

## Jeff Watson

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**From:** Jeff Watson  
**Sent:** Friday, July 12, 2013 11:47 AM  
**To:** 'Traci Shallbetter'  
**Cc:** Doc Hansen  
**Subject:** RE: Carlson Campground CUP

Ms. Shallbetter,

Community Development Services has not as of yet made a determination regarding the SEPA process for this application. I will take your request and comments into consideration as this application is processed. A Notice of Application and SEPA process notification will probably be issued some time next week. I will make certain that you are included in all correspondence.

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**From:** Traci Shallbetter [mailto:[traci@shallbetterlaw.com](mailto:traci@shallbetterlaw.com)]  
**Sent:** Friday, July 12, 2013 11:34 AM  
**To:** Jeff Watson  
**Subject:** Carlson Campground CUP

Jeff,  
I understand that you are the planner who is handling the CUP application submitted by Kris Carlson for a campground off of McNanamy Road. I represent Lee and Karen Bates, who owns Parcels 10 and 11 of Dry Fly Meadows (Parcels 169433 and 20221). By this email, we are urging the County to utilize the standard SEPA notice and comment process for the application, rather than any Optional DNS process. The potential impacts of this proposal are simply too uncertain and too great to warrant use of an Optional DNS process. The County needs to have the benefit of public comment from neighbors and agencies prior to rendering a potential threshold determination under SEPA. We are under the impression that the County has not yet sent out a threshold determination (as my clients, adjacent property owners, have yet to receive anything).

Also, we want to be sure that you are aware, at the earliest opportunity, that Carlson has only a 30 foot easement through their property (pursuant to the document recorded under Kittitas County AFN 562468) for the limited purpose of ingress, egress, and utilities. (See attached map showing location of 30 foot easement). There is a great deal of past history pertaining to Carlson's use of the easement/allowance of use of that easement by commercial guide services without a CUP, and, as will become evident in the comment process on Carlson's application, my clients have grievous concerns about the impacts and undue burden that would result to their property and adjacent properties if Carlson were permitted by the County to utilize the subject 30 foot easement for commercial purposes that would involve travel by large campers, RVs, etc. on a frequent basis.

Not only would such proposed use overburden the easement in terms of Carlson's private rights of access, but it would present public safety dangers in light of the camper and boat traffic that would be crossing the railroad tracks and passing over an unimproved 30 foot wide road through the two lots owned by the Bates. Already

there have been multiple incidents with Carlson-authorized boats/guide services coming dangerously close to hitting one of the Bates' dogs or the Bates' guests. The public safety concerns and disruption, [are](#) in addition, to the noise, dust, light/glare from the campers, cars, and traffic that would result if the County were to authorize Carlson's use of this 30 foot easement for the proposed commercial purposes involving a campground and launching area. It does not seem that it would be appropriate or legal for Carlson to utilize the 30-foot easement for his commercial purposes—particularly when considering the elements of Footnote 12 to KCC 17.15.070. We would hope that Carlson or the County would propose that Carlson utilize or create a direct access to his property from Highway 10—one that does not rely on crossing through the private property of others. (See note on attached map suggesting access route that Carlson should use/create if he intends to have a commercial campground and fishing enterprise on his property).

In addition to traffic and impacts on agricultural and residential lifestyle, exist potential, unknown, and unevaluated impacts pertaining to water quality, critical areas, wildlife habitat, fish, and natural resources. Discharges of oil and waste from boats and campers needs to be considered and evaluated, along with the general disturbance of the habitat and environment along the river and in the floodway.

It is difficult to see how the proposed project could in any way merit recommendation for a conditional use approval in light of the likely impacts, and specifically the criteria in Footnote 12 to KCC 17.15.070 which must be considered when considering location of a campground in the AG-20 area. We look forward to providing comments on the proposed environmental impacts of the proposal once the notice of application is mailed and published by the County. We also look forward to providing the County with detailed comments on the extent to which the proposed use, even if conditioned, could meet the criteria for a conditional use in the AG-20 zone. We will withhold judgment until we see the full proposal and any proposed conditions.

Jeff, by this email, I am request that you include me in the mailing of all notices on the Carlson CUP application. I also reiterate my exhortation that the County utilize the standard SEPA process for its threshold determination, rather than the Optional DNS process.

Traci Shallbetter  
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