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## **Report & Summary of the Scoping Process for the 47° North Master Plan Project Supplemental Environmental Impact Statement**

### 1. Introduction & Background Information

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The purpose of this document is to summarize the comments received during the State Environmental Policy Act (SEPA) scoping period for the **47° North Master Plan Project** Supplemental Environmental Impact Statement (SEIS), and to establish and document the areas of investigation that will be included in the SEIS. This document also provides background information on the revised master plan proposal and the City's land use review process.

This report contains a detailed summary of the SEIS scoping process, a summary of the comments received during the scoping comment period, and any revisions to the SEIS scope based on public input received through the scoping process. **Attachment A** includes a table that shows the comment topics in each comment letter. **Attachment B** provides a table that lists specific comment themes. Additional information, including records of public notice actions, a complete mailing list, and a list of all the commenters on the SEIS scope during the scoping period are available for review at the City of Cle Elum.

## Project Background

In 2002, the City of Cle Elum approved a sub-area plan, master plan, and development agreement for an approximate 1,000-acre property owned by New Suncadia (then Trendwest) and located in the City's Urban Growth Area (UGA). The property, which is generally bounded by I-90, Bullfrog Road, SR-903, and the city cemetery, was subsequently annexed to the city. An EIS, which studied five development alternatives, was prepared for the project; that EIS was not challenged. These alternatives included a range of types and amounts of development on the site, and alternative locations for such uses. The EIS evaluated all SEPA "elements of the environment" (per WAC 197-11-444) in detail. Alternative 5 from the Cle Elum UGA EIS was ultimately proposed and approved by the City. The master plan approved by the City in 2002 included a total of 1,334 housing units, in a mix of single family (810) and multi-family (524) units. A 75-acre business park (950,000 sq. ft.) was also included. Land was identified for future development of affordable housing and recreational facilities as well. Almost one-half of the overall property would be retained in open space/buffers.

Sun Communities is acquiring 824 acres of the site from New Suncadia. Based on review of preliminary information submitted for a pre-application meeting, the revised plan will contain the same total number of units (1,334) as the approved master plan, but in a different mix of types or forms and in modified locations. The characteristics and patterns of use are likely to be different compared to what was evaluated in the UGA EIS and approved by the City in 2002. The City has determined that, based on these changes, the revisions to the plan constitute a "major amendment", as that term is defined in the development agreement. The City's land use approval process for the amended master plan will involve review by the Planning Commission and the City Council.

## Revised Proposal & Determination of Significance (DS)

The City of Cle Elum is the lead agency for SEPA review for projects within the city and is responsible for performing the statutory duties required for the **47<sup>th</sup> North Master Plan Project**. Lucy Temple, the City Planner, is the designated Responsible Official for conducting SEPA review.

Based on review of preliminary project information, the City of Cle Elum determined that the proposal is reasonably likely to have adverse impacts on the environment, and that an SEIS, prepared consistent with WAC 197-11-620, is an appropriate SEPA document to review the impacts of the revised master plan proposal. The SEIS will supplement the information contained in the 2002 UGA EIS. As recommended in a *SEPA Memorandum* prepared for the City, the SEIS will address *all* environmental issues/"elements of the environment" (per WAC 197-11-444), and will provide updated or revised analysis, as appropriate, to reflect changed conditions and the revised master plan.

The City of Cle Elum initiated the SEIS scoping process for the **47<sup>th</sup> North Master Plan Project** on October 8, 2019, by carrying out the following actions:

- Issued a SEPA DS/Request for Comments on the Scope of the SEIS. The DS/Request for Comments included notification of a public meeting on October 23, 2019, to provide the public with an opportunity to become more familiar with the proposal and to comment on the scope of the SEIS. It also gave notice of the statutory 21-day scoping period. The DS/Request for Comments is available for review at: [http://cityofcleelum.com/wp-content/uploads/2019/10/19-1008\\_DS\\_scoping-notice\\_SIGNED-1.pdf](http://cityofcleelum.com/wp-content/uploads/2019/10/19-1008_DS_scoping-notice_SIGNED-1.pdf)
- Mailed copies of the DS/Request for Comments to federal, state, regional and local agencies, and tribes; and to households within 300 feet of the site (measured from the boundaries of the property);
- Published the DS/Request for Comments in the WA State Depart. of Ecology's SEPA Register;
- Posted the DS/Request for Comments on the City of Cle Elum website;
- Posted the DS/Request for Comments on Facebook;
- Published the DS/Request for Comments in the *Northern Kittitas County Tribune* (on October 10, 2019) and the *Daily Record*; and,
- Posted approximately six locations around the site and posted nine locations around Cle Elum and Roslyn, including the libraries, post offices, etc.

The EIS Scoping notification actions meet or exceed all applicable noticing requirements.

The DS/Request for Comments *preliminarily* identified two alternatives for analysis in the EIS:

- **Alternative 6 – Revised Master Plan:** Revise the approved 2002 Bullfrog Flats master plan to allow development on 824 acres of the approximate 1,000-acre property, including:
  - 1,334 residential units:
    - 527 single family (manufactured homes)
    - 180 multi-family
    - 627 RV sites
  - 536 acres of open space
  - Public and private recreation amenities
  - Affordable housing site. The 2002 EIS assumed development of approximately 50 units of affordable housing on a 7-acre site dedicated to the City by Suncadia. The SEIS may analyze a greater number of units on the site, based on the limits in its zoning code (up to 100 units). The purpose would be to provide a comparison to the 2002 master plan and to analyze a range of potential housing development in the SEIS. Sun Communities would dedicate a site, but the site would be developed by others in the future; there is no proposal to develop affordable housing at this time.

- Public recreation facility site

A 27-acre commercial/business park site (owned by Suncadia) will be developed in the future. Development of that property will likely be evaluated in the SEIS.

- **No Action Alternative:** A “No Action” alternative is required by SEPA. For purposes of analysis in the SEIS, No Action is defined to mean that no revisions to the approved 2002 Bullfrog Flats master plan and associated development would occur at this time. However, development of the site could occur in the future, consistent with the approved 2002 master plan and development agreement.

The DS/Request for Comments preliminarily identified *all* elements of the environment that were studied in the 2002 EIS for review, updating and analysis in the SEIS:

- |  |                             |
|--|-----------------------------|
| ● Earth  | ● Aesthetics                |
| ● Water Quantity & Quality                                     | ● Cultural Resources        |
| ● Plants & Animals   | ● Parks & Recreation        |
| ● Air Quality & Greenhouse Gas Emissions (GHGs is a new issue) | ● Transportation            |
| ● Noise  | ● Public Services           |
| ● Land Use/Plans & Policies                                    | ● Utilities                 |
| ● Population, Housing, & Employment                            | ● Economic & Fiscal Impacts |

## 2. SEIS Scoping Process

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Scoping provides notice to agencies, tribes, and the public that an EIS, in this case an SEIS, will be prepared for a proposal that is likely to cause a significant impact to the environment. The intent of scoping is to identify public, agency, and tribal comments and concerns on the environmental issues and alternatives that should be addressed in detail in the SEIS. Although scoping is optional for an SEIS (WAC 197-11-620(1)), the City of Cle Elum elected to solicit scoping comments for the **47<sup>th</sup> North Master Plan Project** SEIS to inform and engage the public.

The scoping process provided opportunities for agencies, tribes, and interested members of the public to submit written comments via mail or email, or on comment forms provided at a public meeting.

A public scoping meeting was held on October 23, 2019, from 5:30 to 7:30 at the Walter Strom Middle School in Cle Elum. A total of 141 attendees signed in at the meeting (the actual number of attendees may have been greater because not everyone may have elected to sign in). The meeting was set up as an open house, with presentations by City of Cle Elum and the applicant, Sun Communities, and included an extended question and answer period. A continuous opportunity to provide written comments was provided throughout the meeting. The presentation described past SEPA review and approvals, the current vision

for the **47<sup>th</sup> North Master Plan Project**, the range of alternatives and the elements of the environment proposed for study in the SEIS, and the estimated project timeline going forward. City staff and Sun Communities representatives were available throughout the open house to answer questions about the SEPA process and the proposal, respectively.

Meeting materials were made available online at:

<http://cityofcleelum.com/city-services/administrative-services/public-notice/proposed-47-north-project/>

### 3. Scoping Comments Received

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This section of the report provides a high level and general summary of the range of comments received during the scoping process. More specific information about the categories of issues raised and the number of comments received for each category, is contained in **Appendix A** and **B**.

During the SEIS scoping period, a total of 591 comments were received from 127 commenters (there were 114 unique commenters; some individuals provided multiple comment letters). Comments were largely submitted by individuals, with six letters from public agencies and Tribes (City of Roslyn [2 letters], WA State Dept. of Ecology, WA State Dept. of Fish and Wildlife, WA State Dept. of Transportation, and Yakama Nation Tribe). Of the comment letters, 99 were received via email, 11 via mail, and 17 at the meeting. Several comments were received after the close of the comment period. As a courtesy, these comments are also included in the following summary.

All comment letters/emails/forms/transcript are available for review at City of Cle Elum.

#### Comments on SEPA Process

Several commenters were critical of how noticing for scoping occurred and requested an extension of the comment period and suggested notice be provided using different methods. One commenter noted that scoping should not be conducted (or should be extended) until after an application is filed. Other comments addressed the assumed depth of study for the SEIS, requesting that a new document be prepared with entirely new or substantially updated studies throughout, and that new mitigation measures be identified. Several commenters requested or asked whether SEPA review was being phased.

#### Comments on Alternatives

A number of commenters requested that the SEIS consider new or revised alternatives. These comments included the following suggestions:

- Reduce the size of the project/number of units

- Eliminate, reduce, or move the RV park
- Add a grocery store
- Add more low income/affordable housing
- Develop the site in 3-ac. horse lots
- Include more open space

## Comments About Impacts to the Environment

The majority of commenters expressed concerns about impacts that the proposal could cause to various elements of the environment. The chart below summarizes the number of letters, emails, or comment forms received containing comments about a particular element of the environment (see **Appendix A** for details). More details about the comment themes are provided in **Appendix B**. The following is a brief and high-level overview of concerns expressed in the comments.

	Number of letters with comments on each element
<b>Letters with Comments by SEPA Element of the Environment</b>	
· Earth	0
· Water Resources	17
· Plants and Animals	49
· Air Quality/Greenhouse Gas Emissions	11
· Noise	11
· Land Use/Relationship to Plans and Policies	71
· Aesthetics/Light and Glare	28
· Population/Housing/Employment	24
· Cultural Resources	1
· Parks and Recreation	21
· Transportation	72
· Public Services – police, fire/emergency services, schools	78
· Utilities – water and sewer	46
· Economic/Fiscal Impacts	56

### Impacts to the Natural Environment

The project’s impacts on the natural environment were a concern of numerous commenters. This concern included impacts from stormwater runoff and water usage on waterbodies on-site and in the vicinity (e.g., Cle Elum River and Yakima River). Forest habitat removal and fragmentation impacts of the project, including to the local elk herd, were noted by several commenters. Impacts on forest vegetation from fire risk, and on wildlife and fish from noise, pollution, light, and traffic were also mentioned.

### Impacts to Rural Character/Scenic Experience

Many commenters expressed concerns about the impacts of the proposal, based on its size, uses and character, on the rural character of the area, including upper Kittitas County communities (e.g., Roslyn and Ronald) and Cle Elum. Others commented on the potential for land use impacts to Suncadia/Tumble Creek. A large number of commenters questioned whether the project would affect the scenic and natural qualities of the area, particularly views of wooded areas from Bullfrog Road and I-90. The possibility of “dark sky” impacts from project lighting was also noted.

### Impacts to Public Infrastructure, Services, and Facilities

A large number of comments centered on how the proposal would place a burden on existing public infrastructure, services, and facilities, including roads/transportation facilities, schools, police/fire/emergency services, and water/sewer systems. Many comments stated that much of this infrastructure and many of these services may already be at capacity. Impacts on public services – including schools, fire, and police service – were the most common concerns, followed by transportation, and then utilities. Several commenters expressed concern about the potential for the RV park to result in an increase in crime. Many of the transportation comments focused on impacts to roadways surrounding the site (e.g., Bullfrog Road, I-90, and SR-903) and in nearby communities, such as Roslyn, during the summer and weekend periods when tourism is greatest.

### Impacts to Economic and Fiscal Conditions

A considerable number of comments expressed concern about the proposal’s fiscal and economic impacts on local communities. Many questions were raised about whether and how property taxes from the site would cover the increased impacts from the project on public infrastructure and services, particularly given the way the manufactured homes and RV sites would be owned/leased and taxed. Several commenters noted concerns about effects on property and home values (both on and off-site), mitigation fees/need for a shortfall agreement, and housing affordability. Comments on economic conditions related to the project’s impacts on local jobs during construction and local businesses during operation (including the need for a new grocery store).

### Comments Outside the Scope of SEPA

### Support for or Opposition to the Proposal

Many commenters expressed general opposition to or support for the revised master plan (Alternative 6). A total of 36 commenters indicated opposition to the proposal and one expressed support for the proposal. Expressions of support for or opposition to the proposal itself do not address environmental issues or provide information about the scope of the SEIS, which are the focus of the scoping process. These comments are outside the scope of an EIS.

## Socio-Economic Comments

A number of comments were received regarding issues that are beyond the scope of SEPA review, consistent with the SEPA rules (WAC 197-11-448, 197-11-450). This category of issues is generally socio-economic in substance and does not focus on environmental concern appropriate to an SEIS. These non-environmental issues are discussed further in **Section 4**, below.

## 4. Conclusions/Revisions to the EIS Scope

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This section of the report contains the City's conclusions about the scope of the SEIS and alternatives. These conclusions are based on consideration of public, agency, and tribal comments submitted during the scoping process, and the requirements of SEPA.

### SEPA Process

Scoping is not required for an SEIS, but the City elected to conduct it nonetheless to promote interagency cooperation and public participation. The City used "reasonable methods" to inform the public and other agencies that an SEIS is being prepared and a public scoping meeting was being held. The City followed the noticing requirements listed in WAC 197-11-510 and the City Municipal Code.

SEPA encourages early review of proposals and does not require that an application be filed before a DS may be issued or scoping and preparation of an SEIS may be initiated. The City determined that the pre-application materials submitted by the applicant were sufficient to identify the likely environmental impacts of the proposal. It is not expected that there will be substantial changes to the project in the formal application; significant changes could trigger a modification of the SEIS scope. In addition, the City had previously identified that it intended to include, update, and reevaluate all elements of the environment that were considered in the 2002 UGA EIS. Based on this commitment, the City did not feel it was necessary to extend the scoping period as requested by one comment. There will be a number of future opportunities for public participation in the SEIS process, including the public comment period on the Draft SEIS.

The City has expressed its intent and commitment to prepare an SEIS that is thorough and complete, but that also uses existing environmental information to the extent that it is relevant and valid. Use of existing environmental information is encouraged by the SEPA rules and is logical in the situation of a revised master plan proposal.

The SEIS will use and demonstrate the following approach: for each element of the environment, the SEIS will: (1) update existing conditions, as necessary; (2) summarize the major conclusions in the 2002 Final EIS; (3) identify any changes to regulations that may affect the revised proposal; (4) compare impacts under the current proposal to those identified in the 2002 Final EIS (for Alternative 5, the alternative that was ultimately approved); and, (5) identify previous and new mitigation applicable to the current proposal.



The technical analyses that will be prepared in support of the SEIS will be conducted using up-to-date methodologies and will comply with current regulations.

The City anticipates that the applicant will submit information that is sufficient to prepare a project-specific SEIS for the proposed master plan. To the extent that project level analysis can be prepared in the SEIS, future environmental review should not be necessary unless there are substantial changes to the proposal or if some additional detailed information (e.g., detailed engineering or design) is necessary in the future to review a development permit. If that expectation changes, and phased or additional review appears to be appropriate, the City will indicate that change in the SEIS to the extent it is known. In any event, when a development application is received subsequent to master plan approval (e.g., a preliminary subdivision), the City will perform the type of review required by SEPA to determine whether impacts have been addressed sufficiently in the master plan SEIS, or whether and what type of additional review is required by SEPA. That determination cannot be made at this time.

## Alternatives

The City of Cle Elum has determined that the two alternatives preliminarily identified for review in the SEIS – Alternative 6/Revised Master Plan, and No Action – together with the five alternatives that were previously analyzed in the 2002 EIS, represent a reasonable number and range of alternatives, as defined by the SEPA rules (WAC 197-11-440(5)). Alternative 6 meets the applicant’s objectives for the project and may reduce impacts on certain elements of the environment compared to Alternative 5/the approved master plan. Preliminary plans indicate that the current proposal includes the same number of residential units (1,334), a greater amount of open space (536 ac. vs 446 ac.), and less business park area (27 ac. versus 75 ac.) than the approved master plan. The SEIS will describe the planning process for Alternative 6, which included several iterations/improvements to the master plan in response to new technical information prepared for the project.

The SEIS may also include an additional scenario/alternative that examines a variation in the mix of unit types but without change to the total number of units proposed (i.e., more of one type and less of another). This would be responsive to some comments received during scoping, and to a request by the applicant.

## Elements of the Environment

The greatest number of comments received during the public scoping period expressed concerns regarding: **Land Use/Plans and Policies, Transportation, Public Services, and Economic and Fiscal Impacts.** Other comments related to Plants and Animals, Air Quality/GHGs, Noise, Aesthetics/Light and Glare, Population/Housing/Employment, Cultural Resources, Parks and Recreation, and Utilities. All concerns fall within elements of the

environment which were identified in the scoping notice for detailed study in the SEIS. As noted previously, the City intends to review and update the analysis for all elements of the environment considered in the 2002 UGA EIS, and to add greenhouse gas emissions.

Many comments raised particular concerns or individual variations on issues within the broadly defined SEIS topic areas. These specific concerns have been used to expand or refine the scope of analysis for some environmental issues that were already identified for analysis. For example, some intersections will be added to the SEIS analysis to reflect comments about potential congestion at particular locations, or changes in the local road system. The scope additions include the following:

- **Transportation**: An analysis of the impacts of the project on the traffic congestion and transportation system operations was included in the scope of the SEIS. The study area for the analysis has been modified somewhat relative to the intersections analyzed in the 2002 UGA EIS transportation analysis to reflect changes to the road system that have occurred since development of Suncadia, and to provide greater focus on some locations within or near adjacent cities (i.e., SR-903 intersections in/near Roslyn and Ronald).
- **Surface Water Resources**: Updating information on the Cle Elum River and on-site wetlands are components of the scope of the SEIS. Additional investigation will be conducted to determine if any streams, including seasonal streams, are located on-site. Any additional streams would be delineated and classified according to the current City of Cle Elum critical areas code.

## Non-SEPA Issues

A SEPA EIS/SEIS is not required to review every concern that may be evaluated by decision-makers in making a final decision about a project (WAC 197-11-448(2)). SEPA is focused on *environmental* impacts and environmental documents are accordingly limited to specific, “elements of the environment” that are listed in state rules (WAC 197-11-444), such as land use, transportation, or public services. Several concerns expressed in scoping comments are considered to be “socio-economic” factors, such as the project’s possible impacts on property values and crime. While socio-economic concerns such as these may be considered and accounted for during the overall decision-making process for a project, a SEPA document is not required to evaluate them. Other considerations that are considered to be outside the purview of SEPA include: methods of financing proposals, economic competition, profits and personal income and wages, and social policy analysis (WAC 197-11-448(3)), and monetary costs and benefits (WAC 197-11-450).

The SEIS will, however, include analyses of the project’s potential impacts on the local economy and fiscal conditions in City of Cle Elum. Although these issues are not technically elements of the environment, they may be and frequently are evaluated in SEPA documents. And although “crime” is not itself a SEPA topic, the SEIS will evaluate the

impacts of the project on police service, which is a public service appropriate for SEPA analysis.

## Conclusion

In conclusion, the City of Cle Elum has determined the following:

1. While Scoping is not required for a SEIS, the City determined it would be advantageous to conduct Scoping for the **47<sup>th</sup> North Master Plan Project** to share information about the proposal and to hear concerns about development of the project. The City conducted the scoping process in an appropriate manner, consistent with the SEPA Rules and applicable City regulations.
2. The SEIS will evaluate two alternatives: Alternative 6 – Revised Master Plan, and No Action. An alternative/scenario that examines a range of housing types within the proposed total units may also be considered.
3. The City had determined and communicated previously, and re-confirms in this report, that the SEIS will review, update, and reevaluate the analysis for *all* SEPA elements of the environment that were considered in the 2002 UGA EIS. It will also add the issue of greenhouse gas emissions (GHGs) to the SEIS. Two areas of the SEIS analyses will be modified or expanded: the transportation analysis will include some modified intersections compared to those studied in the 2002 UGA EIS; and the water resources analysis will include additional investigation for streams on-site.

## ATTACHMENT A

### Public Scoping Comment Topic Areas

47° NORTH  
Public Scoping Comment Topic Areas

	SEPA Process	Permitting	For/Against	Alternatives	Earth	Water Resources	Plants & Animals	Air Quality/ GHGs	Noise	Land Use/ P & P	Pop./Hsg.' Employ	Aesthetics	Cultural Resources	Parks & Recreation	Transportation	Public Services	Utilities	Economic/ Fiscal
Agencies, Tribes, Organizations																		
1. Roslyn	X						X				X	X			X	X	X	
1a. Roslyn	X														X	X	X	
2. WA Ecology		X				X	X											
3. WA Fish & Wildlife		X				X	X											
4. WA SDOT	X														X			
5. Yakama Nation													X					
Individuals																		
6. N. Adelson			X (A)							X	X			X		X		X
7. N. Adelson (2)			X (A)	X							X			X		X		X
8. I. Astrachan							X								X	X		X
9. M. Bates				X						X	X							
10. L. Belden (1)	X																	
11. L. Belden (2)						X	X	X	X	X	X				X	X	X	X
12. L. Belden (3)	X						X	X	X		X			X	X	X	X	X
13. E. Belew	X			X						X	X							
14. G. Berndt	X	X				X	X								X	X		X
15. T. Berndt			X (A)							X				X	X	X		
16. D. Doucet-Bertschi										X		X			X	X		X
17. BEW			X (A)															
18. I. Bjorklund	X													X			X	X
19. S. Bradshaw										X							X	
20. G. & D. Bremme										X					X	X	X	
21. B. Brandt							X					X				X		
22. R. Breckenridge	X																	
23. L. Brewer															X		X	
24. L. Browitt															X	X		
25. M. Brown			X (A)							X					X	X	X	
26. M. Canady			X (A)							X	X				X	X		X
27. T. Carosino																X		
28. A. Casto			X (A)															X
29. A. Castor							X					X					X	X
30. B. Clark						X				X		X			X	X	X	X
31. B. Clos							X		X	X		X		X	X	X	X	X
32. B. Clos															X	X	X	
33. C. Collins			X (F)									X			X	X	X	X
34. C. Cook			X (A)	X						X					X	X	X	
35. P. Cooke				X													X	
36. Cori Morthersbaugh	X		X (A)					X										X
37. D. Cowger												X			X	X	X	X
38. N. Daniel			X (A)							X					X		X	
39. S. Dowd							X	X				X			X	X	X	
40. F. Ellison	X		X (A)							X						X	X	X
41. F. Ellison	X			X						X						X		X
42. Fersch										X		X			X	X		
43. P. Fersch										X		X			X	X		X
44. B. Frankenfield			X (A)				X		X	X				X	X		X	
45. C. Frankenfield			X (A)							X		X			X	X	X	X
46. H. Fraser											X			X	X	X	X	X
47. B. Frederick	X																	

	SEPA Process	Permitting	For/Against	Alternatives	Earth	Water Resources	Plants & Animals	Air Quality/ GHGs	Noise	Land Use/ P & P	Pop./Hsg.' Employ	Aesthetics	Cultural Resources	Parks & Recreation	Transportation	Public Services	Utilities	Economic/ Fiscal
48. P. Garris			X (A)			X	X								X		X	X
49. M. Gavin										X								
50. C. Gavin										X					X	X	X	
51. G. Green				X														
52. D. Griffin							X			X	X	X		X	X	X	X	X
53. L. Haberman			X (A)															
54. M. Hammon			X (A)															
55. A. Harrington																X		
56. G. Haugen			X (A)							X				X		X		X
57. N. Henderson							X			X		X			X	X		
58. J. Herman			X (A)				X	X		X					X		X	X
59. A. Hernandez			X (A)															
60. J. Hoffman			X (A)															
61. M. Holley			X (A)							X					X	X		
62. Hopesource				X						X	X							
63. D. Hutchinson	X						X		X						X	X	X	
64. C. Jaffe			X (A)				X			X	X			X	X	X	X	X
65. V. Jarvis										X		X			X	X	X	
66. J. Jones							X			X					X			
67. J. Jones							X			X					X			X
68. A. Kidder							X			X	X				X	X		X
69. D. Kilgore										X							X	
70. M. Kuss-Cybula																X		X
71. K. Lohnes							X			X					X	X		
72. M. Long						X	X			X						X	X	X
73. S. Malcolm			X (A)				X								X	X		X
74. J. Mankus						X	X			X					X	X	X	
75. J. Marchefka			X (A)															
76. F. Mattison		X					X	X		X	X			X	X	X	X	X
77. F. Mattison										X					X	X	X	
78. D. McCaslin										X					X			
79. D. McGinnis			X (A)	X			X							X	X	X		
80. B. McGrew							X								X	X	X	
81. D. Mikkelson			X (A)							X					X	X		X
82. B. Miller							X								X	X		
83. T. Miller						X	X								X	X		
84. S. Morgan			X (A)													X		X
85. T. Moss							X			X		X		X	X	X		
86. E. Myer			X (A)				X			X	X	X			X	X		X
87. B. Nicholls			X (A)															X
88. R. Overton	X																	
89. K. Payne			X (A)				X								X	X	X	
90. L. Pearson			X (A)															
91. J. Peck				X		X	X	X		X	X				X	X	X	X
92. M. Peterson			X (A)							X								X
93. K. Phillips										X	X				X	X		X
94. L. Pisheyar							X		X	X					X			
95. A. Presler						X	X	X		X	X				X	X	X	X
96. M. Rosato								X	X	X	X			X	X	X	X	
97. J. Rossmeissl									X									
98. K. Roth															X	X	X	
99. D. Ryan										X		X		X	X			
100. G. Sanford							X			X						X		X
101. S. Sanner			X (A)				X			X					X	X		X

	SEPA Process	Permitting	For/Against	Alternatives	Earth	Water Resources	Plants & Animals	Air Quality/ GHGs	Noise	Land Use/ P & P	Pop./Hsg.' Employ	Aesthetics	Cultural Resources	Parks & Recreation	Transportation	Public Services	Utilities	Economic/ Fiscal
102. K. Shanafelt											X					X		X
103. J. Sharar	X			X		X				X						X	X	
104. S. Shovlain						X	X			X						X	X	
105. G. Silver							X			X								X
106. T. Simon										X						X		
106a. M. Simplot	X									X								X
107. K. Simpson										X		X			X	X		X
108. J. Simpson										X		X			X	X	X	X
109. J. Smallwood							X	X	X	X		X			X	X		X
110. S. Stahl										X					X	X	X	
111. L. Stauffer			X (A)							X	X							X
112. K. Sturgill				X											X	X		
113. L. Thurston				X		X	X		X	X		X		X				X
114. L. Thurston						X	X		X	X	X	X		X	X	X		X
115. L. Thurston							X			X				X	X			
116. B. Trout							X			X					X			X
117. T. Uren	X									X	X	X		X	X	X		X
118. R. Valore			X (A)			X	X	X		X					X	X	X	X
119. N. Van Wert			X (A)							X	X							
120. K. Vangaver							X					X				X	X	
121. T. Vaughn			X (A)			X	X			X		X			X	X	X	X
122. S. Winfrey																		
123. M. Winward												X		X				X
124. Unknown							X			X		X				X		

## ATTACHMENT B

### Public Scoping Comment Themes



47° NORTH  
Public Scoping Comment Themes

Topic Area	Specific Themes
SEPA Process	
	<ul style="list-style-type: none"> <li>• <i>Notice of scoping was inadequate, extend scoping</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Scoping conducted prior to formal application, extend scoping</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Phase review with project components</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Substantially update SEIS information &amp; analysis, &amp; identify new mitigation measures</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Interaction between previous EIS, previous agreements, &amp; new SEIS</i></li> </ul>
Alternatives	
	<ul style="list-style-type: none"> <li>• <i>Alternative with less development/fewer units</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Alternative with no RV park, smaller RV park, RV park in different location</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Alternative with grocery store</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Alternative with more low income/affordable housing</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Alternative with more open space/retention of trees</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Alternative with 3-ac. horse lots</i></li> </ul>
Permitting	
	<ul style="list-style-type: none"> <li>• <i>Cultural resources permitting thru DAHP in consultation with Yakama nation</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>NPDES &amp; SWPPP, &amp; water quality improvements</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>List all required permits</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Coordinate with WDFW</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Need for a rezone</i></li> </ul>
Earth	
	<ul style="list-style-type: none"> <li>• <i>None</i></li> </ul>
Water Quantity and Quality	
	<ul style="list-style-type: none"> <li>• <i>TDML update</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Potential impacts on waterbodies (e.g., Cle Elum &amp; Yakima Rivers)</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Possible seasonal stream on-site</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Water pollution, including potential for sedimentation during construction</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Water availability/water rights &amp; water usage concerns</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Stormwater control in snow events, need more space on-site</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Stormwater details: impervious surface areas, project flows, road runoff, evapotranspiration from proposed ponds</i></li> </ul>

Topic Area	Specific Themes
<b>Plants and Animals</b>	
	<ul style="list-style-type: none"> <li>• <i>Forest habitat removal &amp; fragmentation impacts on elk (habitat loss &amp; movement patterns/wildlife corridor)</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>RV park impacts (noise, pollution, trash, fire risk) on forest vegetation, wildlife, &amp; fish</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Additional water withdrawal (from proposal) on upland forest vegetation &amp; rivers (as fish habitat)</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Increased human population &amp; traffic impacts on animals (deer, elk, other wildlife) &amp; population impacts on fish (overfishing)</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Light pollution impacts on plants &amp; animals; concern that project will adhere to Dark Sky provisions</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Forest health impacts &amp; and need to “firewise”</i></li> </ul>
<b>Air Quality/GHGs</b>	
	<ul style="list-style-type: none"> <li>• <i>Air quality impacts on Suncadia/Tumble Creek</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>RV diesel pollution</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Wood-burning stove &amp; campfire impacts on air quality (suggest use of natural gas)</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Air quality impacts of constructing manufactured versus stick homes</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Climate change effects, suggest use of alternative energy</i></li> </ul>
<b>Noise</b>	
	<ul style="list-style-type: none"> <li>• <i>Noise impacts on Suncadia/Tumble Creek</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>RV park noise impacts (vehicles, generators, &amp; partying)</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>ATV recreation track noise impacts</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Horse Park noise impacts on proposed affordable housing</i></li> </ul>
<b>Land Use/Plans &amp; Policies</b>	
	<ul style="list-style-type: none"> <li>• <i>Impacts on rural character of area--including upper Kittitas County communities &amp; Cle Elum--from more intensive uses/types of uses</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Impacts of proposed uses on Suncadia/Tumble Creek</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>RV park not a good use of property</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Affordable housing &amp; Horse Park not compatible</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Phase project to reduce impacts</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Lack of retail &amp; impacts on existing retail</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Need for buffers to separate existing &amp; proposed uses</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>UGA &amp; zoning discussion need updating</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>Consistency with City’s Housing Element Policy Framework</i></li> </ul>
<b>Aesthetics/Light &amp; Glare</b>	
	<ul style="list-style-type: none"> <li>• <i>Impacts on scenic, natural quality of the area</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>View impacts from Bullfrog Road, I-90, &amp; 903</i></li> </ul>
	<ul style="list-style-type: none"> <li>• <i>“Gateway” to Cle Elum impacts</i></li> </ul>

Topic Area	Specific Themes
	<ul style="list-style-type: none"> <li>• Need for buffers along surrounding roadways to reduce view impacts</li> </ul>
	<ul style="list-style-type: none"> <li>• Impacts on Mountain to Sound Greenway</li> </ul>
	<ul style="list-style-type: none"> <li>• Concern about quality and maintenance of community</li> </ul>
	<ul style="list-style-type: none"> <li>• Lighting/Dark Sky impacts</li> </ul>
Population, Housing, & Employment	
	<ul style="list-style-type: none"> <li>• Overall size/population/number of housing units too large/not needed</li> </ul>
	<ul style="list-style-type: none"> <li>• Consistency with City growth targets</li> </ul>
	<ul style="list-style-type: none"> <li>• Cumulative growth impacts, particularly with other Cle Elum UGA projects</li> </ul>
	<ul style="list-style-type: none"> <li>• Existing need for another grocery store will be exacerbated with project</li> </ul>
	<ul style="list-style-type: none"> <li>• Affordable housing: define affordable, demand for affordable, how project reduces housing costs, who will developer be</li> </ul>
	<ul style="list-style-type: none"> <li>• More information on manufactured housing</li> </ul>
	<ul style="list-style-type: none"> <li>• Impacts on existing low-income housing in area</li> </ul>
	<ul style="list-style-type: none"> <li>• Relationship of affordable housing to 2002 Agreement</li> </ul>
Cultural Resources	
	<ul style="list-style-type: none"> <li>• Site in traditional use are of Upper Yakama (Kittitas) band</li> </ul>
	<ul style="list-style-type: none"> <li>• Site contains numerous previously recorded resources</li> </ul>
	<ul style="list-style-type: none"> <li>• New cultural resources survey required</li> </ul>
Parks & Recreation	
	<ul style="list-style-type: none"> <li>• Trails on-site are currently used by Horse Park &amp; others</li> </ul>
	<ul style="list-style-type: none"> <li>• Impacts of project on existing parks &amp; recreation facilities, including in regional &amp; Suncadia/Tumble Creek</li> </ul>
	<ul style="list-style-type: none"> <li>• Linkage of trails in project with regional trail system</li> </ul>
	<ul style="list-style-type: none"> <li>• On-site trials: public or private</li> </ul>
	<ul style="list-style-type: none"> <li>• Description of open space</li> </ul>
	<ul style="list-style-type: none"> <li>• Regional amenity center components</li> </ul>
	<ul style="list-style-type: none"> <li>• Project should provide a public pool</li> </ul>
Transportation	
	<ul style="list-style-type: none"> <li>• Existing traffic/congestion on local roads and highways a problem, particularly in summer</li> </ul>
	<ul style="list-style-type: none"> <li>• Current speed limit on Bullfrog Rd. too fast</li> </ul>
	<ul style="list-style-type: none"> <li>• Study area: I-90 exit/on ramps at Bullfrog Rd., major 903 intersections, Roslyn/S. Cle Elum intersections, Bullfrog Rd., Suncadia/Tumble Creek roadways</li> </ul>
	<ul style="list-style-type: none"> <li>• Study timeframes: summer peak weekend, undated baseline year 2019, Sunday pm peak, Friday pm peak, weekday pm peak</li> </ul>
	<ul style="list-style-type: none"> <li>• RV users will generate more traffic as they often tow a car</li> </ul>
	<ul style="list-style-type: none"> <li>• Impacts on parking in Roslyn &amp; sidewalks in Roslyn &amp; Cle Elum from additional traffic</li> </ul>

Topic Area	Specific Themes
	<ul style="list-style-type: none"> <li>• Impacts on road conditions during construction &amp; operation</li> </ul>
	<ul style="list-style-type: none"> <li>• Adequacy of roads on &amp; offsite for emergency evacuation</li> </ul>
	<ul style="list-style-type: none"> <li>• Description of street cross sections</li> </ul>
	<ul style="list-style-type: none"> <li>• Mitigation will be required on Bullfrog Road, 903, &amp; I-90 on/off ramps</li> </ul>
Public Services	
	<ul style="list-style-type: none"> <li>• Project will exacerbate existing school, police, fire/EMS, hospital overcapacity/lack of facilities, equipment &amp; personnel</li> </ul>
	<ul style="list-style-type: none"> <li>• Healthcare, mail, &amp; garbage service concerns with project</li> </ul>
	<ul style="list-style-type: none"> <li>• Project taxes won't cover impacts on services, particularly leased land</li> </ul>
	<ul style="list-style-type: none"> <li>• RV users increase crime &amp; fires</li> </ul>
	<ul style="list-style-type: none"> <li>• Woodburning should be prohibited</li> </ul>
	<ul style="list-style-type: none"> <li>• Emergency access provisions</li> </ul>
	<ul style="list-style-type: none"> <li>• Sprinklers in manufactured homes</li> </ul>
	<ul style="list-style-type: none"> <li>• Lower cost housing results in greater impacts on services</li> </ul>
Utilities	
	<ul style="list-style-type: none"> <li>• Regional sewer treatment plant/agreement</li> </ul>
	<ul style="list-style-type: none"> <li>• Water &amp; sewer system capacity concerns</li> </ul>
	<ul style="list-style-type: none"> <li>• Sewage waste from RVs will overtax gas stations</li> </ul>
	<ul style="list-style-type: none"> <li>• Project's water use effects on pricing</li> </ul>
	<ul style="list-style-type: none"> <li>• Sewer &amp; water system plans</li> </ul>
	<ul style="list-style-type: none"> <li>• Sewer &amp; water (including irrigation) demand information, flow monitoring</li> </ul>
	<ul style="list-style-type: none"> <li>• Electricity source</li> </ul>
Economic/Fiscal Impacts	
	<ul style="list-style-type: none"> <li>• Decrease in value (depreciation) of homes on leased land in project, homeowners won't build equity</li> </ul>
	<ul style="list-style-type: none"> <li>• Decrease in property taxes from proposal will increase existing taxpayers' taxes</li> </ul>
	<ul style="list-style-type: none"> <li>• Impacts to local businesses (&amp; need for grocery store)</li> </ul>
	<ul style="list-style-type: none"> <li>• Need for a shortfall agreement to cover loss of revenues during early years of project</li> </ul>
	<ul style="list-style-type: none"> <li>• Comparison of proposal &amp; approved Master Plan (particularly with reduced business park)</li> </ul>
	<ul style="list-style-type: none"> <li>• Effects of project on property values in area</li> </ul>
	<ul style="list-style-type: none"> <li>• Clarify how leased lots are taxed</li> </ul>
	<ul style="list-style-type: none"> <li>• Mitigation fees/impact fees</li> </ul>
	<ul style="list-style-type: none"> <li>• Effects of project on home prices</li> </ul>
	<ul style="list-style-type: none"> <li>• Reduced local construction jobs with manufactured (not stick construction) homes</li> </ul>
	<ul style="list-style-type: none"> <li>• Fiscal impacts on local communities</li> </ul>

Topic Area	Specific Themes
	<ul style="list-style-type: none"><li data-bbox="394 191 1480 224">• <i>Impacts on Suncadia; Suncadia homeowners pay dues 47 N residents will use their facilities</i></li></ul>
	<ul style="list-style-type: none"><li data-bbox="394 230 892 263">• <i>Will the developer be granted tax breaks</i></li></ul>