

TERRAPINS OWNER LLC

Skamania Lodge
1131 SW Skamania Lodge Way
Stevenson, Washington 98648

Via Email and Hand Delivery

February 24, 2026

Planning Commission
City of Stevenson
7121 E. Loop Road
Stevenson, WA 98648
planning@ci.stevenson.wa.us

Re: **Objection to Conditional Use Permit CUP-2025-003**
365 SW Foster Creek Road – Proposed Primitive Campground
Applicant: Wesley Huston

Dear Chair Breckel and Members of the Planning Commission:

Terrapins Owner LLC (“Skamania Lodge”) respectfully submits this formal **objection** to Conditional Use Permit Application CUP-2025-003, which seeks approval to establish seventeen (17) overnight primitive campsites on approximately 3.2 acres of Suburban Residential (“SR”) zoned property at 365 SW Foster Creek Road. Skamania Lodge directly abuts the subject property. The proposed campground would operate immediately adjacent to Skamania Lodge property lines and near guest accommodations and operational facilities. After reviewing the application materials and public notice, Skamania Lodge urges the Planning Commission to deny the application. This letter will show you that:

- Campground use is not consistent with the purpose of the SR zone;
- The proposed use is incompatible with surrounding uses;
- The application fails to demonstrate that the use will not be detrimental to adjacent properties;
- The proposed use raises public health, sanitation and safety concerns;
- Approving this would be inconsistent with ongoing city policy discussions regarding transient uses;
- Approving this would constitute a precedent threatening zoning integrity; and required findings necessary to approve this application are absent.

I. Threshold Issue: A Campground Use Is Not Consistent with the Purpose of the SR Zone

The SR zoning designation is intended to preserve and protect suburban residential character. A 17-site transient campground constitutes a commercial lodging use of material intensity. Even if framed as “primitive” or “seasonal,” the use involves:

- Transient overnight occupancy.
- Vehicular camping.
- Commercial activity associated with a business.
- Regular turnover of visitors.
- Concentrated use on a 3.2-acre parcel.

Seventeen sites equate to a density exceeding five sites per acre. That is not incidental to nursery use; it is a standalone recreational lodging operation. The Commission must first determine whether a campground is even contemplated as a conditional use in the SR zone under CS 17.39.020. If not expressly permitted as a conditional use, the application cannot be approved through the CUP process. A variance cannot be used to authorize a use not otherwise allowed in the zone.

II. The Proposed Use Is Incompatible with Surrounding Uses

The CUP criteria require that the proposed use be compatible with surrounding properties and not materially detrimental to adjacent uses. Skamania Lodge is a destination resort operating under Commercial Recreation zoning with significant infrastructure investment, guest expectations, and regulatory compliance obligations. The proposed campground:

- Provides no restroom facilities.
- Provides no sanitary dump station.
- Provides no water or wastewater plan.
- Includes no on-site management plan.
- Includes no noise control standards.
- Includes no lighting or buffering plan.
- Includes no fire mitigation plan.
- Includes no occupancy limits per site.

While characterized as “pack-in, pack-out,” the application provides no enforceable mechanism to ensure compliance. The Skamania Lodge’s guests expect a managed, professionally operated environment. The introduction of an unmanaged transient campground immediately adjacent to Lodge property creates material compatibility concerns, including noise, fire risk, late-night activity, lighting impacts, and potential sanitation issues. The applicant’s assertion that the use “complements” the Lodge is

unsupported by analysis or evidence and is a fallacy. Additionally, Skamania Lodge is the largest provider of transient lodging taxes.

III. The Application Fails to Demonstrate That the Use Will Not Be Detrimental

The CUP standards require affirmative findings that the use will not:

- Be materially detrimental to adjacent properties.
- Create public health or safety concerns.
- Generate excessive traffic or nuisance conditions.

The record contains no:

- Traffic impact analysis.
- Fire protection assessment.
- Stormwater or critical areas report.
- Geotechnical review.
- Operational management plan.

Seventeen campsites could generate 17–34 vehicles at peak occupancy, with unknown guest numbers per site. Foster Creek Road is not designed as a campground access corridor.

The burden rests on the applicant to demonstrate compliance. Assertions are not evidence.

IV. Public Health, Sanitation, and Fire Safety Concerns

The proposal relies entirely on self-contained vehicles and voluntary compliance with “pack-in, pack-out” waste handling. There is no:

- On-site restroom facility,
- Greywater containment system,
- Monitoring plan,
- Enforcement protocol,
- Solid waste plan.

Additionally, the application is silent on:

- Open flame policies,
- Fire pit restrictions,
- Burn bans,
- Emergency vehicle access and turnaround.

In a community with known wildfire sensitivity, approving 17 transient campsites without a detailed fire mitigation plan would be inconsistent with public safety obligations.

V. Inconsistency with Ongoing City Policy Discussions Regarding Transient Uses

The Planning Commission has recently discussed regulation of short-term rentals in residential zones and acknowledged that such uses are commercial in nature. Approving 17 transient lodging sites in SR zoning would materially expand commercial overnight lodging in residential areas without the regulatory safeguards imposed on hotels, licensed lodging facilities, or even short-term rentals. The Commission must apply standards consistently.

VI. Precedent and Zoning Integrity

Approval of this application would establish precedent that large-scale overnight commercial recreation uses may be introduced into SR zones without infrastructure, buffering, or management requirements.

That would significantly blur the distinction between Suburban Residential and Commercial Recreation zones and undermine the predictability of the City's land use framework. Zoning distinctions exist for a reason. The applicant has not demonstrated why this parcel warrants departure from those principles.

VII. Failure of Required Findings

To approve the CUP, the Commission must make specific written findings supported by substantial evidence. Based on the current record, the Commission cannot reasonably find that:

- The use is compatible with surrounding properties.
- The use will not be materially detrimental.
- Adequate provisions exist for sanitation and fire safety.
- The use is consistent with the purpose of the SR zone.
- The proposal will not adversely affect adjacent commercial operations.

Absent substantial evidence, denial is legally appropriate.

VIII. Conclusion

Skamania Lodge respectfully requests that the Planning Commission deny CUP-2025-003. Should the Commission elect to continue review rather than deny, at minimum the applicant should be required to provide:

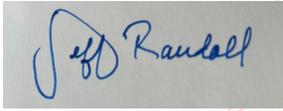
- Detailed operations and management plan.
- Traffic impact analysis.
- Fire protection and wildfire mitigation plan.
- Sanitation and waste disposal plan.
- Critical areas and geotechnical review.

- Buffering and lighting analysis.

Without such documentation, the application does not meet the standards required for conditional use approval.

Thank you for your consideration.

Respectfully submitted,



Digitally signed by Jeff
Randall
Date: 2026.02.24 08:41:18
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Jeff Randall
Authorized Agent
Terrapins Owner LLC