



RESIDENTS COALITION of Chelan County

January 20, 2026

Chelan County Board of Commissioners
400 Douglas St. Suite 201
Wenatchee WA 98801
Submitted via email

Re: January 27, 2026, Public Hearing for Zoning Text Amendments to Titles 7, 11, and 14 of the Chelan County Code (CCC) – Chelan County File No. ZTA 25-248

Dear Honorable Commissioners Overbay, Smith, and Hawkins:

Residents Coalition of Chelan County (RC₃) submits the comments below for the January 27, 2026, hearing on the proposed Zoning Text Amendments to Titles 7, 11, and 14 of the Chelan County Code (CCC) associated with Chelan County File No. ZTA 25-248. We have followed these proposed changes as they were reviewed by the Planning Commission, providing comments along the way, and now respectfully submit the following comments specifically for consideration by the Board of Commissioners.

11.88.170 Storage-Vehicles and Storage Containers

Chelan County Code (CCC) 11.88.170(F) pertains to the placement of “storage containers” on parcels that are zoned “rural residential” (e.g., RR2.5, RR5, etc.). Previously, such storage containers could only be used on a temporary basis. The proposed code revisions would now allow the placement of storage containers on parcels permanently.

The code language initially proposed to the Planning Commission would have required:

Cargo container, railroad cars and semi-truck trailers and other similar storage containers shall be modified to reflect the residential character of the lot and surrounding neighborhood. Examples of modifications include but are not limited to; siding materials, pitched roof, removal of wheels and other similar features.

RC₃ supported this language to help prevent storage containers from creating a visual nuisance for neighbors and other members of the public. However, the Planning Commission felt this was too onerous and reduced these requirements to a single requirement that the storage containers be painted in a color consistent with the surrounding environment. Taking all factors into consideration, RC₃ can support the proposed requirement for the exterior of the storage container with the addition shown in italic/underline font “...be painted *and kept free of rust* to reflect the residential character of the lot and surrounding neighborhoods in all material respects.” We assume that this will be interpreted in such a way to ensure containers are in good exterior condition and are painted in appropriate colors.

We also recently identified another related issue. Although it is somewhat difficult to determine by reading the code, it was confirmed with Susan Dretke with Community Development that storage containers in all zones other than “rural residential” areas are allowed to have storage containers permanently placed without any aesthetic requirements or limits on the number of containers (other than general requirements for setbacks, lot coverage, etc.). This means very limited restrictions on the placement of containers on parcels in zones that are not “rural residential” such as AC and all zones in any unincorporated Urban Growth Area (UGA) (e.g., Manson).

So, while RC₃ understands the affordability and simplicity of utilizing storage containers, we have the following suggested modifications to the proposed code language:

- 1) The proposed code language for “rural residential” zones, and existing code for other areas, allow as many storage containers on a parcel as allowed by space. This is excessive. We propose that the number of storage containers allowed be restricted as follows, which should be more than sufficient for personal use:
 - a. Lots less than 5 acres: One storage container.
 - b. Lots greater than 5, but less than 10 acres: Two storage containers.
 - c. Lots greater than 10 acres: Three storage containers.
- 2) Any code developed for CCC 11.88.170(F) should apply everywhere in unincorporated Chelan County, including within unincorporated UGAs (except perhaps for industrial zones). It makes no sense for some residents in the county to be protected from adverse visual impacts and a high number of containers while others are not.

11.04.020 District Use Chart

Code changes are being proposed in the District Use Chart for Wireless Communication Facilities. Under the proposal, they would now be required to obtain a Conditional Use Permit. RC₃ supports this change to allow public input for this type of action that is often considered to be intrusive and unwanted in many circumstances. Public input is likely to result in projects that are more acceptable to the surrounding community.

14.98.73X Farmstay

11.04.020 District Use Chart

11.93.330 Recreational vehicle parks/campground.

11.93.370 Small-scale recreational or tourist use.

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RC₃ understands and supports the desire of Chelan County to provide agricultural tourism options to farmers to help increase the viability and sustainability of agricultural operations. As such, we generally support these code changes.

Our primary concern would be the potential abuse of this code by property owners whose primary goal is not farming/agriculture. We note the requirement that the property meet the definition of Farm and Agricultural land in RCW 84.34.020(2) is not restrictive overall in terms of the total area of parcels that can qualify. This would allow parcels of just about any size to operate five RV sites with minimal actual farming taking place. Allowing five RV sites to preserve one or two acres of farmland is not appropriate in our view.

However, we also note that small RV parks may not be profitable if they do not have a reasonable number of RV sites available to rent. For example, five RV sites may not be profitable at all for farmers once infrastructure and management costs are accounted for, although circumstances may vary. Therefore, to prevent RV parks from being operated on small lots, while trying to ensure that RV parks on larger lots have a reasonable chance of being profitable and actually improving the viability of farming in Chelan County, we propose the following restrictions on the number of Farmstay RV sites allowed:

- 1) No Farmstay RV sites allowed on farming operations less than 5 acres.
- 2) 5 Farmstay RV sites on farming operations greater than 5, but less than 10 acres.
- 3) 8 Farmstay RV sites on farming operations greater than 10, but less than 15 acres.
- 4) 16 Farmstay RV sites on farming operations greater than 15, but less than 20 acres.
- 5) 20 Farmstay RV sites on farming operations greater than 20 acres.

The City of Chelan recently updated its agricultural tourism code to add a new tourist accommodation option. On requirement of this new land use that was used to ensure that a significant amount of agriculture was actually taking place was to require that at least 51 percent of the total land area was covered with active agriculture. The Commissioners might also consider such a requirement for Farmstays to help prevent abuse of the code by those who are more interested in running an RV site than farming.

Other than the issues noted above, RC₃ supports the proposed code changes to these sections.

7.35.030 Public Disturbance Noises

The existing code language in this section depends on the qualitative “reasonable person standard”. While this standard has been upheld in court rulings, it is open to interpretation and has rarely been enforced in Chelan County in the past. We assume that CCC 7.35.030 was added to the docket to see if code changes could be enacted to come up with noise code that is more clearly enforceable and better serves the public.

The proposed additions to the code related to restrictions on amplified music are helpful, but RC₃ feels that it would be a disservice to the public to not do more. The original code language proposed to the Planning Commission included the following:

(1) No person shall cause or permit noise to intrude into the property of another person which noise exceeds the maximum permissible noise levels set forth below in this section.

(2)(a) The noise limitations established are as set forth in the following table after any applicable adjustments provided for herein are applied.

<u>edna of</u> <u>noise source</u>	<u>edna of</u> <u>receiving property</u>		
	<u>Class</u> <u>A</u>	<u>Class</u> <u>B</u>	<u>Class</u> <u>C</u>
<u>class</u> <u>a</u>	<u>55</u> <u>dBA</u>	<u>57</u> <u>dBA</u>	<u>60</u> <u>dBA</u>
<u>class</u> <u>b</u>	<u>57</u>	<u>60</u>	<u>65</u>
<u>class</u> <u>c</u>	<u>60</u>	<u>65</u>	<u>70</u>

(b) Between the hours of 10:00 p.m. and 7:00 a.m. the noise limitations of the foregoing table shall be reduced by 10 dBA for receiving property within Class A EDNAs.

(c) At any hour of the day or night the applicable noise limitations in (a) and (b) above may be exceeded for any receiving property by no more than:

- (i) 5 dBA for a total of 15 minutes in any one-hour period; or
- (ii) 10 dBA for a total of 5 minutes in any one-hour period; or
- (iii) 15 dBA for a total of 1.5 minutes in any one-hour period.

(3) At no time shall outdoor amplified music be allowed in the Commercial Agriculture (AC) designation without an approved Conditional Use Permit for Places of Public and Private Assembly which identifies and addresses, time, location and frequency standards, along with monitoring criteria.

Unfortunately, the Planning Commission quickly determined that enforcing noise code with specific decibel limits would be untenable before they conducted any research into the issue. RC₃ strongly advocates for enacting specific decibel limits into Chelan County’s noise code as has been done in many other jurisdictions in Washington, including the local examples of Douglas County and the City of Leavenworth.

Douglas County code 8.04.090 (Maximum noise levels) includes decibel-base limits identical to those shown above. Leavenworth Municipal Code 9.33.030 (Public disturbance noise) contains similar numeric limits.

An RC₃ board member contacted Leavenworth Community Development Director Maggie Boles to discuss the usefulness and effectiveness of having decibel-based noise code. This discussion solidified RC₃’s support for this type of noise code.

Ms. Boles indicated that she supports the use of decibel-based noise measurement because it eliminates the judgement element of compliance. The city has purchased sound measurement equipment and can



complete its own compliance measurements. She noted that the equipment is inexpensive and easy to operate. She also stated that the city will be making some modifications to its noise code in the near future, but they intend to retain the decibel-based thresholds.

She acknowledged that the Chelan County Sheriff's Office does not currently have the equipment to measure compliance with the city's decibel-based noise code. However, it is her hope and intention that they will eventually. She pointed out that the city's contract with the Sheriff's Office requires enforcement of all city code, which would include the numeric decibel-based noise standards.

If Chelan County were to also enact decibel-based noise standards, it would provide additional incentive for the Sheriff's Office to invest in a few sound meters. Appropriate sound meters cost less than \$400 each. They are easy to operate and maintain, and training times would be minimal. Perhaps some of these costs could be covered by grants. But unless decibel-based noise standards are in the code, no progress will be made toward making this happen.

There seems to be a general aversion to implementing something new in this case, but the ability to take human judgement out of the equation when determining noise violations would be significant. Law enforcement embraced the use of breathalyzers for determining DUI violations and we believe this should be no different.

If Douglas County, Leavenworth, and dozens of other cities and counties in Washington can add these standards to their noise code, Chelan County should be able to as well.

With this addition to the proposed noise code text, RC₃ supports the proposed changes to the noise code.

Thank you for your thoughtful consideration of our suggestions. Please contact RC₃ Board President Brian Shugrue (shugruebf@msn.com) with any questions or comments.

Sincerely,

**Residents Coalition of Chelan County
Board of Directors**