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Mr. Andy Huddleston  
Pend Oreille County Community Development Department  
P. O. Box 5066  
Newport, Washington 99156-5066

PEND OREILLE CO.  
COMMUNITY DEVELOPMENT

Regarding: Conditional Use Permit (CUP) Application for Spokane Slavic Church Bible Camp on County parcel # 453006500003

Dear Mr. Huddleston,

We would like to thank you for the opportunity to review and comment on the Conditional Use Permit (CUP) application for the proposed Bible Camp on County parcel # 453006500003. While we generally are in support of planned local development, however, we would like to express general concern with this proposal as it exists today. As homeowners and residents in the immediate area we do not believe the proposed CUP is compatible with neighboring use in the area (as required by xx.68.010). Additionally, we believe there are a number of inaccuracies and omissions in the application that was submitted; specifically, our concerns are as follows:

1. We do not believe the proposal adequately addresses the issues of water supply and sanitary waste. We are skeptical that the project will tie into the Diamond Lake Water and Sewer system and the application does not provide details of any alternatives should that connection fail to occur. In the case of sanitary waste, section 1.b.2. of the SEPA checklist does not give specifics on where the resulting Large On-site Sewage System (LOSS) would be located nor address potential environmental impacts from such a large system, if installed. Should water supply need resolution Section 1.b.1 of the checklist does not address locations of wells, water rights, or potential impact to the water table from the high usage that this project would result in. We believe the issues of water and sanitary waste should be fully vetted prior to any CUP being issued.

2. We have various concerns surrounding the traffic and road impacts that the project would have. SEPA checklist section 14.c indicates a need for 40 vehicle parking spaces, however, the site plan does not indicate the planned location of these. We are concerned parking may not be addressed and would spill out onto the local roadways. It is clear that there will be a significant increase in vehicle traffic, while there is some uncertainty as to what extent due to the discrepancies in the number of trips identified between the project description and SEPA checklist 14.f. We believe this increase should have been indicated in SEPA checklist 14.d and should be fully evaluated in compliance with Pend Oreille County Road Standards Chapter 10. Specifically, we believe this project meets the applicability outlined in section 10.020 which states,

"Any land development which will impact the service level, safety, structural integrity, or operational efficiency of abutting or serving county roadways or is required by other county code, ordinance, resolution or permit, or is required by any other means, shall improve those roadways in accordance with the current county standards."

It is our belief that traffic impact assessment should include not only Telephone Road, but extend out to the intersections of Green Road and Telephone Road as well as Green Road and Highway 2.

Furthermore, in SEPA checklist number 14.h the mitigation measure proposed of flagmen "on the day of check in and check out of the camp" is flawed. It does not resolve the fact that Telephone Road already requires repair by the Public Works Department multiple times per year and this increase in traffic would significantly exacerbate the problem. Nor would this measure address safety concerns such as, absence of lighting along Telephone Road near the proposed project egress and the immediate proximity to a school bus stop that is used by multiple neighborhood children.

It is our opinion that all of these traffic concerns should be assessed and mitigated as part of the CUP process.

3. The proposal includes reference to RV spaces in future phases of development and therefore we believe this application should be processed per chapter xx.48A of the Pend Oreille County Development Regulations. We believe this project meets the applicability of this section as outlined in xx.48.020.A,

“Any person seeking to use real property as a “Commercial Use” for recreational vehicle parking sites that do not involve the sale, or transfer of ownership of RV parking sites shall be processed as a Recreational Vehicle Park...”

Our concern is that without being subject to this additional review process, and conditions of use that would likely result from that review, the RV use on the property could become uncontrolled and a nuisance.

4. We do not believe the application fully identifies potential aesthetic impacts from the proposed use. SEPA checklist section 7.b.2 indicates there will be no noise impact, short or long term. We are confident that there will be short-term noise during site preparation and construction. Additionally, we do not agree that there will be no long-term noise impacts. There is a likelihood that activities at the camp will be heard on neighboring properties, especially in the applicants pursue special events (such as weddings) as indicated in the application. As a result we believe that SEPA checklist 7.b.3 should include noise controls as should a CUP, if issued. We also question the accuracy of checklist 11.a, which indicates no impact from light although yard lights will be installed. Without specifying the number, strength, and location of these lights that determination cannot be made. For example, should the applicant choose to light the sport field for night activities, it would likely have an impact on the immediate area and should require conditions of use.

5. Our last concern is the general lack of thoroughness given to a number of other elements on the SEPA checklist. These include:

- a. Section B.1.e doesn't not include reference to grading, which will likely occur during construction of both the building area and roads.
- b. In question 1.c there is mention of a water runoff pond, but no indication on the site map.
- c. Wildlife listed in B.5.a is grossly incomplete. Indicating only elk and deer, this complete overlooks birds (such as, bald eagles, woodpeckers, song birds, water fowl, etc.) and other mammals (moose, squirrels, coyote, raccoon, cougar, etc.) found in the area.

In summary, it is our belief that this application does not adequately address a number of impacts that the project would have on the local neighborhood and the lack of detail in the application causes us to question if implementation of the project would result in a similar lack of compliance. For these reasons, we ask that you deny the CUP. At a minimum, we request that you evaluate and address the issues we have identified and mitigate the impacts to our neighborhood. Again, thank you for your time and consideration of our concerns.

Regards,



Mr. and Mrs. Jonathan Verity  
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