

# CHAPTER 1

## SUMMARY

### 1.1 INTRODUCTION

This chapter provides a summary of the Draft and Final Supplemental Environmental Impact Statements (Draft SEIS, DSEIS; Final SEIS, FSEIS) for the *47° North Proposed Master Site Plan Amendment*. The chapter briefly describes: the SEIS process; the SEIS Alternatives; compares the significant environmental impacts of the SEIS Alternatives to those of the preferred alternative in the 2002 Cle Elum Urban Growth Area (UGA) Final EIS; provides a high-level summary of the key impacts; and lists the mitigation measures and significant unavoidable adverse impacts of the proposal. Any changes to the information, analysis, and mitigation measures presented in **Chapter 1** since publication of the DSEIS are highlighted in grey.

Following DSEIS issuance, a 45-day public comment period was provided. A total of 110 written comment letters/emails were received,<sup>1</sup> eight phone messages were left on the dedicated phone line, and one spoken comment was made by an individual at the virtual public meeting. Most of the comments related to the municipal/community recreation center that is required in the Development Agreement for the 2002 Bullfrog Flats (now 47° North) Master Site Plan.

Please see **Chapter 2** of this FSEIS for a more detailed description of the Proposed Actions and Alternatives, including any changes to the proposal since publication of the DSEIS; **Chapter 3** for key topic area responses to the comments received on the DSEIS, and updated information and analysis;<sup>2</sup> and **Chapter 4** for all the comments that were received during the comment period (as well as two comment letters received after the comment period ended).

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<sup>1</sup> Note that a couple of commenters submitted more than one letter, and several letters were signed by more than one individual. Also, two comment letters were received after the comment period; as a courtesy, these letters are included in this FSEIS.

<sup>2</sup> Many comments that were received on the DSEIS identified common topics, and these are referred to as “topic areas” in this FSEIS. This approach is intended to reduce repetition and to provide a single comprehensive response to identical or similar comments that share a common theme. **Chapter 3** of the FSEIS lists the key topic areas and provides collective responses to the substantive comments. Additional information and analyses were prepared to address some of the comments and are also summarized in **Chapter 3** under the applicable responses. Technical memos including the complete updated information/analysis are in the appendices to this FSEIS.

Bullfrog Flats is an approximately 1,100-acre property located in the southwestern portion of the City of Cle Elum, generally bounded by I-90, Bullfrog Road, SR-903, and the City cemetery. The property is currently owned by New Suncadia, LLC (“New Suncadia”). In 2002, the City approved a Subarea Plan, Master Site Plan, and Development Agreement for the property, and it was annexed to the City that same year. Sun Communities, the Applicant, is in the process of acquiring approximately 824 acres of the Bullfrog Flats property from New Suncadia and is proposing changes to the approved Master Site Plan. New Suncadia is retaining a portion of the property and intends, in the future, to possibly develop approximately 25 acres for commercial use.

The City of Cle Elum concluded that the proposed revisions to the approved Master Site Plan would constitute a “major amendment”, as that term is defined in the Development Agreement. Because of the proposed changes, and the time that has passed since the original EIS was published, the City determined that an SEIS should be prepared to update all aspects of the 2002 Cle Elum UGA EIS, as necessary, to reflect the changes that have occurred. Per the SEPA Rules (WAC 197-11-405(4)), an SEIS should be prepared if there are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts, or there is significant new information indicating, or on, a proposal’s probable significant adverse impacts. This SEIS assesses the potential environmental impacts and required mitigation measures associated with the proposed amendments to the approved Master Site Plan. The SEIS also provides a basis for amending the approved Development Agreement (or preparing a new Development Agreement) and modifying or identifying conditions of approval and development standards, as appropriate.

## **1.2 SEIS ALTERNATIVES**

Two alternatives have been identified for study in this SEIS: SEIS Alternative 5, the Approved Bullfrog Flats Master Site Plan (the No Action Alternative), and SEIS Alternative 6, the Proposed 47° North Master Site Plan Amendment (the Applicant’s proposal). Both SEIS Alternatives are compared to FEIS Alternative 5, the Original Bullfrog Flats Master Site Plan from the 2002 Cle Elum UGA EIS to help show relative changes in impacts. SEIS Alternative 5 is essentially the same as FEIS Alternative 5, as the Master Site Plan was ultimately approved and conditioned by the City; it has also been updated to reflect current conditions and regulations. Further descriptions of the SEIS Alternatives are provided below; the SEIS Alternatives are described in detail in **Chapter 2** of this **FSEIS**.

### **SEIS Alternative 5 (No Action Alternative) – Approved Bullfrog Flats Master Site Plan**

Under SEIS Alternative 5, the site would be developed with the following land uses in phases over a 30-year buildout period:

- Residential Uses – 1,334 residential units (810 single family units and 524 multi-family units);

- Parks/Trails – Pocket parks, ponds/lakes, and a trail system;
- Recreation Centers – Neighborhood clubhouse;<sup>3</sup>
- Open Space – 524 acres (49% of the site) of open space;
- Cemetery Expansion Site – A 10-acre site would be reserved for future expansion of the Laurel Hill Memorial Park cemetery;
- Affordable Housing Site – A 7.5-acre site would be required to be reserved and dedicated to the City for future development of affordable housing;
- Business Park/Commercial Uses – A 75-acre property would be developed with approximately 950,000 sq. ft. of business park use, potentially including: light industrial, research and development, warehousing, offices, and limited retail; and,
- School Expansion, Water Treatment Plant, Horse Park Sites – 222 acres reserved for school, utility, and recreational (Horse Park) uses were subsequently dedicated to various governmental entities and have been developed.

The above types and amounts of uses are largely the same as those under FEIS Alternative 5.

SEIS Alternative 5 serves as the “no action” alternative that is required by SEPA and compared to the proposal. According to the SEPA Rules, “no action” does not necessarily mean that nothing (no development) would occur on the site. This alternative is typically defined as what would most likely happen if the proposal did not occur (i.e., if the City took no action on the proposal). Given that there is an approved Master Site Plan and Development Agreement for the Bullfrog Flats project, the No Action Alternative studied in this SEIS represents development of that approved project, which could go forward, but updated to reflect current conditions and regulations.

### **SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment**

SEIS Alternative 6 represents the Applicant’s proposed amendment to the approved Bullfrog Flats Master Site Plan. The 824-acre 47° North site and 25-acre adjacent property would be developed in the following land uses in phases over a 17-year buildout period (the residential and recreational uses would buildout over 7 years and the future commercial uses on the adjacent property could buildout over 17 years):

- Residential Uses – 707 residential units (527 single family units, 180 multi-family units);
- RV Resort – 627 RV sites;
- Parks/Trails – Two private community parks and three public trail parks, and a 6-mile trail/sidewalk system;

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<sup>3</sup> Since publication of the DSEIS, a 12-acre site on the 47° North property was dedicated to the City for a future municipal (community) recreation center.

- Recreation Centers – A 6-acre adventure center open to residents and the public; and two private recreational amenity centers totaling 11 acres;<sup>4</sup>
- Open Space – 477 acres of open space (58% of the site);
- Cemetery Expansion Site – A 13-acre site reserved for future expansion of the Laurel Hill Memorial Park cemetery, to be dedicated to the City;
- Affordable Housing Site – A 6.8-acre site reserved and dedicated to the City for future construction of affordable housing by others; and,
- Commercial Uses – A 25-acre contiguous property that is not part of the 47<sup>o</sup> North Master Site Plan that could be developed in the future with 150,000 sq. ft. of commercial uses, potentially including: grocery store, retail, restaurant, and medical office uses.

The types and amounts of land uses would differ from those under FEIS and SEIS Alternative 5.

## 1.3 IMPACTS

This section initially includes a summary of the key impacts that would potentially result from construction and operation of SEIS Alternatives 5 and 6. Following the key impacts discussion is **Table 1-1**, which provides greater detail on the significant impacts of the SEIS Alternatives. The key impacts discussion and summary table are not intended to be a substitute for the complete discussion of each element that is contained in **Chapter 3** of the Draft SEIS and of this FSEIS and should not be relied on by readers to make judgements about the completeness or sufficiency of the discussion in the DSEIS/FSEIS. Note that FEIS Alternative 5 is not included in **Table 1-1** as the differences between this alternative and SEIS Alternative 5 are negligible.

### Summary of Key Impacts

Construction and operation of SEIS Alternatives 5 and 6 would result in impacts to the natural and built environment, similar to other large, mixed-use developments in urban areas. The impacts of SEIS Alternative 5 would be almost identical to those described under FEIS Alternative 5 in the 2002 Cle Elum UGA EIS because the mix and layout of uses and the buildout period would be nearly the same. However, the impacts under SEIS Alternative 5 would be somewhat less due to adherence to current, typically more stringent regulations. In general and overall, the impacts of SEIS Alternative 6 would be less than those for FEIS and SEIS Alternative 5 because the buildout period would be shorter; most of the residential units would be manufactured offsite and assembled onsite; there would be fewer

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<sup>4</sup> Ibid., 3.

residential units and smaller permanent population; there would be less commercial development; and, a greater percentage of the site (although fewer acres) would be preserved in open space.

Major issues raised repeatedly in SEIS Scoping and DSEIS comments emphasized potential impacts of proposed development on the natural environment; rural character/scenic experience; public infrastructure, services, and facilities; and economic and fiscal conditions. The conclusions of the DSEIS and FSEIS analyses on these topics for SEIS Alternative 6 are highlighted below; impact comparisons are relative to SEIS Alternative 5.

### **Natural Environment**

SEIS Alternative 6 would result in:

- substantial but less clearing and grading and associated potential for erosion and sedimentation;
- no significant impacts to geologic hazards, mostly because development would be located outside of these areas (similar to SEIS Alternative 5)
- substantial but less impervious surface area and potential for pollution and other impacts on surface and groundwater;
- no direct impacts to water resources, including the Cle Elum River and on-site wetlands and their buffers;
- adequate water supply through existing water rights to serve the project (similar to SEIS Alternative 5); and,
- a larger percentage of the site maintained in open space.

### **Rural Character/Scenic Experience**

SEIS Alternative 6 would result in:

- conversion of a vacant, largely forested site to urban mixed-use development, consistent with its location in the Cle Elum UGA and its mixed-use zoning (similar to SEIS Alternative 5);
- less residential and commercial development/lower density;
- development of an RV resort;
- construction activities that could be visible or noticeable from surrounding roadways but would occur over a shorter buildout period;
- no significant land use conflicts due to the proposed layout of land uses, proposed open space and buffers incorporated into the site plans, and existing physical barriers within and adjacent to the site (similar to SEIS Alternative 5);
- views of on-site development and visual change that would be limited or blocked by preserved vegetation, topography, and distance to development (similar to SEIS Alternative 5);

- fewer new light sources occurring onsite due to less permanent development; however, the RV resort would be a source of light, particularly during the peak visitor season; and,
- new light sources onsite that would be limited or obscured by preserved vegetation and topography and implementation of Dark Sky provisions (similar to SEIS Alternative 5).

### **Public Infrastructure, Services, & Facilities**

SEIS Alternative 6 would result in:

- substantial but less additional permanent population, plus temporary population from the RV resort;
- less demand for public services (police, fire/EMS, emergency dispatch, hospitals, and schools) due primarily to less permanent population; the RV visitor population and second/vacation homes would not impact schools;
- fewer construction-related traffic impacts, such as the number of truck trips, due to the manufacturing of homes offsite and less grading/hauling;
- an increase in traffic volumes and congestion on area roadways (similar to SEIS Alternative 5); and,
- less demand for water, sewer, and solid waste services due to less development and the type of development (including the RV resort and second/vacation homes).

### **Economic & Fiscal Conditions**

SEIS Alternative 6 would result in:

- fewer local construction jobs due to fewer residential units and the manufacturing of homes off-site;
- fewer new permanent employees at full buildout due to the smaller commercial space on the adjacent property;
- revenues that would exceed costs for the City of Cle Elum at buildout; however, fiscal surpluses in the City would be lower; small fiscal shortfalls would occur in earlier years for the possible commercial development and fiscal shortfalls would occur post buildout for the RV resort and residential development;
- costs to Hospital District No. 2 and KITTCOM that would be slightly higher due to timing variations of development and when additional employees would be needed; and,
- less revenue generated for the School District, but also lower staffing costs due to fewer residents and students.

**Table 1-1** summarizes the impacts of the alternatives in greater detail.

**Table 1-1  
IMPACT SUMMARY TABLE**

<b>SEIS Alternative 5</b>	<b>SEIS Alternative 6</b>
<b>3.1 EARTH</b>	
<ul style="list-style-type: none"> <li>• SEIS Alternative 5 would result in approximately 403 acres of clearing onsite.</li> <li>• SEIS Alternative 5 would require approximately 644,000 CY of cut and 420,000 CY of fill.</li> <li>• Potential construction impacts (e.g., erosion and sedimentation) could occur from site preparation, structural fill placement, and foundations construction.</li> <li>• All of the on-site areas classified as erosion, steep slope, and landslide hazard areas would be located outside of the areas proposed for development. The risk of liquefaction within the proposed development area during seismic events, as well as the risk of coal mine hazard and subsidence of underground mine workings is considered low.</li> </ul>	<ul style="list-style-type: none"> <li>• SEIS Alternative 6 would result in approximately 315 acres of clearing onsite.</li> <li>• SEIS Alternative 6 would require approximately 351,000 CY of cut and 310,000 CY of fill.</li> <li>• Potential construction impacts could occur but would be less due to less proposed development onsite.</li> <li>• Impacts to geotechnical hazards (erosion, steep slope, landslide, seismic, and coal mine) would be similar.</li> </ul>
<b>3.2 WATER QUANTITY &amp; QUALITY</b>	
<ul style="list-style-type: none"> <li>• No direct construction impacts to water resources are anticipated; however, a new wetland was identified subsequent to the 2002 Cle Elum UGA EIS, and the Master Site Plan for SEIS Alternative 5 would impact the new wetland.</li> <li>• Clearing and grading operations could result in erosion and sedimentation of surface water runoff, and could also deliver fine sediments, accidental spills of petroleum products, and/or construction waste such as concrete leachate to the Cle Elum River by way of the underlying alluvial aquifer.</li> <li>• A permanent stormwater management system would be installed onsite and significant impacts to surface water resources are not anticipated. Infiltration would be the primary form of stormwater management; potential water quality impacts to groundwater would also be mitigated by incorporating water quality</li> </ul>	<ul style="list-style-type: none"> <li>• No direct construction impacts to water resources are anticipated under SEIS Alternative 6, including to the new wetland.</li> <li>• The potential for erosion and sedimentation, and other pollution of surface waters would be less because there would be less clearing and development onsite, and development would include temporary stormwater management that would comply with current regulations.</li> <li>• Like SEIS Alternative 5, a permanent stormwater management system would be installed that would comply with current regulations. Also, like SEIS Alternative 5, infiltration would be the primary form of stormwater management. A water balance analysis determined that the project would not impact groundwater quantity. Potential water quality impacts to groundwater</li> </ul>

SEIS Alternative 5	SEIS Alternative 6
<p>treatment into the stormwater management system.</p> <ul style="list-style-type: none"> <li>Sufficient water rights are now available to serve SEIS Alternative 5, as well as full buildout of Suncadia, and significant impacts to water supply are not anticipated.</li> </ul>	<p>would be mitigated by infiltration of stormwater and water quality treatment.</p> <ul style="list-style-type: none"> <li>Like SEIS Alternative 5, sufficient water rights are available to serve SEIS Alternative 6 and Suncadia. However, there would be fewer residential units and commercial development that would result in less domestic water use.</li> </ul>
<b>3.3 PLANTS, ANIMALS, &amp; WETLANDS</b>	
<ul style="list-style-type: none"> <li>A total of 524 acres (48% of the site) would be retained in largely forested open space under SEIS Alternative 5</li> <li>SEIS Alternative 5 would reduce the vegetation onsite which would cause fragmentation, alteration, and removal of wildlife habitat.</li> <li>Subsequent to the 2002 Cle Elem UGA EIS, a new wetland was identified (Wetland 6). Development under SEIS Alternative 5 would impact Wetland 6 and its buffer.</li> <li>Stormwater runoff would be collected and treated in accordance with applicable regulations and no impacts to fish or fish habitat in the Cle Elum or Yakima Rivers are expected.</li> <li>SEIS Alternative 5 would convert existing forest areas to urban uses but a large portion of the site would be maintained in open space (48% of the site), including along the Cle Elum River corridor. No impacts to threatened, endangered, or sensitive plants are anticipated.</li> <li>SEIS Alternative 5 would result in the displacement of wildlife and wildlife habitat within the development areas. Development would not substantially affect threatened, endangered, or sensitive wildlife species. Priority species, such as elk, could be minimally impacted.</li> </ul>	<ul style="list-style-type: none"> <li>A total of 477 acres (58% of the site) would be retained in largely forested open space under SEIS Alternative 6.</li> <li>SEIS Alternative 6 would result in essentially the same vegetation reduction and associated habitat impacts.</li> <li>SEIS Alternative 6 would result in no direct impacts to wetlands and their buffers.</li> <li>Like SEIS Alternative 5, stormwater would be collected and treated in accordance with current regulations and no fish or fish habitat impacts are expected.</li> <li>SEIS Alternative 6 would convert forest areas to urban uses but would maintain a larger percentage of the site in open space (58% of the site), including along the river corridor. No impacts to endangered, threatened, or sensitive plants are anticipated.</li> <li>Like SEIS Alternative 5, SEIS Alternative 6 would result in displacement of wildlife and habitat, but would not substantially affect endangered, threatened, or sensitive wildlife species. Priority species, such as elk, could be minimally impacted.</li> </ul>
<b>3.4 AIR QUALITY</b>	
<ul style="list-style-type: none"> <li>Demolition and construction under SEIS Alternative 5 would generate dust and emissions from construction activities. Construction would comply with applicable regulations but could still</li> </ul>	<ul style="list-style-type: none"> <li>SEIS Alternative 6 would result in dust and emissions, but at a reduced level due to fewer residential units, a shorter buildout period (7 years for 47° North, and 17 years for the adjacent</li> </ul>



SEIS Alternative 5	SEIS Alternative 6
<p>cause temporary localized impacts over the 30-year buildout.</p> <ul style="list-style-type: none"> <li>Operational air quality impacts under SEIS Alternative 5 would occur from transportation-related sources, heating, and wood-burning. Tailpipe emissions would be the major source of air pollutants. However, since the site is located in an attainment area for criteria pollutants, it is unlikely that localized air pollutant concentrations could cause a hot spot or result in significant impacts.</li> <li>SEIS Alternative 5 would generate approximately 44,753 metric tons of CO<sub>2</sub>e per year by 2037 and 72,368 metric tons of CO<sub>2</sub>e per year by 2051. The GHG emissions increase would be only a small fraction (0.04%) of total statewide annual GHG emissions and no single project emits enough GHG emissions to solely influence global climate change.</li> </ul>	<p>commercial development), and construction of manufactured homes offsite.</p> <ul style="list-style-type: none"> <li>Operational air quality emissions would be generated by similar sources as under SEIS Alternative 5. Tailpipe emissions would be the major source of air pollutants but are anticipated to be less.</li> <li>SEIS Alternative 6 is anticipated to generate less GHG emissions, 35,719 metric tons of CO<sub>2</sub>e per year by 2037, and would represent a slightly smaller percentage of statewide annual GHG emissions.</li> </ul>
<b>3.5 NOISE</b>	
<ul style="list-style-type: none"> <li>Construction activities under SEIS Alternative 5 would result in temporary increases in noise from equipment and vehicle traffic and could result in temporary localized impacts to adjacent land uses.</li> <li>The primary source of operational noise under SEIS Alternative 5 would be vehicle traffic on local roadways. Increases in noise levels would range from one to four dBA (below WSDOT's threshold of 10 dBA). Noise levels exceeding WSDOT's threshold of 66 dBA were modeled to occur at two residential receivers and the existing cemetery.</li> <li>Increases in noise would also occur from additional residential and commercial uses; noise from these uses would be regulated by the Cle Elum Municipal Code and state regulations.</li> </ul>	<ul style="list-style-type: none"> <li>Construction noise and its associated impacts on adjacent land uses under SEIS Alternative 6 would be less due to less proposed development and construction of manufactured homes occurring offsite.</li> <li>Like SEIS Alternative 5, vehicle traffic would be the primary source of noise under SEIS Alternative 6; the differences in modeled noise under SEIS Alternative 6 would be negligible.</li> <li>Increases in noise from residential and commercial uses would be less due to less proposed development. RV uses would generate noise during the peak visitor season. Operational noise would be regulated by the City code and state regulations.</li> </ul>

SEIS Alternative 5	SEIS Alternative 6
<b>3.6 LAND USE</b>	
<ul style="list-style-type: none"> <li>• SEIS Alternative 5 would convert the existing undeveloped, largely forested site to a mix of urban uses, including residential, business park/commercial, recreational, and public facilities.</li> <li>• Development would result in a transition to a mix of higher intensity urban land use, consistent with the site’s location in a UGA. Residential density on the site under SEIS Alternative 5 would be 6.0 DU/acre.</li> <li>• The site layout, open space/buffers, and existing physical barriers within and adjacent to the site under SEIS Alternative 5 would limit conflicts with adjacent land uses.</li> <li>• Increases in activity levels would occur under SEIS Alternative 5 due to the increased population on the site.</li> <li>• New residents under SEIS Alternative 5 would create additional demand for goods and services which could indirectly cause pressure for commercial development. Cumulative development in the area, together with development under SEIS Alternative 5, would increase the total developed area and associated housing/population, and represent a conversion and intensification of land use in the area.</li> </ul>	<ul style="list-style-type: none"> <li>• SEIS Alternative 6 would convert the site to a mix of urban uses but would feature less residential and commercial development and would also include an RV resort.</li> <li>• Development would convert the site to higher intensity urban uses. Residential density under SEIS Alternative 6 would be less, at 4.9 DU/acre.</li> <li>• Like SEIS Alternative 5, land use conflicts are not anticipated due to the proposed site layout, the amount and location of open space/buffers, and existing physical barriers within and adjacent to the site.</li> <li>• Increases in activity levels would occur but would generally be less due to a smaller permanent residential population. However, there would be increased seasonal activity from the proposed RV resort.</li> <li>• A smaller permanent resident population would generate less demand for goods and services and create less indirect pressure for commercial development; potential commercial development on the adjacent site would also reduce any pressure. However, seasonal population from the RV resort would increase total demand. Cumulative development in the area, together with development under SEIS Alternative 6, would increase the total developed area and associated housing/population, and represent an intensification of land use in the area.</li> </ul>
<b>3.7 RELATIONSHIP TO PLANS &amp; POLICIES</b>	
<ul style="list-style-type: none"> <li>• Development under SEIS Alternative 5 would be generally consistent with relevant Washington State, Kittitas County, City of Cle Elum, and neighboring city/town (e.g., Town of Roslyn, Community of Ronald, and City of South Cle Elum) plans, policies, and regulations.</li> </ul>	<ul style="list-style-type: none"> <li>• Similar to SEIS Alternative 5, development under SEIS Alternative 6 would be generally consistent with relevant Washington State, Kittitas County, City of Cle Elum, and neighboring city/town plans, policies, and regulations.</li> </ul>

SEIS Alternative 5	SEIS Alternative 6
<b>3.8 AESTHETICS/LIGHT &amp; GLARE</b>	
<ul style="list-style-type: none"> <li>Construction activities under SEIS Alternative 5 could be visible from locations along Bullfrog Road and SR 903. However, most clearing and grading work would occur behind the site perimeter buffer and would be blocked from view.</li> <li>The primary visual impact would be the conversion of forested area to residential neighborhoods and commercial uses. Vegetated buffers on the perimeter of the site would minimize visual impacts from surrounding areas. Development would be most visible from higher vantage points.</li> <li>New light sources would be introduced to the site (including building and landscape lighting, and additional lights from vehicle traffic) and would increase the amount of visible light during the evening hours. Vegetated buffers and other mitigation (e.g., Dark Sky provisions) would minimize lighting impacts.</li> </ul>	<ul style="list-style-type: none"> <li>Construction activities could be visible from surrounding roadways but would occur over a shorter buildout period and with less development. Similar perimeter buffer would be preserved.</li> <li>Visual simulations were prepared to illustrate proposed development under SEIS Alternative 6. Although development would convert the primarily forested area to residential neighborhoods, an RV resort, and commercial uses, the proposed site layout, preserved vegetated buffers, existing landforms, and distance to development would avoid or minimize visual impacts from surrounding areas.</li> <li>New light sources would occur on the site but would be less due to less development. However, light and glare would also be generated by the RV resort, particularly during the peak visitor season. Vegetated buffers and other mitigation would minimize lighting impacts.</li> </ul>
<b>3.9 HOUSING, POPULATION, &amp; EMPLOYMENT</b>	
<ul style="list-style-type: none"> <li>Construction of SEIS Alternative 5 would occur through a combination of local and non-local construction which would result in some workers moving to the area. The largest demand for construction workers would occur during the first five years of construction.</li> <li>Under SEIS Alternative 5, the following approximate housing, population, and employment would be generated by buildout in 2051: <ul style="list-style-type: none"> <li>– 1,334 housing units</li> <li>– 2,809 permanent residents</li> <li>– 1,900 employees</li> </ul> <p>The housing and population would help the City meet its growth targets which are not caps and may understate anticipated growth.</p> </li> </ul>	<ul style="list-style-type: none"> <li>Demand for local construction workers would be less under Alternative 6 because there would be less development onsite and manufactured housing would be constructed offsite and assembled onsite.</li> <li>Under SEIS Alternative 6, the following approximate housing, population, and employment would be generated by buildout in 2037: <ul style="list-style-type: none"> <li>– 707 housing units</li> <li>– 1,489 residents</li> <li>– 409 employees</li> </ul> <p>The housing and population would help the City meet its growth targets. The RV resort would include 627 RV sites with an equivalent/proxy population (used to estimate approximate</p> </li> </ul>

SEIS Alternative 5	SEIS Alternative 6
<ul style="list-style-type: none"> <li>A 7.5-acre site would be set aside for dedication and future development of affordable housing by others under SEIS Alternative 5. The housing under SEIS Alternative 5 is expected to largely be market rate.</li> </ul>	<p>service demand) of about 941 that would not count toward the City’s growth targets.</p> <ul style="list-style-type: none"> <li>An approximate 6.8-acre site would be set aside for future affordable housing. Preliminary estimates of the monthly mortgage payment and land lease costs for the single family housing and monthly rental rates for the multi-family housing indicate that they would not be considered affordable to city/county residents earning 60% of Median Household Income. However, the housing is intended to be financially accessible for both local and public service employees.</li> </ul>
<p><b>3.10 HISTORIC &amp; CULTURAL RESOURCES</b></p>	
<ul style="list-style-type: none"> <li>Unidentified cultural resources could potentially be inadvertently impacted or destroyed with site development under SEIS Alternative 5. 23 cultural resource sites were identified in the project area in the 2002 Cle Elum UGA EIS. Most of the sites were located in the lower third of the site that would be reserved for open space, while development would occur in the upper two thirds of the site.</li> <li>Potential impacts to known cultural resources under SEIS Alternative 5 are not expected to be significant because on-site archaeological sites identified in 2002 have since been determined to be not eligible for listing on the National Register of Historic Places (NRHP) or Washington Historic Register (WHR).</li> </ul>	<ul style="list-style-type: none"> <li>Like SEIS Alternative 5, unidentified cultural resources could be impacted or destroyed with site development under SEIS Alternative 6. However, similar areas would be reserved in open space.</li> <li>Like SEIS Alternative 5, potential impacts to cultural resources are not expected to be significant because known archaeological sites that are located onsite have since be determined to be not eligible for listing on the NRHP or WHR.</li> </ul>
<p><b>3.11 PARKS &amp; RECREATION</b></p>	
<ul style="list-style-type: none"> <li>During development of SEIS Alternative 5, construction workers could choose to live in local RV campgrounds which would affect the number of sites available for recreational users.</li> <li>Increased population under SEIS Alternative 5 would result in increased demand for park and recreation facilities in Cle Elum and the site vicinity. A range of recreational facilities would be provided onsite to help meet demand, including: parks, trails, a neighborhood clubhouse, lake, and two soccer fields.</li> </ul>	<ul style="list-style-type: none"> <li>Any potential for construction workers to live in local RV campgrounds would be less due to less development overall and less on-site construction.</li> <li>Demand for parks and recreation facilities would be less due to fewer permanent residents; visitors to the RV resort would also contribute to increased demand, but demand would still be lower than under SEIS Alternative 5 because the RVs would not generate permanent population. A range of recreational facilities would be provided onsite, including: parks, trails, an</li> </ul>

SEIS Alternative 5	SEIS Alternative 6
	adventure center, and two recreation amenity centers. These facilities would generally be consistent with goals and policies in the City Parks and Recreation Plan and would meet or exceed the Plan’s targets.
<b>3.12 PUBLIC SERVICES</b>	
<ul style="list-style-type: none"> <li>• Development under SEIS Alternative 5 and its associated population would generate demand for public services (i.e., police, fire/emergency medical, medical dispatch, hospital, and school services) during the construction and operation phases.</li> <li>• SEIS Alternative 5 population would generate the following approximate need for additional public services staff at buildout in 2051, based on the project’s population<sup>5</sup>: <ul style="list-style-type: none"> <li>– 6.7 police officers (City Police Dept.)</li> <li>– 3.1 paid full-time firefighters (City Fire Dept.)</li> <li>– 6.0 EMTs and 7.4 paramedics (Hospital Dist. No. 2 Medic 1)</li> <li>– 0.7 physicians, 5.4 APCs, and 4.0 RN (Hospital Dist. No. 2 clinics in Cle Elum)</li> <li>– 1.0 physicians, 0.2 APCs, and 6.1 RNs (Hospital Dist. No. 1 in Ellensburg)</li> <li>– 0.9 dispatchers (KITTCOM)</li> <li>– 22.9 teachers based on 334 additional students (Cle Elum – Roslyn School Dist.)</li> </ul> <p>Based on the Police Dept. ICMA method, 12 police officers would be required.</p> </li> </ul>	<ul style="list-style-type: none"> <li>• SEIS Alternative 6 would generate less demand for public services due to fewer permanent residents, less commercial development, and a shorter buildout period. The RV visitors would also generate some demand for public services; however, the visitors would not impact schools.</li> <li>• SEIS Alternative 6 population would generate the following approximate need for additional public services staff at buildout in 2037, based on the project’s population<sup>6</sup>: <ul style="list-style-type: none"> <li>– 5.5 police officers (City Police Dept.)</li> <li>– 2.8 paid full-time firefighters (City Fire Dept.)</li> <li>– 5.2 EMTs and 6.4 paramedics (Hospital Dist. No. 2 Medic 1)</li> <li>– 0.6 physicians, 4.6 APCs, and 3.5 RNs (Hospital Dist. No. 2 clinics in Cle Elum)</li> <li>– 0.9 physicians, 0.2 APCs, and 5.3 RNs (Hospital Dist. No. 1 in Ellensburg)</li> <li>– 0.8 dispatchers (KITTCOM)</li> <li>– 12.1 teachers based on 177 additional students (Cle Elum – Roslyn School Dist.)</li> </ul> <p>Based on the Police Dept. ICMA method, 8 police officers would be required.</p> </li> </ul>
<b>3.13 TRANSPORTATION</b>	
<ul style="list-style-type: none"> <li>• SEIS Alternative 5 would result in temporary construction-related traffic impacts over the 30-year buildout period. Based on estimated grading, 200 to 400 trucks per month would be generated to haul grading materials.</li> <li>• SEIS Alternative 5 would increase traffic volumes and congestion on area roadways (e.g., in the City, County, and on state facilities such as SR</li> </ul>	<ul style="list-style-type: none"> <li>• SEIS Alternative 6 would result in temporary construction-related traffic impacts over the 17-year buildout period. Based on estimated grading, approximately 200 trips per month would be generated to haul grading materials.</li> <li>• Like SEIS Alternatives 5, SEIS Alternative 6 would increase traffic volumes and congestion on area roadways.</li> </ul>

<sup>5</sup> Assumes that all the residential units are primary homes.

<sup>6</sup> Ibid., 5.

SEIS Alternative 5	SEIS Alternative 6
<p>903, SR 907, and I-90); this is an unavoidable effect of urban development.</p> <ul style="list-style-type: none"> <li>The following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 with future Baseline conditions, and continue to operate at non-compliant LOS with SEIS Alternative 5: <ul style="list-style-type: none"> <li>#8 - Ranger Station Rd / Miller Ave / W 2<sup>nd</sup> Street (SR 903)</li> <li>#11 – Douglas Munro Blvd / W 1<sup>st</sup> Street</li> <li>#12 – N Pine Street / W 1<sup>st</sup> Street</li> <li>#13 – N Stafford Ave / W 2<sup>nd</sup> Street (SR 903)</li> <li>#15 – N Oakes Ave / W 2<sup>nd</sup> Street (SR 903)</li> </ul> </li> <li>The following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 as a result of the additional traffic generated by SEIS Alternative 5: <ul style="list-style-type: none"> <li>#2 - Bullfrog Road / I-90 WB Ramps</li> <li>#3 - Bullfrog Road / Tumble Creek</li> <li>#7 - Denny Ave / W 2<sup>nd</sup> Street (SR 903)</li> <li>#9 - N Pine Street / W 2<sup>nd</sup> Street (SR 903)</li> <li>#15 - N Oakes Ave / W 2<sup>nd</sup> Street (SR 903)</li> <li>#17 - Pennsylvania / 2<sup>nd</sup> Street</li> <li>#21 - Pennsylvania Ave / N 1<sup>st</sup> Street (SR 903) in Roslyn</li> <li>#30 - SR 903 / Site Access Connector Road</li> </ul> <p>Additional study intersections are expected to operate at non-compliant LOS during the Friday and Sunday summer PM peak hour as a result of project traffic.</p> </li> <li>Increased traffic volumes on area roadways from SEIS Alternative 5 could result in moderate increases in accident rates; however, none of the study intersections were identified as high accident locations.</li> </ul>	<ul style="list-style-type: none"> <li>The same study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 with future Baseline conditions and would continue to operate at non-compliant LOS with SEIS Alternative 6.</li> <li>The following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 as a result of the additional traffic generated by SEIS Alternative 6: <ul style="list-style-type: none"> <li>#1 - Bullfrog Road / I 90 EB Ramps</li> <li>#2 - Bullfrog Road / I-90 WB Ramps</li> <li>#3 - Bullfrog Road / Tumble Creek</li> <li>#7 - Denny Ave / W 2<sup>nd</sup> Street (SR 903)</li> <li>#9 - N Pine Street / W 2<sup>nd</sup> Street (SR 903)</li> <li>#15 - N Oakes Ave / W 2<sup>nd</sup> Street (SR 903)</li> <li>#21 - Pennsylvania Ave / N 1<sup>st</sup> Street (SR 903) in Roslyn</li> <li>#30 - SR 903 / Site Access Connector Road</li> </ul> <p>Additional study intersections are expected to operate at non-compliant LOS during the Friday and Sunday summer PM peak hour as a result of project traffic.</p> </li> <li>Like SEIS Alternative 5, traffic volumes on area roadways due to SEIS Alternative 6 could result in moderate increases in accident rates.</li> </ul>

SEIS Alternative 5	SEIS Alternative 6
<ul style="list-style-type: none"> <li>New trails and sidewalks would be provided throughout the site and would connect with off-site trails.</li> </ul>	<ul style="list-style-type: none"> <li>An approximately 6-mile network of non-motorized trails and sidewalks would be provided throughout the site that would connect with off-site trails.</li> </ul>
<b>3.14 UTILITIES</b>	
<ul style="list-style-type: none"> <li>SEIS EIS Alternative 5 would generate demand for water, sewer, and solid waste service during construction and operation of the project. The City of Cle Elum would provide water and sewer service, Waste Management of Ellensburg would provide solid waste service.</li> <li>Solid waste would be generated during construction of SEIS Alternative 5.</li> <li>At buildout under SEIS Alternative 5, average daily treated water demand would range from 0.31 to 0.50 MGD. The City Water System would require the following improvements to serve the project together with other approved/vested projects: <ul style="list-style-type: none"> <li>New filtration train in the Water Treatment Plant</li> <li>New Zone 3 finished water pump</li> <li>New Zone 3 reservoir storage</li> </ul> </li> <li>At buildout, monthly wastewater flow would range from 0.26 to 0.30 MGD under SEIS Alternative 5. The City Wastewater Treatment Plant (WWTP) has adequate capacity to serve the project.</li> <li>SEIS Alternative 5 is estimated to generate approximately 2,885 tons of solid waste per year at buildout. Improvements to the Cle Elum Transfer Station could be required to increase the station's capacity and serve the project. However, Kittitas County Solid Waste has not identified any plans to improve the transfer station/build a new transfer station, and the current property owner has been making payments for transfer station improvements.</li> </ul>	<ul style="list-style-type: none"> <li>SEIS Alternative 6 would generate demand for water, sewer and solid waste service during construction and operation; the same entities would provide service.</li> <li>Solid waste generated during construction of SEIS Alternative 6 would be less due to less on-site construction and less overall population.</li> <li>At buildout under SEIS Alternative 6, average daily treated water demand would range from 0.16 to 0.31 MGD. The same improvements to the City Water System would be required as under SEIS Alternative 5.</li> <li>At buildout, monthly wastewater flow would range from 0.19 to 0.21 MGD under SEIS Alternative 6. Like SEIS Alternative 5, the City WWTP has adequate capacity to serve the project.</li> <li>SEIS Alternative 6 would generate approximately 2,335 tons of solid waste per year at buildout. Like SEIS Alternative 5, improvements to the Cle Elum Transfer Station could be required to increase the station's capacity and serve the project.</li> </ul>

SEIS Alternative 5	SEIS Alternative 6
<b>3.15 FISCAL &amp; ECONOMIC CONDITIONS</b>	
<ul style="list-style-type: none"> <li>SEIS Alternative 5 is anticipated to create demand for approximately 2,025 local construction jobs over full buildout.</li> <li>Operational economic impacts of SEIS Alternative 5 would include increased employment opportunities, higher potential personal income, lower unemployment, and new business commerce.</li> <li>Development of SEIS Alternative 5 commercial (business park) uses would increase permanent employment by approximately 1,900 new employees at full buildout.</li> <li>SEIS Alternative 5 would generate revenues to the City of Cle Elum that would exceed costs (including for police, fire, parks, and public works services), which would create fiscal surpluses for the City over the course of the project and at full buildout.</li> <li>Costs to provide police service would be greater using the ICMA method than using to officer/population method.</li> <li>The public service purveyors' (e.g., Hospital District No. 2, KITTCOM, and Cle Elum-Roslyn School District) costs could exceed revenues to serve SEIS Alternative 5; however, mitigation may or may not be required, as the purveyors have a number of funding sources. Individual mitigation agreements with the public service purveyors could be executed.</li> </ul>	<ul style="list-style-type: none"> <li>SEIS Alternative 6 would create demand for approximately 607 local construction jobs, which is less due to fewer residential units and the manufacturing of homes offsite.</li> <li>Operational economic impacts under SEIS Alternative 6 would be similar to under SEIS Alternative 5 and are expected to be positive. Increased site population would result in increased retail spending but would be less due to fewer permanent residents. Future commercial development on the adjacent 25-acre site could also provide new offerings that could compete with existing businesses.</li> <li>Development of SEIS Alternative 6 (including future commercial development) would result in approximately 400 new permanent employees at full buildout.</li> <li>SEIS Alternative 6 would generate revenues to the City that would exceed costs, but fiscal surpluses would be lower than SEIS Alternative 5. The SEIS Alternative 6 possible commercial development could generate small fiscal shortfalls in earlier years while the SEIS Alternative 6 residential and RV resort could generate fiscal shortfalls post buildout.</li> <li>Similar to SEIS Alternative 5, costs to provide police service would be greater using the ICMA method.</li> <li>Costs to Hospital District No. 2 and KITTCOM under SEIS Alternative 6 would be slightly higher than under SEIS Alternative 5 due to timing variations of development and when additional employees would be needed. SEIS Alternative 6 would generate less revenue for the School District due to less development but would also generate lower staffing costs due to fewer residents onsite. Similar to SEIS Alternative 5, mitigation may or may not be required, as the purveyors have a number of funding sources. Mitigation agreements could also be executed.</li> </ul>



## 1.4 MITIGATION MEASURES & SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The following section lists the mitigation measures that were identified in the DSEIS and FSEIS to address the significant adverse impacts of the SEIS Alternatives. Where significant impacts from construction and operation of the SEIS Alternatives cannot be mitigated by known mitigation measures, significant unavoidable adverse impacts are noted. The mitigation measures are separated into several categories, as described below.

- **Proposed Mitigation Measures (Included in the Project)** are measures which the Applicant has preliminary proposed, that are included in the proposed Master Site Plan in the pre-application materials submitted to the City, and that are above and beyond the “Required Mitigation Measures” described below. These measures include certain conditions of approval from the 2002 Bullfrog Flats Development Agreement. The conditions in the Development Agreement were developed to mitigate the environmental impacts of the Bullfrog Flats Master Site Plan and arose from the 2002 Cle Elum UGA Final EIS and various other approval processes for the project. Because of the time that has passed since the Development Agreement was executed, and the lack of complete documentation, the reasons for certain of the conditions or some specific requirements is not clear. Also, certain of the conditions no longer apply because they have been performed (e.g., certain properties have already been dedicated to the City). Therefore, only the conditions of approval that pertain to the current proposal, and which the Applicant has preliminarily agreed to include in the project, are listed with appropriate modifications. These measures are not included in the project at this point, as a formal Master Site Plan Amendment application has not been submitted to the City. As such, they are represented with the verb “should” in this FSEIS to indicate a condition recommended by the City.
- **Required Mitigation Measures** are measures required by code, laws, or local, state, and federal regulations.
- **Approved Bullfrog Flats Conditions of Approval (Not Included in the Project)** are measures that are based on the conditions of approval contained in the 2002 Development Agreement. These are the conditions that are not certain to apply to SEIS Alternative 6 and will depend on changes to the adopted Development Agreement that may be proposed. These measures are not included in the project at this point, as a formal Master Site Plan Amendment application has not been submitted to the City. As such, they are represented with the verb “should” in this FSEIS to indicate a condition recommended by the City.

- **Other Possible Mitigation Measures** are other measures identified by the SEIS team and the City that could be implemented to further reduce the impacts of SEIS Alternative 6.

The mitigation measures listed in the FSEIS will serve as a basis for development conditions that the City may impose in conjunction with approval of a new or updated Development Agreement for the proposed 47° North Master Site Plan Amendment.

## **Earth**

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### **Required Mitigation Measures**

#### **Structural Standards**

- The Cle Elum Municipal Code includes performance standards for development in geologically hazardous areas (CEMC 18.01.070 (F)) that would be followed for development on the 47° North site. These standards include the following:
  - Structures and improvements shall minimize alterations to the natural contour of the slope, and foundations shall be tiered where possible to conform to the existing topography;
  - Structures and improvements shall be located to preserve the most critical portion of the site and its natural landforms and vegetation;
  - The proposed development shall not result in greater risk or a need for increased buffers on neighboring properties; and,
  - Development shall be designed to minimize impervious surfaces within the critical area and critical area buffer.

#### **Erosion Hazards**

- A Temporary Erosion and Sediment Control (TESC) and Stormwater Pollution Prevention Plan (SWPPP) would be developed for the project and erosion and sedimentation control Best Management Practices (BMPs) would be implemented during construction as described in the 2019 *Washington State Department of Ecology Manual for Eastern Washington* (2019 Ecology Manual). BMPs may include but are not limited to the following:
  - Use of stabilized construction entrances;
  - Stabilization of construction roads and parking areas;
  - Applying water to exposed soil surfaces to control dust;
  - Use of wheel washes for construction traffic leaving the site;
  - Use of sediment traps and inlet/outlet controls where applicable;
  - Use of perimeter silt fencing; and,
  - Use of temporary cover measures such as sheet plastic, mulch, and hydroseed.

- During construction, monitoring of erosion and sediment control by a Certified Erosion and Sediment Control Lead would be required for the project by Ecology.

### Landslide Hazards

- Foundation setbacks for buildings and other structures would comply with criteria established in Section 1808.7 of the 2015 *International Building Code* (IBC), including:
  - For foundations located adjacent to the top of steep (> 33.3%) slopes, the face of the foundations would be set back from the steep slope a distance equal to or greater than the lesser of 40 feet or  $H/3$  where “H” is equal to the height of the steep slope; and,
  - For structures located adjacent to the toe of a steep (> 33.3%) slopes, the face of the structures would be set back from the toe of the steep slope a distance equal to or greater than the lesser of 15 feet or  $H/2$  where “H” is equal to the height of the steep slope.
- Placement of structural fill would be avoided on or adjacent to the top of steep (greater) than 40% slopes.
- Permanent cut or fill slopes would not exceed a maximum inclination of 50%.
- Infiltration facility setbacks from steep slopes would comply with requirements outlined in the 2019 Ecology Manual. Specifically, the 2019 Ecology Manual requires that infiltration ponds be set back from the top of a slope of 15% or steeper at a distance equal to or greater than the height of the slope. The 2019 Ecology Manual allows for lesser or greater setbacks where a comprehensive site assessment concludes that the alternate setback is justified based on the site conditions. Slopes in excess of 15% exist on the adjacent 25-acre commercial property and on the municipal/community recreation center site. Siting of infiltration facilities in these areas would consider the slope setback requirements of the 2019 Ecology Manual.

### **Other Possible Mitigation Measures**

#### Coal Mine Hazards

- Although there is low risk for coal mine hazard impacts, mitigation of this risk could be achieved by using building methods and construction materials that would reduce the risk of structural damage, such as:
  - Reinforce concrete foundations supporting a flexible superstructure (e.g., wood framing or other flexible building materials);
  - Use flexible (asphalt) pavement for road construction; and,

- Use flexible pipes, couplings, and fittings for underground utilities.

### **Significant Unavoidable Adverse Impacts**

Significant amounts of earthwork would be required for development of the SEIS Alternatives, similar to other urban master plan projects, and are unavoidable. However, with implementation of the mitigation measures listed above, no significant unavoidable adverse earth-related impacts are anticipated.

## **Water Quantity & Quality**

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### **Proposed Mitigation Measures (Included in the Project)**

- Proposed development under the revised Master Site Plan **should** not directly impact any on or off-site water resources (e.g., wetlands and streams). No mitigation is warranted.

### **Bullfrog Flats Conditions of Approval (Included in the Project)**

- Sufficient water rights are available from New Suncadia to supply water for proposed development of the 47° North site and the adjacent 25-acre property. New Suncadia and Ecology signed an agreement in December 2015 regarding how they would use their water rights and their mitigation obligations, including putting water rights into Ecology’s Trust Water Rights Program and transferring water rights to the City of Cle Elum. The transfer of water rights to the City is pending.

### **Required Mitigation Measures**

- Temporary stormwater management measures would be implemented that would follow the BMPs and requirements of the Construction SWPPP and the currently active National Pollutant Discharge Elimination System (NPDES) Permit (No. WA0052361) for the project.
- A Master Drainage Plan would be prepared and implemented, consistent with the 2019 Ecology Manual.
- Stormwater Infiltration facilities would be sited to avoid increasing the potential for landslides in any steep slope or landslide hazard areas.
- Design-level exploration and infiltration testing would be performed for the proposed infiltration ponds to assess suitable infiltration rates for infiltration facility design, as described in the 2019 Ecology Manual.

### **Significant Unavoidable Adverse Impacts**

Impacts on water quality or wetlands under the SEIS Alternatives, if any, would be short term, with no significant broad, enduring, or cumulative effects. If inadvertent isolated and localized releases of turbid water or petroleum products does occur during construction, significant water quality impacts could result. However, with implementation of the proposed TESC plan and SWPPP, these impacts could be avoided.

Heavy metals, landscape chemicals, and fecal coliforms would increase in stormwater runoff with the proposed urban development, even after treatment by BMPs. With the proposed permanent water quality treatment facilities, no adverse impacts to water resources are anticipated.

No significant water supply impacts are expected because the water rights that are now owned by New Suncadia, and will be conveyed to the City, are adequate to provide water to development of both the Suncadia resort and the 47° North site; would mitigate consumptive use by induced off-site development caused by Suncadia development; would mitigate consumptive use resulting from development of the fallowed land formally irrigated; and, would place water in Ecology's Trust Water Rights Program for instream flow purposes and for purchase for new development by third parties within certain portions of the rule area.

### **Plants, Animals, & Wetlands**

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#### **Proposed Mitigation Measures (Included in the Project)**

- No direct impacts to wetlands or the Cle Elum River should occur. The riparian wetlands along the Cle Elum River should be retained within dedicated open space that would encompass their required buffers and the entire river corridor, as well as additional forest habitat. Isolated Wetlands 4, 5, and 6 and their buffers should be retained in an open space tract.
- Conservation easements that were granted for the Managed Open Space and River Corridor Open Space onsite by Trendwest to the Kittitas Conservation Trust should remain in effect with the proposed project.
- The proposed landscaping onsite should generally consist of natural, local, and drought tolerant plants, including hydroseed mixes that could include wildflowers, but not any plants considered to be noxious weeds – a Noxious Weed Plan should be prepared to ensure that such plants are not planted. Imported soil materials should also be weed-free. The use of native plant material could benefit wildlife.

### Bullfrog Flats Conditions of Approval (Included in the Project)

- With respect to overall fish and wildlife habitat, the project should include those provisions in the Cooperative Agreement between Trendwest (now New Suncadia), Washington State Department of Fish and Wildlife (WDFW), and the Yakama Nation that apply to potential cumulative impacts from the Suncadia resort and development of the 47° North and adjacent 25-acre property. This could include the City of Cle Elum enforcing use and access restrictions in designated areas, especially within the Cle Elum River open space, to minimize disturbance to fish and wildlife during mating and breeding seasons.

### Required Mitigation Measures

- The 47° North project would adhere to the City of Cle Elum critical areas ordinance and Shoreline Master Program regulations regarding avoidance and minimization of impacts, as well as buffer requirements and protection of fish and wildlife habitat conservation areas.
- Construction limits, including staging areas, would be clearly marked in the field prior to beginning construction activities.
- The limits of wetland buffer areas would be clearly marked on construction plans and in the field to prevent unauthorized damage to critical areas during construction.
- Construction staging areas would be located outside of wetland buffers within the RV resort area to minimize impacts to vegetation.
- Any wetland buffer areas temporarily disturbed for construction access and staging would be revegetated with a mixture of native plant species following completion of construction activities, pursuant to an approved mitigation plan.
- Vehicle re-fueling and maintenance activities would be avoided within wetland buffers, or within at least 100 feet of wetlands.
- Appropriate BMPs and TESC measures would be implemented in accordance with an approved SWPPP, consistent with standards of the 2019 Ecology Manual, including specific measures to prevent and control spills of pollutants, and to handle, control, and store potential contaminants and their potential to damage surface waters and fisheries resources.
- A permanent stormwater management system would be designed and installed consistent with the 2019 Ecology Manual and applicable City of Cle Elum development

regulations in place at the time of permitting for project. Operation of this system would avoid and minimize the potential for impacts on surface waters and fisheries resources.

- As necessary, clean stormwater runoff would be directed to the wetland's catchment area to retain the wetland hydrology.

### **Other Possible Mitigation Measures**

- Where feasible, conservation easements could be conveyed to additional large forested open space areas across the site – beyond those associated with the Cle Elum River corridor – which would enable these areas to be managed for healthy forests and wildlife habitat in coordination with recreational uses.
- To address impacts of increased angler fishing pressure on fisheries resources and habitat, WDFW is expected to continue to manage the regional fishery. They would continue to monitor fishing in the Cle Elum and Yakima Rivers and evaluate local fish populations. If problems were identified, the WDFW would likely implement selective gear rules in affected areas. If fish populations continued to decline, WDFW could apply catch and release regulations in additional areas, narrow the fishing season, or as a last resort enact closures.
- To mitigate impacts of increased fishing pressure on fisheries resources with proposed development, the Applicant could: 1) explore angler management options with the WDFW and Yakama Nation, such as increased angler education, dispersing angling pressure to underused areas, and providing alternatives to traditional fishing opportunities; 2) implement creel surveys (coordinated with WDFW) to address issues directly related to angler fishing presence; and/or 3) implement fish population surveys (coordinated with WDFW to assess quantitative changes in discrete stream reaches).
- Hiking trails could be located outside the Cle Elum River corridor so that elk viewing would be possible without traversing the elk habitat. Elk viewing areas could be established.
- Bear-proof garbage receptacles, well-signed natural areas, informational signage about the risks associated with living near natural areas, well-marked common road crossings, well-marked speed limits, and environmental education and outreach could be implemented to help minimize human/wildlife conflicts.
- A potential measure could be included in the Land Stewardship Plan or in another agreement to develop a plan to manage retained open space areas to better facilitate elk, which could help reduce their impacts elsewhere.

### **Significant Unavoidable Adverse Impacts**

No significant impacts to wetlands, aquatic, or fish habitat are expected. Development of the site under the SEIS Alternatives would result in the following unavoidable adverse impacts:

- Removal of a substantial area of the existing native vegetation and soils and replacement by non-native communities or impervious surfaces; retained native vegetation communities among the various development areas would become primarily edge habitat;
- A reduction in the local populations of most native wildlife species in the area, and continuation of a shift in species composition to favor species more adapted to urban environments; those animals displaced from the site would likely perish; and,
- An increase in disturbance of adjoining areas of native forest and riparian habitat and on adjacent lands as a result of increased human activity including vehicular traffic.

Such impacts are typical and unavoidable in the context of urban development.

No additional significant unavoidable adverse impacts to plants and animals, or wetlands would likely occur under SEIS Alternative 6 with implementation of the mitigation measures listed above.

### **Air Quality/Greenhouse Gas Emissions**

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#### **Proposed Mitigation Measures (Included in the Project)**

- Construction Emission Control: All contractors should be required to implement air quality control plans for construction activities. Air quality control plans should include BMPs to control fugitive dust and odors such as:
  - Use water sprays or other non-toxic dust control methods on unpaved roadways;
  - Minimize vehicle speed while traveling on unpaved surfaces;
  - Prevent track-out of mud onto public streets;
  - Cover soil piles when practicable; and,
  - Minimize work during periods of high winds when practicable.
- The following mitigation measures should be used to minimize air quality and odors issues caused by construction equipment tailpipe emissions:
  - Maintain the engines of construction equipment according to manufacturers' specifications;
  - Minimize idling of equipment while the equipment is not in use; and,
  - If there is heavy traffic during some periods of the day, schedule haul traffic during off-peak times (e.g., between 9:00 AM and 4:00 PM) when it would have



the least effect on traffic and would minimize indirect increases in traffic-related emissions.

- Single family and some of the multi-family residences under SEIS Alternative 6 should consist of manufactured housing, which research has shown, can result in reduced construction-related GHG emissions compared with stick-built houses.
- Wood-burning stoves should not be permitted in the proposed residences.
- Wood-fueled campfires should not be permitted in the RV resort area.

### **Required Mitigation Measures**

- Construction and development would comply with applicable air quality regulations, including:
  - National Ambient Air Quality Standards (NAAQS);
  - State Ambient Air Quality Standards;
  - Ecology’s Indoor Burning Smoke Reduction Zone regulatory framework;
  - State and City of Cle Elum outdoor burning regulations; and,
  - State of Washington GHG laws.

### **Other Possible Mitigation Measures**

- The Applicant should consider using energy efficient lighting in the project.
- The use of solar energy could be considered and analyzed further.

### **Significant Unavoidable Adverse Impacts**

No significant unavoidable adverse impacts on regional or local air quality are anticipated due to construction activities under the SEIS Alternatives. Temporary, localized dust and odor impacts could occur during construction. The regulations and measures identified above are anticipated to mitigate any potential adverse construction air quality impacts.

No significant unavoidable adverse operational impacts on regional or local air quality are anticipated under the SEIS Alternative. The 47<sup>o</sup> North site is located within an air quality attainment area for all criteria air pollutants and the project is not expected to pose issues related to air toxics.

Although no threshold of “significance” has been established by state law to determine GHG impacts, modeled GHG emissions related to the project in 2037 would be negligible relative to the forecasted total statewide annual GHG emissions.

## **Noise**

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### **Proposed Mitigation Measures (Included in the Project)**

- A large portion of the site should be preserved in undeveloped, forested/vegetated open space. Forested/vegetated areas and buffers that should be retained and possibly enhanced along the site boundary would assist in reducing noise impacts on surrounding uses.

### **Bullfrog Flats Conditions of Approval (Included in the Project)**

- Construction should be limited to 7:00 AM to 7:00 PM, Monday through Saturday. Sunday construction should be on an emergency basis only and would need to be approved by the City.
- All construction equipment should have adequate mufflers, intake silencers, and engine enclosures to minimize construction equipment noise.
- Any stationary equipment that generates noise should be located away from sensitive receivers, including residential uses, the school property, the cemetery, and open space areas.
- Equipment servicing and maintenance times should be unrestricted. The City may review and approve case-by-case exceptions to this condition if justified to comply with Washington State Department of Natural Resources industrial restrictions.

### **Required Mitigation Measures**

- Construction and operation of the project would be generally consistent with numerous Cle Elum Municipal Code requirements related to noise, including Chapter 2.48.130, Chapter 8.12.020, Chapter 10.20, Chapter 10.24.020, and Chapter 17.51.010. The CEMC, however, is focused primarily on nuisances and does not address or provide numerical thresholds for construction, transportation, or operational noise. As such, Washington State noise regulations would apply where the CEMC has not established noise thresholds.
- Consistent with the Cle Elum Municipal Code, the proposed RV resort would be required to submit a management plan, including rules governing park quiet hours, as part of the conditional use permit process or Development Agreement.
- Roof equipment in the commercial development could require noise baffling, if necessary, to meet state noise standards. This condition will be reviewed and any baffling requirements imposed as part of the building permit review for the commercial buildings.

### **Other Possible Mitigation Measures**

- Construction noise could be reduced by using enclosures or walls to surround noisy stationary equipment, substituting quieter equipment or construction methods, and minimizing time of operation. To reduce construction noise at nearby receiver locations, the following mitigation measures could be incorporated into construction plans and contractor specifications:
  - Erect portable noise barriers around loud stationary equipment located near sensitive receivers;
  - Turn off idling construction equipment;
  - Require contractors to rigorously maintain all equipment; and,
  - Train construction crews to avoid unnecessarily loud actions (e.g., dropping bundles of rebar onto the ground or dragging steel plates across pavement) near noise-sensitive areas.

### **Significant Unavoidable Adverse Impacts**

Noise levels would increase in the study area due to short-term clearing/grading, demolition and construction noise, and long-term traffic and human noise. The noise from the proposed residential, commercial, and parks/recreational uses is expected to be minor; with implementation of the mitigation measures listed above, no significant impacts are expected.

## **Land Use**

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### **Proposed Mitigation Measures (Included in the Project)**

- Approximately 477 acres (58% of the site) **should** be retained in open space, including critical areas such as the Cle Elum River, wetlands, and steep slopes. Existing easements are in place to protect the River Corridor Open Space and Managed Open Space in the western portion of the site. These easements **should** be retained by New Suncadia or transferred to the Applicant (Sun Communities).

### **Approved Bullfrog Flats Conditions of Approval (Included in the Project)**

- A minimum of 10 acres **should** be set aside and dedicated to the City for future expansion of the Laurel Hill Memorial Cemetery.
- Natural open space buffers at least 100 feet wide **should** be maintained along Bullfrog Road. In addition, undeveloped, forested open space **should** be preserved onsite within the northeastern quadrant of the Bullfrog/I-90 Interchange.

### **Required Mitigation Measures**

- Mitigation measures identified through this SEIS would minimize land use impacts from construction activities, consistent with City regulations (see **DSEIS** Section 3.1, Earth,

Section 3.4, Air Quality/GHG Emissions, Section 3.5, Noise, and Section 3.13, Transportation, and FSEIS Section 3-2, **Transportation**).

- The proposed uses and land use standards would be consistent with the City of Cle Elum Comprehensive Plan and zoning for the site (see DSEIS Section 3.7, Relationship to Plans & Policies, for details). This conclusion would be verified based on submittal of the 47° North Master Site Plan application and consistency analysis contained in a staff report for the proposal.
- The 50-foot-wide platted buffer adjacent to the SR 903 right of way would be maintained with possible commercial development on the adjacent 25-acre property.

**Approved Bullfrog Flats Conditions of Approval (Not Included in the Project)**

- A useable area of 7.5 acres should be required to be conveyed to the City of Cle Elum, or another public or non-profit entity approved by the City to develop a minimum of 50 affordable housing units. The 50 housing units should not be counted towards the 1,334-unit cap for the project. The parcel or parcels should be identified and conveyed prior to approval of the 250<sup>th</sup> residential housing unit. Under the current proposal, a 6.8-acre affordable housing site has been identified; this site should be increased to meet the 7.5-acre requirement or the density increased to meet the 50 housing unit requirement.
- The current development condition applicable to the Bullfrog Flats site would only permit small-scale retail uses that would serve the convenience needs of residents and employees to be included on the commercial site. Retail uses would be limited to 10% of the floor area of the commercial development, and no individual retail use would contain over 5,000 sq. ft. of areas open to the public. Primary entrance to the retail uses would not be allowed from SR 903 or Bullfrog Road. The conceptual plan for the future possible commercial development does not comply with the existing development condition. Either the types and sizes of retail uses should be adjusted, or the condition changed or eliminated in the new or updated Development Agreement.

**Other Possible Mitigation Measures**

- Internal buffers/screening could be provided onsite between single and multi-family residential development (MF-1, SF-4, SF-5, and SF-6) and the powerline easement where a recreational trail is proposed.

**Significant Unavoidable Adverse Impacts**

The conversion of the 824-acre 47° North site from undeveloped forest/vegetation to a master plan community under any of the alternatives would represent a significant change in the existing land use of the site, and such change would be unavoidable if the Master Site

Plan is implemented. The change would be consistent with the City of Cle Elum land use and zoning classifications for the site and is not per se an adverse impact to land use or land use patterns. The site is located within a City/UGA and is considered appropriate for urban development. The proposal would represent a continuation of the existing trend of intensifying development in the City and adjacent area. With implementation of the mitigation measures listed above, no significant adverse land use impacts are expected. It is acknowledged, however, that some residents may consider the proposed development to be significant and adverse because of its size, location, or other factors.

## **Aesthetics/Light & Glare**

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### **Proposed Mitigation Measures (Included in the Project)**

- Approximately 477 acres of the site should be preserved as open space, including natural open space, Managed Open Space, River Corridor Open Space, wetlands and their buffers, and power line easements.
- Development areas onsite should be arranged based, in part, on existing topographic features, as reflected in the preliminary Master Site Plan. Combined with existing, retained vegetation, site planning should block views of most elements of the project from most public off-site locations, and/or reduce the perceived visibility or scale of the overall project for viewers at ground level from locations where vegetation or topography does not.
- Proposed development should be consistent with architectural design and materials guidelines that should be developed by the Applicant for residential and other structures, and specifically tailored for the 47° North project site to ensure an overall consistent visual quality. Building materials should include muted colors and textures that are intended to blend into the existing natural setting and should be comprised primarily of wood and stone.
- Low-pressure sodium lights and full-cutoff shielding should be used on outdoor light fixtures.
- Residential area light fixtures should not be mounted higher than 30 feet.
- Unnecessary lighting of building facades should be avoided.
- Landscaping should be provided throughout the site and should create transitions and buffers between various land uses on and adjacent to the site, where necessary.

- Landscaping with native plants should help visually and aesthetically connect the site to the surrounding area.

#### **Bullfrog Flats Conditions of Approval (Included in the Project)**

- Natural open space buffers at least 100 feet wide along Bullfrog Road should be maintained to screen or diffuse views to the interior of the site from this roadway. In addition, undeveloped, forested open space should be preserved onsite within the northeast quadrant of the Bullfrog/I-90 Interchange.
- Standards/recommendations for roadway lighting intensity consistent with the Illuminating Engineering Society of North America should be adopted.
- Lighting designs should be implemented in accordance with the International Dark Sky Association's Zone E1 Standards. These standards are recommended for use in "areas with intrinsically dark landscapes." Examples are national parks, areas of outstanding natural beauty, areas surrounding major astronomical observatories, or residential areas where inhabitants have expressed a strong desire that all light trespass be strictly limited."

#### **Required Mitigation Measures**

- The 50-foot-wide platted buffer adjacent to the SR 903 right of way would be maintained with possible commercial development on the adjacent 25-acre property. The existing forested vegetation in this area could be retained to partially screen the development and help maintain a natural, forested entry to the City of Cle Elum.

#### **Other Possible Mitigation Measures**

- The vegetation in the perimeter buffer should be maintained and replaced if, when, and where necessary in response to natural forces, selective thinning, and fire-wising activities.

#### **Significant Unavoidable Adverse Impacts**

Proposed development on the 47° North site under the SEIS Alternatives would significantly and unavoidably change the visual character of a portion of the site, from undeveloped to developed and urban in character. Some might consider this change to be an adverse impact. However, based on the analysis, the nature and extent of change would not be visible, or would be only partially visible, from most public off-site locations. The site would be visible to the greatest extent from higher elevation vantage points.

Development of the 47° North site under the SEIS Alternatives would result in additional ambient light from accumulated buildings and landscape lighting. This would contribute to existing skyglow effects created by Cle Elum, South Cle Elum, Roslyn, Suncadia, and I-90.

However, the increase in skyglow would be mitigated through implementation of International Dark Sky Association lighting designs. With implementation of the mitigation measures listed above, no significant adverse aesthetic/light and glare/skyglow impacts are expected.

## **Housing, Population, & Employment**

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### **Proposed Mitigation Measures (Included in the Project)**

#### **Bullfrog Flats Conditions of Approval (Included in the Project)**

- Access, water, and sewer **should** be constructed, consistent with development standards, up to the affordable housing parcel boundaries, as with every other parcel in the Master Site Plan.
- Sun Communities, as successor to New Suncadia, **should** be given the option in a new or revised Development Agreement to assist in the selection process for potential owners/developers of the affordable housing parcel.
- A minimum of 150 residential dwelling units, not including the 50 possible affordable housing units, **should** remain rental units and a covenant **should** be recorded on the property to ensure this condition continues for 20 years. Note that all the 180 proposed multi-family housing units in 47° North are proposed to be leased/rented, and manufactured housing are preliminarily proposed to be available for rent as well.

### **Required Mitigation Measures**

- A housing policy in the 2019 City Comprehensive Plan (H-1.9) requires that affordable housing be provided in projects with more than 20 units. The proposal would far exceed this requirement.

### **Bullfrog Flats Conditions of Approval (Not Included in the Project)**

- A useable area of 7.5 acres **should** be conveyed to the City of Cle Elum, or another public or non-profit entity approved by the City. Under the current proposal, a 6.8-acre affordable housing site has been identified; either this site **should** be increased or development density on the affordable housing site **should** be increased.
- The existing supply of affordable housing in Upper Kittitas County **should** periodically be monitored and inventoried, and as necessary advocated for, to help ensure that a continuous supply of housing is affordable for those earning the wages paid at the Suncadia resort. This condition may not be relevant to 47° North since construction

labor demand would be considerably less than for Bullfrog Flats due to the inclusion of manufactured housing.

- The existing labor pool **should** be actively recruited, hired, and contracted with to minimize in-migration employment and associated housing impacts. This condition may not be relevant to 47° North since construction labor demand would be considerably less than for Bullfrog Flats due to the inclusion of manufactured housing.

### **Other Possible Mitigation Measures**

- The estimated monthly mortgage payment for proposed single family housing could be made affordable to city residents, based on 60% of the city's and county's 2018 Median Household Income (MHI) and dedication of 30% or less of a household's monthly gross income to housing and utilities. This affordable housing could be located onsite throughout the proposed residential development.

### **Significant Unavoidable Adverse Impacts**

Development of the 47° North site under the SEIS Alternatives would increase housing demand, permanent population, and employment in the City. The amount of planned growth could be considered significant, and it is an unavoidable consequence of developing the Master Site Plan. In and of itself, however, growth is not necessarily an adverse impact if it has been properly planned for, including providing for adequate housing, infrastructure, and services (see Section DSEIS 3.12, Public Services, Section 3.13, Transportation, and 3.14, Utilities, and FSEIS Section 3-2, **Transportation**, Section 3-4, **Utilities**, and Section 3-5, **Public Services**, for information on the capacity of infrastructure and services to accommodate the SEIS Alternatives, and mitigation measures to address any significant impacts). It is recognized, however, that some people may consider any additional growth, and/or the particular types of development, to be an adverse impact.

## **Historic & Cultural Resources**

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### **Proposed Mitigation Measures (Included in the Project)**

- When the 25-acre property contemplated for future commercial use is proposed to be developed, a field investigation of the property **should** be conducted.

### **Required Mitigation Measures**

- Consultation with Department of Archaeology and Historic Preservation (DAHP) and Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) would continue.
- Compliance with all state regulations (e.g., RCW 27.44, RCW 27.53, SEPA) related to cultural resources would continue. This includes State law regarding the need for an Archaeological Site Alteration Permit from DAHP for any disturbance to archaeological



sites with objects that pre-date the historic era (i.e., precontact archaeological sites) or disturbance to historic archaeological resources that are eligible for or listed in the NRHP. Alterations to a site can include adding fill, building on, removing trees, using heavy equipment on, compacting, or other activities that would change or potentially impact the site, as well as archaeological excavations.

- An inadvertent discovery plan would be adopted for the project and made available onsite during construction.
- Onsite monitoring by a professional archaeologist or cultural resources specialist would take place during all ground disturbing activities with potential to intersect Holocene deposits, which were observed up to 8.5 feet below ground surface, including clearing, grubbing, grading, and construction excavations.
- Construction personnel would be trained on the identification of archaeological resources.
- In the event that ground disturbing or other activities result in the inadvertent discovery of archaeological deposits, work would be halted in the immediate area and contact made with DAHP. Work would be halted until such time as further investigation and appropriate consultation is concluded. See **FSEIS Appendix B** for details on protocols for inadvertent discoveries.
- In the unlikely event of the inadvertent discovery of human remains, work would be immediately halted in the area, the discovery covered and secured against further disturbance, and contact made with law enforcement personnel, consistent with the provisions set forth in RCW 27.44.055 and RCW 68.60.055. See **FSEIS Appendix B** for details on protocols for inadvertent discoveries.

### **Significant Unavoidable Adverse Impacts**

With implementation of the mitigation measures listed above, no significant unavoidable adverse impacts on historic and cultural resources are expected with construction and operation of the SEIS Alternatives.

## **Parks & Recreation**

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### **Proposed Mitigation Measures (Included in the Project)**

- A total of approximately 477 acres of open space, including the Natural, Managed, and River Corridor Open Space areas, perimeter buffers, wetlands and their buffers, and on-site power easements, **should** be included in the project.

- Three public trail parks totaling approximately 1.5 acres and two Community Trail Parks totaling 1.0 acres should be provided.
- An approximate 6-acre adventure center open to residents and the public should be provided.
- Two private recreational amenity centers totaling approximately 11 acres should be provided, one in the RV resort and the other in the residential area.
- A 627-site RV resort, including recreational facilities, should be provided.
- An approximate five-mile trail system and one mile of sidewalks should be provided that would connect on-site development and link to off-site trails in several locations.

**Bullfrog Flats Conditions of Approval (Included in the Project)**

- The Applicant should support the City’s efforts to obtain the necessary right of way or easement to construct an off-site connection from the 47° North site to the existing Coal Mines Trail and should contribute to the cost of the materials to construct the off-site trail connection.

**Required Mitigation Measures**

- The proposed recreational uses would be generally consistent with the City of Cle Elum Parks and Recreation Plan and would meet or exceed the Plan’s LOS goals/targets for active parks, open space, trails/tracks/connections, and associated facilities.
- The specific locations and sizes of parks would be identified in the application and on the Master Site Plan in accordance with Parks and Recreation Targets/Goals in the City’s Comprehensive Plan.

**Significant Unavoidable Adverse Impacts**

An increase in demand for park and recreational services and facilities would be an unavoidable impact of population growth under the SEIS Alternatives. With implementation of the mitigation measures listed above, no significant unavoidable adverse impacts to parks and recreational resources are expected.

**Public Services**

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**Proposed Mitigation Measures (Included in the Project)**

- All the non-residential buildings should include sprinkler systems in case of fire. Fire hydrants should be provided throughout the residential areas.

- Traditional wood campfires **should** not be allowed within the RV resort.

#### **Bullfrog Flats Conditions of Approval (Included in the Project)**

- Mitigation measures for each public service provider **should** include execution of a separate mitigation agreement and a program to monitor actual revenues and expenses for that provider. The program **should**, to the maximum extent possible, strive to time expenditures to when revenues are available and strive to time capital expenditures to when the jurisdiction has sufficient capacity to issue bonds for the improvements and sufficient tax revenue to service the debt. The program **should** also rely on shortfall mitigation payments to address any identified fiscal impacts.
- Site development **should** follow the Land Stewardship Plan (LSP) that is used for Suncadia, which includes provisions for control of noxious weeds during construction, and fire-wising (e.g., thinning small trees, cutting limbs, raking debris and other fuel-reduction techniques) during operation of the project. The LSP **should** be reviewed and updated, as necessary.
- Any emergency vehicle access, other than the public right of way **should** be coordinated with the City of Cle Elum Fire Marshall.

#### **Required Mitigation Measures**

- Worker safety measures would be implemented consistent with Occupational Safety and Health Administration (OSHA) and Washington Industrial Safety and Health Act (WISHA).
- A comprehensive construction plan would be developed. This plan would include, in part, a Fire and Life Safety plan, which would be consistent with the City of Cle Elum's adopted building code requirements for construction, a snow management plan, designated emergency haul routes and access areas, and provisions for fencing and signing the construction site.
- Roadway design would conform with applicable requirements for vehicular access, including roadway width, adequate turning radius, fire hydrant access, provisions for vehicle back up, and weight bearing capacity.
- A secondary access would be provided when more than 30 single- or multi-family units are built, in accordance with the International Fire Code (IFC).

### **Approved Bullfrog Flats Conditions of Approval (Not Included in the Project)**

- Washington State Department of Natural Resources (WDNR) Industrial Precautions should apply to all equipment and clearing and grading until hydrants are operational to provide fire prevention.

### **Other Possible Mitigation Measures**

- An on-site security presence could be provided during the initial construction phase of the project.
- As an interim measure, the Applicant could emphasize and encourage membership in the volunteer fire department among its residents and employees while the department is transitioning to full-time staff.
- Community education regarding domestic and recreation fire protection measures could be provided to help reduce the potential for wildfires.

### **Significant Unavoidable Adverse Impacts**

Development under the SEIS Alternatives would generate additional demand for public services primarily as a result of new population and visitors to the site; this increase in demand is unavoidable. Increased demand in itself, however, is not necessarily an adverse impact, if it is planned for and addressed. To the extent that resulting requirements for additional staff, equipment, and facilities are addressed through increased revenues to affected agencies, and through implementation of committed and recommended mitigation measures listed above, no significant impacts are expected. Also see DSEIS Section 3.15, Fiscal and Economic Conditions, and FSEIS Section 3-7, **Fiscal and Economic Conditions**.

## **Transportation**

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### **Mitigation Measures for SEIS Alternatives 5 & 6**

Intersection improvements to mitigate future non-compliant LOS with SEIS Alternative 5 and 6 in future years 2025, 2031, and 2037, for the weekday summer PM peak hour are shown in **Table 10**. Improvements to address non-compliant LOS under 'Baseline'/background conditions are also included. As shown in **Table 10**, the mitigation measures for SEIS Alternative 5 are anticipated to be similar to the mitigation measures identified for SEIS Alternative 6. This is due to the fact that the development amounts and weekday PM peak hour trip generation estimates for SEIS Alternatives 5 and 6 would be similar in the time periods analyzed; the RV sites proposed in SEIS Alternative 6 would generate approximately the same number of trips as the multi-family residential units in SEIS Alternative 5. The only difference between Table 3.13-19 in the DSEIS and **Table 10** in this FSEIS are in the timing of non-compliance, and therefore mitigation as well, at five study intersections, as follows:

**Table 10**  
**SUMMARY OF MITIGATION MEASURES AND PRELIMINARY ESTIMATED PRO-RATA SHARE FOR SEIS ALTERNATIVE 6**

Off-Site Study Intersection	Estimated Year Improvement Required (Forecast LOS)	Potential Improvement to Mitigate LOS Deficiency <sup>1</sup>	WITH 100% OCCUPANCY OF 47° NORTH RV RESORT <sup>2</sup>						WITH 50% OCCUPANCY OF 47° NORTH RV RESORT <sup>2</sup>					
			METHOD A Estimated Pro-Rata Share <sup>3</sup>			METHOD B Estimated Pro-Rata Share <sup>3</sup>			METHOD A Estimated Pro-Rata Share <sup>3</sup>			METHOD B Estimated Pro-Rata Share <sup>3</sup>		
			Back-ground Share <sup>4</sup>	SEIS Alternative 6 Share		Back-ground Share <sup>4</sup>	SEIS Alternative 6 Share		Back-ground Share <sup>4</sup>	SEIS Alternative 6 Share		Back-ground Share <sup>4</sup>	SEIS Alternative 6 Share	
				47° North	Commercial Parcel		47° North	Commercial Parcel		47° North	Commercial Parcel		47° North	Commercial Parcel
<b>IMPROVEMENTS NEEDED FOR 'BASELINE'/BACKGROUND CONDITIONS</b>														
#8 – Ranger Sta Rd / Miller Ave / W 2 <sup>nd</sup> St (SR 903) <sup>7</sup>	2025 (LOS D)	Compact RAB or Signalization	76.6%	20.4%	3.0%	76.6%	20.4%	3.0%	78.1%	18.4%	3.5%	78.1%	18.4%	3.5%
#11 – Douglas Munro Blvd / W 1 <sup>st</sup> Street	2025 (LOS E)	RAB or Signalization	96.7%	2.9%	0.4%	96.7%	2.9%	0.4%	97.1%	2.4%	0.5%	97.1%	2.4%	0.5%
#12 – N Pine St / W 1 <sup>st</sup> Street	2025 (LOS D)	Traffic Signal or Left-Turn Restrictions	97.4%	2.3%	0.3%	97.4%	2.3%	0.3%	97.4%	2.2%	0.4%	97.4%	2.2%	0.4%
#13 – N Stafford Ave / W 2 <sup>nd</sup> Street (SR 903) <sup>7</sup>	2025 (LOS E)	Compact RAB or Signalization	83.2%	16.8%	2.5%	83.2%	16.8%	2.5%	82.2%	15.0%	2.8%	82.2%	15.0%	2.8%
<b>IMPROVEMENTS NEEDED FOR CONDITIONS WITH SEIS ALTERNATIVE 6 <sup>5</sup></b>														
<b>By Year 2025:</b>														
#9 – N Pine Street / W 2 <sup>nd</sup> Street (SR 903) <sup>7</sup>	2025 (LOS D)	Compact RAB or Signalization or Turn Restrictions	n/a	87%	13%	77.1%	19.9%	3.0%	n/a	84%	16%	78.6%	18.0%	3.4%
#15 – N Oakes Ave / W 2 <sup>nd</sup> Street (SR 903) <sup>7</sup>	2025 (LOS D)	Compact RAB or Signalization	n/a	87%	13%	85.6%	14.4%	2.1%	n/a	84%	16%	85.0%	12.6%	2.4%
<b>By Year 2031:</b>														
#1 – Bullfrog Road / I-90 EB Ramps <sup>7</sup>	2031 (LOS D)	Compact RAB or Signalization	n/a	64%	36%	77.4%	14.5%	8.1%	n/a	61%	39%	80.7%	11.8%	7.5%
#7 – Denny Ave / W 2 <sup>nd</sup> Street (SR 903) <sup>7</sup>	2031 (LOS E)	Refuge/merge lane on SR 903 or Left- Turn Restrictions	n/a	64%	36%	68.1%	20.4%	11.5%	n/a	61%	39%	69.1%	18.8%	12.1%
#21 – Pennsylvania Ave / 1 <sup>st</sup> Street (SR 903) <sup>7</sup>	2031 (LOS D)	All-Way Stop	n/a	64%	36%	90.1%	6.3%	3.6%	n/a	61%	39%	90.4%	5.9%	3.7%
<b>By Year 2037: <sup>6</sup></b>														
#2 – Bullfrog Road / I-90 WB Ramps <sup>7</sup>	2037 (LOS E)	Compact RAB or Signalization	n/a	0%	100%	81.8%	9.1%	9.1%	n/a	0%	100%	84.2%	7.3%	8.5%
#3 – Bullfrog Road / Tumble Creek Dr	2037 (LOS F)	Refuge/merge lane on Bullfrog Rd	n/a	0%	100%	81.1%	9.5%	9.4%	n/a	0%	100%	83.3%	7.7%	9.0%

1. Improvement needed to mitigate non-compliant LOS during weekday PM peak hour; with improvement the intersection LOS would meet standard. RAB = Roundabout.
2. Average occupancy of 47° North RV resort during summer weekday PM peak hour estimated to be 50% based on data provided by Applicant. Estimated pro-rata shares are presented for both 100% and 50% RV resort occupancy.
3. Estimated pro-rata share for 47° North and commercial parcel are preliminary estimates and will be adjusted based on a future Monitoring Program.
4. Share of future traffic volumes associated with background traffic growth not specifically from SEIS Alternative 6.
5. Mitigation not triggered by 'Baseline' conditions, but triggered by traffic generated by SEIS Alternative 6 (47° North and/or commercial parcel).
6. 47° North is anticipated to be built out by 2031. Therefore pro-rata share of mitigation triggered by SEIS Alt 6 in 2037 is 100% to the commercial parcel for pro-rata Method A.
7. Separate Intersection Control Evaluation (ICE) studies at WSDOT intersections will be conducted to evaluate and recommend specific mitigation during review of a project application.

- #1 – Bullfrog Road / I-90 EB Ramps is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2031 instead of 2037;
- #8 – Ranger Station Road / Miller Avenue / W 2<sup>nd</sup> Street (SR 903) is anticipated to operate at a non-compliant LOS under ‘Baseline’ conditions in 2025 instead of SEIS Alternative 6 conditions in 2025;
- #9 – N Pine Street / W 2<sup>nd</sup> Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2025 instead of 2031;
- #15 – N Oakes Ave / W 2<sup>nd</sup> Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2025 instead of 2031; and,
- #21 – Pennsylvania Ave / 1<sup>st</sup> Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2031 instead of 2037.

To assist the Applicant, City of Cle Elum, and WSDOT in confirming the appropriate type of mitigation improvements, Intersection Control Evaluation (ICE) documents are being prepared and will be considered during review of a project application. ICE documents will be prepared for study intersections within WSDOT’s jurisdiction. Criteria addressed in the ICE analyses will include: LOS operations, safety, right-of-way acquisition, engineering criteria and feasibility, and context for sustainable design. The City may also require a similar ICE analysis at the two additional (non-WSDOT) intersections that are anticipated to operate at non-compliant LOS.

**Table 10** identifies mitigation based on occupancy of the RV resort; both 100% occupancy of the 47° North RV resort during the summer weekday PM peak hour (consistent with the DSEIS) and 50% occupancy of the 47° North RV resort during the summer weekday PM peak hour (based on new data provided by the 47° North Applicant at two existing and similar RV resort properties in the U.S.).

**Table 10** includes a preliminary estimate of the pro-rata share for the 47° North (residential and RV uses) and the future commercial development based on forecast future traffic volumes with SEIS Alternative 6 during the year in which mitigation is necessary to maintain acceptable LOS (i.e., 2025, 2031, and 2037). For intersections where improvements would be needed by 2037, there would be no pro-rata share for 47° North since the project is anticipated to be built out before 2031; therefore 100% of the pro-rata share would be the responsibility of the commercial development. Two methods of calculating pro-rata share are included in the FSEIS: Method A (Developer Responsibility) - For intersections where improvements would be needed by 2025 or 2031 with SEIS Alternative 6 to meet LOS standards, the pro-rata share would be the full responsibility of the 47° and the separate commercial parcel; and Method B (Shared City/Developer Responsibility) - This method identifies the share of the 47° North and commercial parcel as a portion of the mitigation responsibility and shares the remaining portion with background growth. This method assumes that the governmental entities responsible for the intersection would contribute

funds proportionate with their shares of the future forecast traffic at the intersection. There are also other potential pro-rata share methods that could be applied to fund transportation mitigation.

The pro-rata shares summarized in **Table 10** are preliminary estimates based on forecasts of future traffic; the final pro-rata share percentages for the 47° North development and commercial parcel are anticipated to be confirmed using a recommended Monitoring Program that should be established in a new or updated Development Agreement. The detailed pro-rata share calculations are included in **FSEIS Appendix A**.

Additionally, although improvements to mitigate future non-compliant LOS at study intersections with SEIS Alternative 6 during the weekday PM peak hour for peak summer conditions have been preliminarily identified in **Table 10**, the specific mitigation to be constructed and the timing of the mitigation is anticipated to be further refined based on input and evaluation from the Applicant and the City of Cle Elum, and with potential input from other stakeholders (e.g., Kittitas County and WSDOT), as appropriate. Other factors that may be considered by the stakeholders in determining the specific improvement and timing as part of a new or updated Development Agreement may include right of way acquisition, engineering criteria and feasibility, and cost.

Note that the mitigation measures identified in **Table 10** are intended to mitigate the anticipated weekday PM peak hour conditions during the peak summer months. However, improvements identified to mitigate weekday PM peak hour non-compliant LOS during peak summer conditions would also improve conditions during Friday and Sunday PM peak hour conditions during both the peak summer and non-summer periods.

### **Other Mitigation Measures**

#### **Traffic Monitoring Program**

The 47° North development should prepare and implement a traffic monitoring program as part of a new or updated Development Agreement. It is expected that the traffic monitoring program would be similar in format and function to the previously established program documented in the 2002 Development Agreement (Condition 92). The monitoring program would be coordinated with the City, in cooperation with Kittitas County and WSDOT, and would have the following objectives:

- A. Document traffic volumes at key locations (roadways and/or intersections) in the local transportation network that would be impacted by traffic generated by the 47° North development;
- B. Separate traffic volumes at key locations by background traffic, 47° North development traffic, and traffic associated with development of the commercial property; and,

- C. Help establish or confirm the timing, location, and nature of required transportation improvements and consider the pro-rata share calculations.

The specific details of the traffic monitoring program, including the number of phases of monitoring, appropriate timing of phases of monitoring (i.e., at defined development years or relative to percent or number of units constructed), time periods to be counted, key locations to be counted, and reporting requirements will be coordinated with the City as part of the new or updated 47° North Development Agreement.

### Construction Management Plan

The 47° North development should prepare a Construction Management Plan prior to beginning construction to minimize construction traffic impacts. Truck routes and haul route agreements for construction-related traffic would be established in coordination with the City of Cle Elum, Kittitas County, and WSDOT, as necessary. Additionally, provisions should be made in the new or updated Development Agreement between the Applicant and the City for restoration of road surfaces damaged by construction traffic, if any.

### Trail System & Sidewalks

Based on preliminary plans, the 47° North development would provide an approximately 6-mile network of trails and sidewalks throughout the site, including: hike/bike, equestrian, and golf cart paths. The trails would connect to on-site development, as well as to existing off-site trails. Sidewalks would also be provided along one side of the on-site road connecting SR 903 and Bullfrog Road for non-motorized circulation.

### **Significant Unavoidable Adverse Impacts**

Proposed development under SEIS Alternatives 5 and 6 would increase traffic volumes and congestion on area roadways (e.g., in the City, County, and on state facilities such as SR 903, SR 907, and I-90); this is an unavoidable effect of urban development. The LOS analysis indicates that several of the studied intersections would exceed LOS standards during the PM summer peak hours in the future analysis years with the additional traffic generated by the SEIS Alternatives; some of these intersections would also exceed the LOS standards without the projects due to continued growth in background traffic, without the projects. The mitigation measures listed above would offset or reduce the significant adverse impacts under SEIS Alternative 6. The measures will ultimately be included in a new or updated Development Agreement between the Applicant and the City.

## **Utilities**

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### **Proposed Mitigation Measures (Included in the Project)**

- Recycling within the 47° North development should be encouraged.



## Approved Bullfrog Flats Conditions of Approval (Included in the Project)

### *Water & Sewer*

- Draft Water Use Standards **should** be updated as part of the Development Standards for the proposed development. The standards **should** be required under the project Covenants, Conditions, & Restrictions (CC&Rs).
- Water use and conservation policies **should** be contained in the CC&Rs for the project, including low-flow fixtures, limitations on landscaping, and other water-conservation measures, as coordinated with the City of Cle Elum.
- Limitations **should** be set on the area allowed for irrigation for each type of residential unit.
- Irrigation efficiency **should** be promoted through educating and recommending the use of drought-tolerant landscaping to the residential and commercial property owners.
- The Applicant **should** be responsible for the costs to design and construct all water, sewer, and stormwater facilities onsite.
- In accordance with the City of Cle Elum's adopted water policy for the UGA, the City will initially issue certificates of water availability for the project based on the water use rate set forth in the City's 2015 Comprehensive Water Plan. The Washington State DOH design criteria requires a minimum of three years of historical consumption data be used in establishing ERU average demand.

### *Solid Waste*

- A Construction C&D recycling program **should** be developed that would require contractor participation and would be approved by Kittitas County Solid Waste Department prior to the start of construction.

## **Required Mitigation Measures**

### *Water & Sewer*

- The Applicant would contribute a pro-rata share to construct the improvements to the City's water system required to serve the project, including: a filter train in the water treatment plant, a finished water pump in Pressure Zone 3, and a reservoir in Pressure

Zone 3. Projected water demands would be translated into actual consumption as the development phases are constructed.

Projected water demand would be translated into actual consumption as the phases of development are constructed. The 2001 Water Supply System Project Development Agreement between the City of Cle Elum and Trendwest (now New Suncadia) established “trigger” points when improvements would become necessary, including production thresholds for specified duration, or when a specified number of new connections are reached. Similar “trigger” points should be established for the three system components identified above.

To confirm proportionate share responsibility, a usage monitoring/metering plan should be implemented that would adjust allocation on an actual demand basis. Monitoring/metering would already be necessary to determine when the capacity improvements would be triggered.

### *Solid Waste*

- The Applicant would handle all construction debris, separate re-cyclable materials, and otherwise handle all its solid waste and household hazardous waste consistent with the requirement for such handling in the Kittitas SWMP.

### **Significant Unavoidable Adverse Impacts**

Consumption of water and generation of solid waste are unavoidable impacts of population growth and development. Potential significant adverse impacts to water and solid waste service would be avoided through the mitigation measures identified above. No significant unavoidable adverse impacts to wastewater facilities are expected with development under the SEIS Alternatives.

## **Fiscal & Economic Conditions**

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### **Proposed Mitigation Measures – Economic Impacts**

- The nature of the impacts identified for SEIS Alternative 6 should include: increases in employment opportunities, increases in potential personal income, lower unemployment rates, diversity in the workforce, and added new business commerce. Impacts would be positive, and mitigation is not warranted.

### **Proposed Mitigation Measures – Fiscal Impacts**

This section presents fiscal mitigation measures by taxing authority/entity to address the findings for SEIS Alternative 6, including (47° North) and (the commercial property).

## City of Cle Elum

The analysis focused on a calculation of net fiscal impacts for the City of Cle Elum. For SEIS Alternative 6, the analysis identified a fiscal surplus in 2037. Based on this analysis and considering the residential/RV and commercial elements of Alternative 6 together, mitigation for fiscal impact is not anticipated to be necessary to maintain the City's fiscal solvency. However, when looking at the components of SEIS Alternative 6 – 47° North and the commercial property – separately, the future commercial development would generate a fiscal shortfall in earlier years. However, the deficit would be addressed in later years when revenues increase. The residential and RV resort would generate fiscal shortfalls post buildout due to cessation of construction related sales taxes and increasing City costs (e.g., staff salaries) over time.

Given the distinct findings for SEIS Alternative 6 for 47° North and the commercial property, should future mitigation become necessary — consistent with typical municipal budgeting practices — the City should consider imposing new taxes or fees to balance its budget or seek to change levels of public services to meet available revenues, or a combination of both approaches.

Implementation of a periodic fiscal monitoring program (e.g., in two to five-year increments) should also be considered following buildout. Fiscal monitoring could reasonably occur during buildout as well, however, revenues may lag behind costs resulting in an incomplete picture of the impact. Fiscal monitoring could be particularly helpful as costs and revenues unassociated with the 47° North portion of SEIS Alternative 6 would impact the City's overall fiscal situation along with the proposed development. Additionally, the DSEIS assumes the City's Fire Department will move to full time employment and away from its current model of service. Furthermore, future negotiations should consider the measures proposed in the Approved Bullfrog Flats Development Agreement. That agreement identified several conditions to mitigate fiscal shortfalls and to ensure existing citizens and ratepayers would not suffer negative financial impacts as a result of the development. Conditions cited that Trendwest (now New Suncadia) would: allow a Municipal Facilities and Services Expansion Plan to guide capital expansions; make fiscal shortfall mitigation payments; pay for the development's share of planning, water/wastewater treatment plant construction, and permit fees; and, coordinate security forces with police and fire services.

## Kittitas Hospital District No. 2

Fiscal analysis for the Hospital District found that projected costs were greater than projected property tax revenues under SEIS Alternative 6 (in particular 47° North). However, the District would also receive patient service fees. It is, therefore, difficult to assess the underlying fiscal situation of the District over time. The analysis assumed that new Full Time

Equivalent (FTE) employees would be added to meet service needs, and, therefore, as service needs grow, so too would patient service fees.

A future mitigation agreement **should** consider a fiscal monitoring program. The Hospital District could track property tax revenues and patient fees attributed to SEIS Alternative 6 (47° North) and, should revenues not cover costs of service (over a certain period of time), a monthly mitigation payment could be made to the Hospital District to avoid fiscal shortfalls.

### KITTCOM

Projected revenues from the KITTCOM phone tax exceeded projected costs for new FTE in SEIS Alternative 6 as a whole and the 47° North component of this alternative. Accordingly, fiscal mitigation is not anticipated to be necessary.

Revenues did not, however, exceed costs for the commercial parcel under SEIS Alternative 6. The analysis did not factor in intergovernmental revenues or subscriber fees which could address the fiscal shortfall. It is reasonable to assume that intergovernmental revenues would scale up with growth in the city/county. Further, subscriber fees could reasonably be restructured to cover additional funding needs as underlying needs change.

### Cle Elum-Roslyn School District

The net fiscal impact to the school district from SEIS Alternative 6 is unclear. The analysis shows that cumulative costs derived from projected new teacher FTE were estimated to exceed projected property tax revenues for operations under SEIS Alternative 6. However, the District would receive additional intergovernmental revenues which are expected to offset fiscal shortfalls, mainly through state support for schools funded by the state property tax.

Similar to existing agreements between Trendwest (now New Suncadia) and the School District (e.g., the December 2001 Letter to the District from Trendwest and the January 2003 School Mitigation Agreement between Trendwest and the School District), a School Mitigation Agreement could be executed between the Applicant and the District that would:

- Reimburse the District for the costs of starting up and maintaining a system to account for student enrollment related to the 47° North project;
- Contribute to the costs of portables attributable to the project; and
- Contribute to the costs of buses attributable to the project.

### **Significant Unavoidable Adverse Impacts**

No significant unavoidable adverse economic impacts are expected under the SEIS Alternatives. Economic impacts would generally be positive.

No significant unavoidable adverse fiscal impacts are expected. A fiscal impact can be defined as adverse in any situation where costs exceed revenues and the extent of any fiscal shortfall (deficit) will determine the significance of the impact. However, adverse impacts can be mitigated and are not unavoidable. If ongoing fiscal monitoring to determine appropriate mitigation measures are pursued, then no significant adverse fiscal impacts are anticipated to be unavoidable. Taxing jurisdictions should continue to conduct typical, budget-balancing exercises and use their taxing powers to ensure their fiscal solvency. Mitigation agreements with affected jurisdictions could be implemented as a condition of project approval to address any specific and/or general fiscal impact concerns that may occur. Therefore, no significant unavoidable adverse impacts are expected.