required for public drinking water systems. The total number of connections the public water system can support will be determined through the constructed facilities and water rights. Trucked water is not considered a reliable source of water supply and shall not replace and/or take the place of a permanent source.

11. The Klickitat County Department of Environmental Health reviewed the Preliminary Feasibility Study for an On-site Wastewater System (Every Green Septic Design, Inc., May 2020). The Applicant shall work closely with a Washington State Licensed Septic Designer and Environmental Health to continue discussion during the design and permitting phase. Best management practices shall be utilized as design parameters necessary for the protection of public health and groundwater quality.
12. Food Services shall comply with all current Klickitat County Environmental Health regulations.
13. To minimize noise impacts, construction activities will be limited to daylight hours and all equipment will have sound-control devices. Noise levels shall not exceed those levels established by the Washington State Department of Ecology under WAC 173-60.
14. A commercial road approach permit and construction is required at the entrance to the proposed project.
15. No event parking will be allowed on Oak Ridge Road.
16. The Applicant shall follow recommendations from Klickitat County Public Works to provide adequate provision for access to the site. Roads serving the project shall meet AASHTO or Washington State Department of Transportation (WSDOT) standards for a fire truck.
17. All roads that are accessing the facility shall meet the Klickitat County Title 12 standards for a fire access road.
 - a. The "Fire Access Road Standards" of Title 12 being within a 60 ft wide easement and shall have a running surface that is no less than 20 feet in width.
 - b. The Fire Access Road shall be constructed with a minimum of 0.75 ft compacted thickness of "Base Course" (1-1/4" minus crushed rock) or "Pit Run" with 0.25 ft compacted thickness of "Top Course" (5/8" minus crushed rock) placed as the wearing surface.
 - c. If roads are modified or constructed, maximum fill slopes and ditch in-slopes shall not exceed 2 ft horizontal to 1 ft vertical (2: 1). Slopes steeper than 2: 1 are not allowed.
18. All roads not accessing the facility shall be closed off via gate, bollard, etc. due to fire danger on roads that are not being brought up to the fire access road standard. Cross-Sections for the roads and cart paths are required to be submitted for review by Public Works.
19. The facility shall be designed to meet standards set by the Americans with Disability Act (ADA). A scaled detail or detail with measurements of the parking area/s with aisles, width stalls, designated ADA stalls, and direction of flow shall be submitted for review.
 - a. The surface of the ADA access shall be a stable, firm and slip resistant hard surface (like cement or asphalt; crushed gravel is not considered to be a stable, firm surface).
 - b. Designated ADA parking spaces should be located nearest the destination point, such as restrooms and facility entrances and provide a hard surface path to the facility following the width requirements.
 - c. The number of accessible parking spaces shall be provided according to the number of total spaces (example for every 25 spaces 1 ADA space is required up

to 100 spaces). ADA parking space layout standards are shown on Standard Plan M-17. I 0-02.

20. Due to fire danger of parking on vegetation during dry conditions, the parking lot is required to have a minimum 6" gravel surface if permitted from May to October. If outside the May to October window, the parking area will be required to have a total of 12" gravel surface. 6" of gravel is required for the project, but 12" is advised for muddy conditions during Spring.
21. Consult with WA State Department of Fish & Wildlife to determine if the existing culverts are sized correctly for the stream and if they are adequate to support the proposed roads and cart paths.
22. Specific measures to reduce traffic impacts during the construction process shall be used. Measures will include signage, notifying local residents of the work, and compliance with any requirements of the Klickitat County Public Works and/or WSDOT.
23. Oak Ridge Road is on the County's safety plan to upgrade the current signage. The paved sections of the road are scheduled to be upgraded. The gravel section of Oak Ridge Road is not scheduled to have the existing signage upgraded to meet the current Manual on Uniform Traffic Control Devices (MUTCD). The gravel section of Oak Ridge Road was left out due to low traffic volumes. According to the traffic impact analysis, the Proposal will generate 210 ADT through the gravel section of Oak Ridge Road. Since the proposal will increase the traffic on the gravel section of Oak Ridge Road, the Applicant is required to have a licensed engineer in the State of Washington who specializes in traffic engineering prepare a permanent signage plan related to curve and other warning signs for the gravel section of Oak Ridge Road. The plan shall be submitted and approved by Public Works prior to issuance of building permits.
24. The Applicant shall apply for and receive a work within the right-of-way permit from Public Works to install new signs per the approved signage plan. The signs shall be installed prior to the applicant receiving an operational permit for the recreation park.
25. A vegetation management plan shall be created to help preserve the road as well as mitigate for fire dangers.
26. The Applicant shall maintain any offsite drainage that flows through the project site.
27. The Applicant shall implement applicable measures as detailed in the Wildfire Mitigation Plan (Washington Forestry Consultants, Inc. June 2020) to reduce wildfire risk.
28. Burn ban restrictions shall be observed. Outdoor burning of any type is not allowed during burn ban within Klickitat County Burn Ban Zone Three (3). When burn ban is in effect, warning signs shall be posted alerting guests of the ban.
29. The applicant shall also develop a firefighting plan with Klickitat County Fire District #3. The plan should include an assessment of the fire district's capabilities to respond to fire emergencies. The Department of Natural Resources should also be consulted as a potential responder.
30. Provide an evacuation plan in case of an emergency that anticipates the need to evacuate guests quickly.
31. Have fire extinguishers and other fire suppression equipment/emergency medical equipment such as an automated external defibrillator (AED) onsite and readily available for use.
32. The Applicant shall follow recommendations in the Critical Areas Assessment Report in order to minimize potential impacts to the identified critical areas in the project study area.
33. Prior to commencement of any land disturbing activities, a western gray squirrel nests survey shall be conducted by a qualified professionals. A copy of the survey shall be

- provided to the Planning Department.
34. The Washington State Department of Fish and Wildlife (WDFW) reviewed the proposal and recommended the followings to reduce impacts to western gray squirrels:
 - a. Avoidance and minimization of logging, road building or other noisy activities within 400 feet of all nest trees from March 1 through August 31.
 - b. During active logging operations:
 - i. Retain all nests trees identified under an active Forest Practice Application (FPA)
 - ii. When possible maintain a 50-ft radius of "no cut" buffer around each nest tree.
 - iii. When possible maintain a 50% canopy cover between trees
 - iv. When possible maintain arboreal "stringers" of trees to water and foraging habitat.
 - c. The applicant shall continue to consult with WDFW on any future logging and incorporate oak release harvesting options to improve oak habitat.
 35. A Cultural Resources Assessment was prepared by ESA. No significant cultural resources were found. Potential for an inadvertent discovery may occur during project implementation, if any previously unidentified cultural resource properties are encountered during construction, cease all construction and ground disturbing activities in the immediate vicinity of the cultural resource site pending evaluation by a qualified archaeologist in consultation with the Yakama Indian Nation and State Department of Archaeology and Historic Preservation to identify appropriate mitigation measures such as avoidance or scientific data recovery.
 36. Temporarily disturbed areas will be re-vegetated with an appropriate seed mix consisting of native shrubs, forbs, and grasses.
 37. Follow all protocols as developed by the Washington State Invasive Species Council for invasive plants and noxious weeds.
 38. The applicant shall comply with the Washington State Department of Ecology air quality requirements for air emissions.
 39. Watering or other dust-abatement measures will be used as needed to control fugitive dust generated and minimize wind erosion during construction. A water truck shall be maintained on site during construction.
 40. Structures, existing and proposed, shall comply with all applicable code requirements, including fire separation setbacks, as prescribed by the Washington State Building Code, RCW 19.27. Structures may be subject to a geotechnical analysis and/or engineered foundation, as site conditions warrant. Structures on fill shall require a compaction report, and may need further analysis by a geotechnical engineer.
 41. External lighting shall be directed away from adjacent properties and shall be shielded or downcast.
 42. The Washington State Department of Natural Resources (DNR) noted that the proposal will require an approved Forest Practices Application/Notification (FPA) prior to conducting any conversion activities (as defined in WAC 222-16-010) of portions of timber lands to non-forestry uses.
 43. The Washington State Department of Natural Resources (DNR) noted that an approved Class IV FPA is not required for implementation of a Forest Management Plan for the portions remain in timber lands. However, the Applicant shall consult with DNR to determine if additional non-conversion FPAs are required to implement aspects of the Forest Management Plan.

VIII. COMMENTS AND APPEALS

Written comments must be submitted to the Klickitat County Planning Department by 5 pm on Friday, January 22, 2021. Comments can be emailed to planning@klickitatcounty.org, mailed to 228 W Main Street, Goldendale, WA 98620 or dropped off at 228 W Main Street, Goldendale, WA 98620.

Per the Klickitat County Environmental Ordinance #121084, as amended, any agency or person may appeal this MDNS. Appeals must be made to the Board of County Commissioners, who would then hold a public hearing. Appeals shall state with specificity the basis for the appeal and the errors to be asserted to the Board. Appeals shall not be deemed complete without payment of the appeal fees applicable to a Class A project, payable to the Klickitat County Planning Department. Appeals must be filed with the Klickitat County Auditor by 5 pm on Friday, January 22, 2021.

Signed this 25th day of December, 2020.



Mo-chi Lindblad
Klickitat County Planning Director
SEPA Responsible Official

