

# CHAPTER 3

## TOPIC AREA RESPONSES / UPDATED INFORMATION & ANALYSIS

The City provided a 45-day extended public comment period for the *47° North Proposed Master Site Plan Amendment Draft Supplemental Environmental Impact Statement* (Draft SEIS or DSEIS). All the comments that were received from agencies, tribes, organizations, and individuals during the comment period, as well as comments from one agency and one individual that were received after the comment period, are contained in **Chapter 4** of this Final SEIS (or FSEIS). 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 comment letters that were received (approximately 76% of all the letters) contained comments that related to the municipal/community recreation center site in 47° North.

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 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 this chapter under the applicable responses. Technical memos/reports on which the responses are based are contained in FSEIS appendices: **Appendix A** (Transportation Analysis Addendum Memo), **Appendix B** (Updated Cultural Resources Report), **Appendix C** (Updated Supplement to the Site Engineering Technical Report), **Appendix D** (Updated Plants, Animals, & Wetlands Memo), and **Appendix E** (Updated Fiscal Conditions Memo).

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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.

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The organization of each topic area is as follows: common themes or issues within the topic area are identified; the comments received on the common theme or issue are listed. The comment letter number, followed by the applicable individual comment number in parenthesis, corresponds to the numbers shown in the margins of the comment letters in **Chapter 4**. Responses to the group of comments, including updated information and analysis, are provided below the summary of comments.

## **3-1. PARKS & RECREATION**

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### **3-1.1 2020 DSEIS**

DSEIS Section 3.11, Parks & Recreation, discussed existing parks and recreation conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on parks and recreation, and identified mitigation measures to address impacts.

The DSEIS concluded that SEIS Alternative 5 (the Approved Bullfrog Flats Master Site Plan) and Alternative 6 (the Proposed 47° North Master Site Plan Amendment) would generate additional demand for parks and recreational facilities during the construction and operation phases. Overall, there would be fewer permanent residents, less commercial development, and a shorter buildout period under SEIS Alternative 6 than under SEIS Alternative 5, which together would result in reduced demand for parks and recreational facilities. The RV visitor population under SEIS Alternative 6 would generate some demand for parks and recreational facilities; however, since these would not be permanent residents, and the entire RV resort and other facilities in the project would be considered recreational amenities (with certain facilities and trails for use by RV resort guests and 47° North residents only, and certain facilities available for use by the public), the RV visitors are not expected to generate as great a demand as permanent residential unit occupants. The parks and recreational facilities proposed under SEIS Alternative 6 would generally be consistent with goals and policies in the City Parks and Recreation Plan and would meet or exceed the targets identified in the Plan. As a result, significant impacts to parks and recreational facilities are not anticipated.

### **3-1.2 2021 FSEIS**

#### **3-1.2.1 Municipal/Community Recreation Center**

##### **Comments Received**

L-7 (1), L-8 (1), L-9 (1), L-10 (1), L-16 (1), L-17 (1), L-19 (1), L-20 (1), L-21 (1), L-23 (1), L-24 (1), L-25 (1), L-26 (1), L-27 (1), L-28 (1), L-30 (1), L-31 (1), L-32 (2), L-33 (1), L-34 (1), L-35 (1), L-36 (1), L-37 (1), L-38 (1), L-39 (1), L-40 (1), L-42 (1), L-43 (1), L-44 (1), L-45 (1), L-46 (1), L-47 (3), L-48 (1), L-49 (1, 2), L-51 (1), L-52 (1), L-53 (1), L-56 (1), L-57 (1), L-59 (1), L-61 (1), L-62 (1), L-64 (1), L-65 (1), L-66 (1), L-67 (1), L-68 (1), L-69 (1), L-71 (1), L-72 (1), L-73 (1), L-74 (1), L-75 (1), L-76 (1), L-77 (1), L-78 (1), L-79 (1), L-83 (1), L-84 (1), L-85 (1), L-86 (1), L-88 (1), L-89 (1), L-90 (1), L-95 (1), L-96 (1), L-97 (1), L-98 (1), L-100 (1), L-101 (1), L-102 (1), L-103 (1), L-104 (1), L-105 (1), L-106 (1), L-107 (1), L-108 (1), L-109 (1), L-110 (1), PM-1 (1), VM-1 (1), VM-2 (1), VM-4 (1), VM-5 (1), VM-6 (1), VM-7 (1), VM-8 (1)

Most of the comments that were received by the City of Cle Elum during the 47° North DSEIS public comment period related to the municipal/community recreation center, which is a requirement contained in the 2002 Bullfrog Flats Development Agreement (2002 Development Agreement) between the City and Suncadia. These comments focused on:

when the site would be dedicated to the City; the amount of funding to be provided by Suncadia for the recreation center; and, the timing of construction of the recreation center.

### Response to Comments/Updated Information & Analysis

The dedication of land, funding, and development of the municipal/community recreation center located on a portion of the 47° North site is based on a condition from the 2002 Development Agreement between New Suncadia and the City. Performance of this condition is the responsibility of New Suncadia, not the 47° North Applicant, Sun Communities. The recreation center is not related to impacts caused by 47° North and identified in the SEIS and is not a subject requiring further analysis in this FSEIS.

Note that the City of Cle Elum and New Suncadia recently reached an agreement related to the municipal/community recreation center. This agreement, which is now being implemented, provides for transfer of title to the recreation center site and payments to support construction of a facility. Additional SEPA review will be required when specific development plans for the recreation center are proposed.

### **3-1.2.2 Relationship to Washington State Horse Park**

#### Comments Received

L-5 (1-6)

The Washington State Horse Park (Horse Park) requested that the project provide safe and functional trails onsite for equestrian use. They asked that they continue to be able to use the open space to the west of the RV resort. They would like the use of the proposed public trail parks to be controlled during Horse Park events. They questioned whether there are any plans for the 8-acre parcel in the northeastern corner of the Horse Park. Finally, they voiced concern about traffic impacts at the intersections of Douglas Munro Boulevard/W First Street and Ranger Station Road/SR 903, which provide access to the Horse Park.

### Response to Comments/Updated Information & Analysis

DSEIS and FSEIS **Chapter 2**, describes the conceptual plans for the open space, parks, and trails under SEIS Alternative 6 (see FSEIS **Figure 2-13**, Parks & Trails Plan—SEIS Alternative 6 for a conceptual depiction of these facilities). An approximately 6-mile-long network of trails and sidewalks would be provided throughout the site, including hiking/biking, equestrian, and golf cart paths. The trails used for pedestrian, equestrian, and mountain biking would be composed of compacted aggregate, natural materials, or similar materials. Trails or specific courses that are permitted in the open space areas, approved by Sun Communities, and constructed by the Horse Park, would be maintained by the Horse Park. The WSHP's request for safe and functional trails for equestrian use, as well as for use of the public trails parks to be controlled during WSHP events, will be taken into account by the Applicant and City, respectively, during preparation and review of the formal 47° North Master Site Plan application. Provisions for equestrian use of the site could also be included in the project's new or updated Development Agreement.

At this point, there are no known plans specific to the 8-acre parcel in the northeastern corner of the Horse Park, which is being retained by New Suncadia and is not part of the 47° North Master Site Plan.

The impacts of the SEIS Alternatives on the intersections of Douglas Munro Boulevard/W First Street and Ranger Station Road/SR 903 were analyzed and mitigation measures identified in the DSEIS and this FSEIS (see DSEIS Section 3.13, Transportation and Appendix J, and FSEIS **Appendix A** for details).

### **3-1.2.3 Impacts of RV Resort Visitors**

#### **Comments Received**

L-93 (1-3), L-99 (48, 49) (repeated in L-94 [1])

A couple of comments were concerned about the impacts of the RV resort visitors on parks, trails, open space, and events in Roslyn, Ronald, and the Upper County. One comment asked for more specific analysis or data to determine the actual impacts of the project on these recreational facilities. Concern was also voiced about inadequate parking at trailheads.

#### **Response to Comments/Updated Information & Analysis**

DSEIS Section 3.11, Parks & Recreation, discussed the impacts of the SEIS Alternatives on parks, trails, and open space in the site vicinity. The DSEIS indicated that the increased population associated with SEIS Alternative 6 would increase the demand on regional resources such as camping, fishing, and hiking areas within nearby National Forests and Wilderness areas, on park and recreational resources in Kittitas County, and on local playfields within the Cle Elum vicinity. The greater use of recreational resources would correspondingly place additional demands on federal and state agencies, as well as local cities to manage and maintain them.

Compared to SEIS Alternative 5, the overall demand on these facilities under SEIS Alternative 6 is expected to be less, mainly because the projected permanent population would be less (2,809 permanent residents under SEIS Alternative 5 vs. 1,489 permanent residents under SEIS Alternative 6). The DSEIS acknowledged that the RV resort visitors under SEIS Alternative 6 would contribute to the need for regional, county, and local parks and recreational facilities, particularly because they are often coming specifically to use the area's recreational resources. However, these visitors would not be year-round residents that would generate permanent population using these recreational facilities. Even accounting for these visitors as part of the population estimates under SEIS Alternative 6 (assuming a proxy population of 941), the overall population and resulting impacts would be less than under SEIS Alternative 5 (see DSEIS Section 3.9, Housing, Population, and Employment, for details). Also, the proposed RV resort and entire site would provide substantial recreational amenities (e.g., RV sites, parks, trails, amenity centers, and an

adventure center); see DSEIS and FSEIS **Chapter 2** for details). Certain of these facilities are specifically designed for the use of the RV visitors only (e.g., a 5.0-acre amenity center and various sport courts). Therefore, RV resort visitors are not expected to place as great a demand on off-site recreational resources as the permanent population in the proposed housing.

It is acknowledged that overall growth in the region, as well as the growth generated by proposed development under SEIS Alternative 6, would increase the demand for parking at trailheads. Possible expansion of these parking areas would be the responsibilities of the federal and state agencies and local counties and cities in whose jurisdiction the trails and parking areas are located. However, purposefully limiting parking can also serve to limit overuse of trails.

## **3-2. TRANSPORTATION**

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### **3-2.1 2020 DSEIS**

DSEIS Section 3.13, Transportation, and Appendix J discussed existing transportation conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on transportation, and identified mitigation measures to address impacts.

The DSEIS concluded that the SEIS Alternatives would generate temporary construction-related traffic impacts over buildout of the project. Construction traffic impacts would be shorter and more condensed under SEIS Alternative 6. Proposed development under the SEIS Alternatives would increase traffic volumes and congestion on area roadways during operation of the project (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 indicated that several of the studied intersections would exceed LOS standards during the summer PM peak hours in the future analysis years (2025, 2031, and 2037) with the additional traffic generated by the SEIS Alternatives; some of these intersections would also exceed the LOS standards without the projects (Baseline scenario) due to continued growth in background traffic. Measures were identified to mitigate intersections anticipated to operate at non-compliant LOS in the future analysis years under 'Baseline' conditions and conditions with the SEIS Alternatives.

### **3-2.2 2021 FSEIS**

Additional information and analysis are provided in this FSEIS to respond to some comments on transportation. This information/analysis is summarized in the responses below; the full analysis is contained in the FSEIS **Appendix A**, Updated Transportation Analysis Addendum Memo.

#### **3-2.2.1 General Traffic/Congestion & Access Considerations**

##### **Comments Received**

L-14 (6), L-47 (1), L-58 (1), L-60 (2, 3, 5), L-82 (6, 31), L-87 (4), L-94 (5)

Comments on the DSEIS expressed general concerns about traffic and congestion, as well as concerns about the increased safety risks due to added traffic. Several comments asserted that the RV resort traffic with SEIS Alternative 6 would create greater traffic impacts. Other comments expressed concerns related to traffic congestion and the impacts on existing roads. One comment indicated that increased traffic levels are dangerous, and the existing infrastructure is not adequate for the addition of more residents. Some comments requested mitigation for impacts to roads, safety, and congestion. A few comments expressed concern about traffic blocking emergency response and the need for an improved or alternate evacuation route.

## Response to Comments/Updated Information & Analysis

### *General Traffic/Access*

The 47° North DSEIS transportation analysis evaluated the transportation impacts of SEIS Alternative 5 (Approved Bullfrog Flats Master Site Plan) and SEIS Alternative 6 (Proposed 47° North Master Site Plan Amendment). SEIS Alternative 6 includes residential and RV resort development, as well as possible commercial development. Mitigation measures were identified to address impacts at the site access locations, within the site, and at off-site intersections that are anticipated to operate at non-compliant LOS during the weekday PM peak hour during the peak summer months in future years 2025, 2031, and 2037 (see DSEIS Section 3.13, Transportation, and Appendix J for details).

The DSEIS traffic analysis was based on standard traffic analysis and engineering practices and current industry standards; the scope of the traffic analysis was identified in coordination with stakeholders that included the City of Cle Elum, Kittitas County, and WSDOT, as well as input received from the public through SEIS scoping (including at a public scoping meeting).

The traffic analysis used existing (2019) traffic count data in the study area during peak summer months, estimated future traffic in the baseline without the 47° North development, and evaluated traffic impacts with development under SEIS Alternatives 5 and 6 for peak summer months during the weekday, Friday, and Sunday PM peak hours in future years 2025, 2031, and 2037.

A total of 27 intersections were evaluated in the DSEIS for level of service (LOS) during these three PM peak periods for the summer peak months with and without SEIS Alternatives 5 and 6, and their performance was compared to adopted LOS standards. If an intersection was anticipated to operate at non-compliant LOS with SEIS Alternatives 5 or 6, potential mitigation was identified; improvements could include road widening to accommodate merge or turn-lanes, stop control and turn restrictions, as well as traffic signalization and roundabouts. A Monitoring Program and a Construction Management Plan were identified as mitigation measures. On-site infrastructure was included in the proposal, such as new roads, trails, and sidewalks.

An addendum to the DSEIS traffic analysis was prepared for this FSEIS to provide additional information (e.g., on crash severity), to update LOS standards (i.e., revise the LOS standard for SR 903 intersections from D to C), and to study an additional possible methodology to calculate proportionate share of mitigation (see FSEIS **Appendix A**).

### *Emergency Access*

The 47° North project includes provisions for emergency access, including access points and roadway layout, consistent with the requirements of the 2021 International Fire Code (IFC),

Appendix D. The conceptual Master Site Plan under SEIS Alternative 6 also provides for possible emergency access routes through the site that could be connected to Douglas Munro Boulevard to provide emergency access for other neighborhoods in the Cle Elum area. See FSEIS Section 3-5, **Public Services**, for details.

### **3-2.2.2 Existing Traffic Volumes**

#### **Comments Received**

L-99 (25, 26) (repeated in L-94 [1])

One comment noted that existing (raw) traffic count data was not included in the DSEIS. Another comment indicated that the existing (adjusted) traffic volumes at study intersections #21-23 (SR 903/E Pennsylvania Avenue, SR 903/Pacific Avenue, SR 903/Rock Rose Drive/Morrel Drive) underestimate summer peak period traffic.

#### **Response to Comments/Updated Information & Analysis**

It is acknowledged that the 2019 existing (raw) traffic count data collected at the study intersections was not included in the DSEIS. This traffic count data has been included in the FSEIS Transportation Analysis Addendum (see FSEIS **Appendix A**).

The initial list of study intersections identified for evaluation in the DSEIS was agreed upon by stakeholders (i.e., City of Cle Elum, Kittitas County, and WSDOT). The initial scoping process did not identify study intersections #21-23 in Roslyn and Ronald. After the formal SEIS scoping process, the City and SEIS consultant team decided to add these three study intersections; however, that decision occurred in the fall, so it was not feasible to conduct counts during summer months. As a result, existing counts at intersections #21-23 were conducted in December and were increased by 63% to estimate peak summer conditions. The 63% adjustment was based on adopted adjustment factors included in the WSDOT Short Count Factoring Guide (June 2019); these factors were reviewed and agreed upon by the SEIS transportation consultant and the City of Cle Elum's transportation consultant. This is a standard practice used to scale winter season counts to summer counts and is based on empirical data for a "GR-09: Rural Central Mountain (Strong Recreational Influence)" regional context adopted by WSDOT. Therefore, the factored counts used in the DSEIS are considered to appropriately represent the summer traffic conditions at intersections #21-23.

### **3-2.2.3 Level of Service (LOS) Standards**

#### **Comments Received**

L-3 (1, 2), L-99 (26, 29, 31, 37) (repeated in L-94 [1])

A comment from WSDOT noted that the LOS standard for state facilities in Cle Elum is LOS C (Rural) rather than LOS D (Urban). Additional comments were related to existing and future forecast LOS at the intersection of SR 903/Pennsylvania Avenue in Roslyn. One comment

stated that the SR 903/Pennsylvania Avenue intersection is operating at LOS F during peak summer periods, and so impacts of the proposal in the future are understated.

### Response to Comments/Updated Information & Analysis

The DSEIS traffic analysis incorrectly assumed that Cle Elum was considered “urban”, since it is a City and within an Urban Growth Area, and applied WSDOT’s LOS Urban standard of LOS D. However, WSDOT categorizes areas as Urban or Rural based on population, with a threshold of 7,500 considered to be Urban. As a result, the LOS tables and mitigation tables in the FSEIS Transportation Analysis Addendum have been updated to apply WSDOT’s Rural threshold standard of LOS C at the I-90 ramps and at intersections on SR 903 (see FSEIS **Appendix A**).

### *Weekday Summer PM Peak Hour Future Year LOS*

Weekday, Friday, and Sunday summer PM peak hour LOS in 2025, 2031, and 2037 under ‘Baseline’ conditions and with SEIS Alternatives 5 and 6 are reported in the DSEIS and FSEIS (see DSEIS Appendix J and FSEIS **Appendix A** for the results of all these study periods). The weekday summer PM peak hour is used as the basis for mitigation in both the DSEIS and FSEIS. Note that although the FSEIS has been updated to reflect the LOS C standard for WSDOT intersections and to identify noncompliant intersections, the LOS and delay are the same as documented previously in the DSEIS.

The Transportation Analysis Addendum shows that the following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour in 2025, 2031, or 2037 with future ‘Baseline’ conditions, and would continue to operate at non-compliant LOS with SEIS Alternative 5 or Alternative 6 (see Table 8 in FSEIS **Appendix A**):

- #8 - Ranger Station Road / Miller Avenue / W 2<sup>nd</sup> Street (SR 903) – LOS D by 2025 (*identified as non-compliant in 2025 with Alternative 5 or Alternative 6 in DSEIS*)
- #11 - Douglas Munro Boulevard / W 1<sup>st</sup> Street – LOS E by 2025
- #12 - N Pine Street / W 1<sup>st</sup> Street – LOS D by 2025
- #13 - N Stafford Avenue / W 2<sup>nd</sup> Street (SR 903) – LOS E by 2025

The following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour due to the additional traffic generated by SEIS Alternative 5 or Alternative 6:

- #2 - Bullfrog Road / I-90 WB Ramps – LOS D with Alternative 5 or LOS E with Alternative 6 by 2037 (*identified as non-compliant with Alternative 6 only in DSEIS*)
- #3 - Bullfrog Road / Tumble Creek – LOS E with Alternative 5 and LOS F with Alternative 6 by 2037
- #7 - Denny Avenue / W 2<sup>nd</sup> Street (SR 903) – LOS E by 2031
- #9 - N Pine Street / W 2<sup>nd</sup> Street (SR 903) – LOS D by 2025 (*identified as non-compliant in 2031 in DSEIS*)

- #15 - N Oakes Avenue / W 2<sup>nd</sup> Street (SR 903) – LOS D by 2025 (*identified as non-compliant in 2031 'Baseline' in DSEIS*)
- #21 - Pennsylvania Avenue / N 1<sup>st</sup> Street (SR 903) in Roslyn – LOS D by 2031 (*identified as non-compliant in 2037 in DSEIS*)

The following study intersection is anticipated to operate at non-compliant LOS during the weekday summer PM peak hour due to the additional traffic generated by SEIS Alternative 6 only:

- #1 - Bullfrog Road / I-90 EB Ramps – LOS D by 2031 (*identified as non-compliant in 2037 with Alternative 6 in DSEIS*)

The following study intersection is anticipated to operate at non-compliant LOS during the weekday summer PM peak hour due to the additional traffic generated by SEIS Alternative 5 only:

- #17 – Pennsylvania Avenue / W 2<sup>nd</sup> Street – LOS D by 2037 (with Alternative 5 only)

### *SR 903/Pennsylvania Avenue Intersection*

The results of the DSEIS LOS analysis at the intersection of SR 903 at Pennsylvania Avenue in Roslyn showed that the side-street (Pennsylvania Avenue) stop-controlled movements are anticipated to operate at LOS D in 2031 and LOS E in 2037 during the weekday PM peak hour with SEIS Alternative 6. The LOS in these years at this location would exceed the LOS C standard. The need for mitigation has been identified at this intersection to address the anticipated LOS deficiency (see the Mitigation Measures section of FSEIS **Appendix A** and FSEIS **Chapter 1**). A detailed Intersection Control Evaluation (ICE), as required by WSDOT, is being prepared to evaluate the range of potential improvements at the intersection, which could include: no-build/do nothing, all-way stop control, add turn lanes, and signalization. See the discussion in *Sub-section 3-2.2.11, Mitigation & Pro-rata Share*, for details on the ICE for this and other intersections along SR 903 and at the I-90 interchanges.

### *Site Access LOS*

The Transportation Analysis Addendum presents the LOS at the site access intersections during the weekday summer PM peak hour in 2025, 2031, and 2037 with SEIS Alternative 6. During the weekday summer PM peak hour with SEIS Alternative 6, the site access intersection of SR 903/New Connector Road (#30) is anticipated to operate at non-compliant LOS (LOS F) by 2025 (see Table 9 in FSEIS **Appendix A** for details).

### **3-2.2.4 Collision History**

#### **Comments Received**

L-3 (1, 3)

One comment from WSDOT noted that the safety component of the DSEIS transportation analysis did not review crash severity at the study intersections. The comment further suggested that to adequately address the state's Target Zero goals and other WSDOT operational objectives, the full range of crash types and severity must be considered.

### Response to Comments/Updated Information & Analysis

The FSEIS has been updated to include a summary of historical crash data by severity and types of crashes at the study intersections (see Table 11 in FSEIS **Appendix A**). As shown, over the 5-year study period there were no collisions with *Major Injuries* at any of the study intersections, and all crashes were classified as either *No Injury* or *Minor/Possible Injury*.

### **3-2.2.5 RV Resort Trip Generation**

#### Comments Received

L-82 (31), L-99 (6, 33, 34) (repeated in L-94 [1])

Several comments addressed the proposed 47° North RV resort under SEIS Alternative 6 and its trip generation. The Applicant suggested that anticipated RV resort occupancy should be accounted for in the trip generation estimates and analysis. One comment suggested that the RV sites would turn over on weekends, increasing the trips and associated impacts. Another comment expressed concern about RVs traveling through the roundabout at Bullfrog Road and SR 903.

### Response to Comments/Updated Information & Analysis

The trip generation calculations used in the DSEIS traffic analysis for the proposed 47° North RV resort under SEIS Alternative 6 were based on data documented in the Institute of Transportation Engineers (ITE) *Trip Generation* Manual (10<sup>th</sup> Edition) for an RV park. The ITE Manual is generally recognized as an authoritative source of trip generation information used for transportation impact analysis. The trip generation estimates and subsequent LOS analysis documented in the DSEIS for SEIS Alternative 6 assumed 100% occupancy of the RV resort during all time periods evaluated (weekday, Friday, and Sunday PM peak hours of the peak summer months).

As of December 31, 2020, the project Applicant owns and operates 136 RV resorts and 34 hybrid (manufactured home and RV) resorts across the country that are of similar size and character to that proposed under SEIS Alternative 6. Based on operational information provided by the Applicant, the average occupancy of the RV resorts on weekdays during the peak summer months is anticipated to be a maximum of 50%. Applying this occupancy data from similar RV resorts would indicate that the DSEIS weekday PM peak hour trip generation for the RV resort (which used 100% occupancy) is likely overestimated; therefore, the LOS analysis should be considered conservative. With the 47° North RV resort assumed to be 50% occupied during the weekday PM peak hour of the summer peak period, the total SEIS Alternative 6 project trip generation would be reduced by

approximately 84 trips; this is equivalent to a 14% decrease in total weekday PM peak hour trip generation in 2025 and a 7-8% decrease in 2031 and 2037.

The existing roundabout at the intersection of Bullfrog Road and SR 903 is designed to accommodate large design vehicles such as RVs and trucks. Any roundabouts that are constructed as mitigation for the project would need to accommodate RVs and trucks as well.

### **3-2.2.6 Other Project Trip Generation**

#### **Comments Received**

L-99 (32) (repeated in L-94 [1])

Several comments were related to trip generation assumptions for the proposed 47° North residential and RV resort uses under SEIS Alternative 6. One comment indicated that the trip generation for the residential portion of the project assumed typical urban type development trip generation patterns and suggested that the upper County does not follow urban development patterns. Further comments suggested that the project would contain significant amounts of second homes for weekend use and rental, which would have weekend use patterns that would increase trip generation during the Friday and Sunday peak periods.

#### **Response to Comments/Updated Information & Analysis**

For purposes of analysis in this FSEIS, and in response to a comment received on the DSEIS, the Applicant provided information about the possible use of some portion of the single family residential units in 47° North as second/vacation homes. This information is provided for purposes of analysis, should be considered speculative, and could change over time. Although all residential units are planned as primary units, Sun Communities would not exclude potential buyers based on their decision to use a residence as a primary or second home; sales and use of units would be determined by market demand and buyers' preferences. Moreover, it is also considered likely that some proportion of any units initially purchased as second homes would become primary residences over time. Second homes are considered more likely to be single family units, and all the multi-family residential units are, therefore, still assumed to be primary residences. Subject to these caveats, the Applicant estimates that approximately 35% of the single family units could initially be second homes (i.e., 184 units).

The ITE *Trip Generation* manual indicates that the trip generation for recreational or second homes (Land Use Code 260) is lower than single-family homes during the weekday and Sunday PM peak hours, but higher during the Friday PM peak hour. Given the number of single family dwelling units that could potentially be second homes at buildout of 47° North (184 units), there could be some minor reduction in vehicle trips during the PM peak hours on weekdays and Sundays, and some minor increases in trips during the PM peak hour on Fridays during the peak summer period from these residential units. However, as compared

to the failing intersections identified in FEIS Table 10 (**Appendix A and Chapter 1**) no additional intersections are expected to operate at non-compliant LOS during the Friday summer PM peak hour, and no non-compliant intersections are anticipated to operate at compliant LOS during the weekday and Sunday summer PM peak hours as a result of the second homes for any of the study years.

Trip generation of the RV resort is discussed in *Sub-section 3-2.2.5, RV Resort Trip Generation*, above.

### **3-2.2.7 Traffic Model Forecasting & 47° North Project Trip Distribution**

#### **Comments Received**

L-15 (3), L-99 (23, 27, 28, 35) (repeated in L-94 [1])

Several comments related to assumptions in the traffic forecast model that were used to develop baseline traffic volume forecasts and Alternative 6 project trip distribution. It was suggested that the percentage of project trips distributed to/from the north through Roslyn may be too low. It was also commented that identified impacts during the weekday peak period may be overstated while impacts during the Friday and Sunday peak periods may be understated.

One comment indicated that the upper County is not a typical urban area and suggested that the economy, land use, and traffic patterns are primarily driven by recreational use and seasonal tourism.

An additional comment indicated that the upper County/Roslyn area has numerous festivals and events during the peak summer season that are major attractors that affect traffic patterns. The comment further suggested that occupants of and visitors to the proposed development would similarly be attracted to these events and to Roslyn, and that the trip distribution does not appear to account for this and is understated.

There was also a comment that the Safeway at W 1<sup>st</sup> Street and Douglas Munro Boulevard in Cle Elum is the only supermarket and is a major attractor that is magnified by the recreational use patterns on peak summer weekends. The comment questioned whether this effect had been included in the traffic models.

Another related comment suggested that the I-90 mainline widening project at Snoqualmie Pass is inducing more traffic and growth in the upper County area from both permanent residents and recreational use; the comment further questioned whether the traffic growth assumptions included this baseline growth.

#### **Response to Comments/Updated Information & Analysis**

Both the forecasted traffic growth and the distribution of project-generated traffic in the DSEIS traffic analysis accounted for existing traffic patterns during the summer peak season,

which include recreational use and seasonal tourism. Future forecasted baseline traffic volumes were based on existing summer traffic counts plus additional growth. Separate trip distribution patterns were used for the different time periods studied (i.e., weekday, Friday, Sunday) which accounted for the recreational patterns of trips on weekdays and the weekend.

The trip distribution for all the scenarios evaluated in the DSEIS (for future years 2025, 2031, and 2037 during weekday, Friday, and Sunday summer PM peak hours) assumed approximately 10% of SEIS Alternative 6 project trips would be destined to/from the north on SR 903 through Roslyn, based on the Kittitas County Travel Demand Model and local knowledge of trip patterns. The future traffic forecasts and project trip distribution patterns accounted for typical conditions on weekdays, Fridays, and Sundays during the peak summer months. The traffic forecasts did not account for special events such as festivals since it is not standard engineering practice to study conditions that only occur occasionally or are not certain to occur.

The traffic modeling and SEIS Alternative 6 project trip distribution under all scenarios accounted for the relative attractiveness of the existing Safeway grocery store, as well as other retail services located in the downtown Cle Elum area. The traffic forecasting model accounted for attractions in downtown Cle Elum as well as recreational attractions in the upper County and the site vicinity based on existing travel patterns.

Based on information provided by the City's transportation consultant, the Kittitas County regional travel demand model used for the 47° North traffic modeling reflects capacity of the I-90 mainline well in excess of both current and forecasted 2037 traffic volumes during "typical weekday" (non-summer) conditions. Because the County travel demand model bases growth in vehicle trips on land use in the model, and I-90 is not capacity constrained in the model (e.g., the model does not limit vehicle volume assigned to I-90), the I-90 widening project has no effect on traffic forecasts from the model. Summer peak traffic conditions used in the 47° North traffic modeling reflect layering travel model growth on top of existing summer peak intersection counts (collected in summer 2019, before any pandemic-related volume decreases). While there are current congestion issues on the I-90 mainline, these occur primarily on summer weekends.

### **3-2.2.8 47° North Access to Douglas Munro Boulevard**

#### **Comments Received**

L-47 (1), L-94 (5), L-99 (36, 43) (repeated in L-94 [1])

Several comments stated that the 47° North development should provide a new vehicular access connection to Douglas Munro Boulevard for additional emergency access, to provide an additional safe route to the Cle Elum core area, and to reduce impacts to Ronald and Roslyn residents and other residents along SR 903. Other comments suggested that a new road from the site to Douglas Munro Boulevard would help to alleviate traffic congestion at

the intersection of Douglas Munro Boulevard and W 1<sup>st</sup> Street and at the Ranger Station Road intersection with SR 903.

### Response to Comments/Updated Information & Analysis

The 47° North development under SEIS Alternative 6 proposes two access points onto Bullfrog Road (one for the RV resort and one for the new Connector Road through the site) and one access point onto SR 903 for the new Connector Road. The proposed access points on Bullfrog Road and SR 903, and the on-site access roads under SEIS Alternative 6 provide emergency access based on the requirements in the 2021 IFC; no additional emergency access is required. However, in consideration of other residents and neighborhoods in the Cle Elum area, SEIS Alternative 6 includes an emergency access road in the RV resort (RV-2) that extends to the southern site boundary (see FSEIS **Chapter 2, Figure 2-6**). This road could be extended off-site by others. See FSEIS Section 3-5, **Public Services**, for details.

The DSEIS traffic analysis evaluated the transportation impacts of the proposal with the three proposed access intersections and determined that impacts could be mitigated by contribution toward improvements at several off-site intersections that would experience non-compliant LOS during the summer weekday peak periods. With mitigation at the identified study intersections and the proposed site access intersections, the area roadway network is expected to function adequately to serve existing and future traffic growth in the area, as well as the additional traffic generated by SEIS Alternative 6 (see DSEIS Section 3.13, Transportation, and Appendix J, as well as FSEIS **Appendix A**, for details).

### **3-2.2.9 SR 903/47° North Connector Road Access**

#### Comments Received

L-11 (1-3), L-15 (1)

Various comments related to the proposed access point on SR 903 under SEIS Alternative 6 and its relationship to existing intersections and future approved access points for City Heights and Cle Elum Pines in the vicinity. Other comments questioned whether the SR 903 access point would meet WSDOT spacing requirements.

A comment requested that either signalization or use of a roundabout at the site access on SR 903 be evaluated and should consider how the site access intersection operation could affect operations at the other access points along SR 903.

An additional comment from Kittitas County indicated that the location of the proposed access point on SR 903 appears to be close to the new upper county maintenance shop and suggested that consideration be given to large trucks turning in and out.

### Response to Comments/Updated Information & Analysis

The conceptual location of the access point to 47° North from SR 903 under SEIS Alternative 6 (Proposed 47° North Master Site Plan Amendment) differs from that under SEIS

Alternative 5 (the Approved Bullfrog Flats Master Site Plan). The SEIS Alternative 6 SR 903 access point has shifted to the north (see FSEIS **Chapter 2, Figures 2-5 and 2-6**). This access point now has a different relationship to the access points of other existing and future development in the area. SR 903 at the location of the proposed access point under SEIS Alternative 6 is classified by WSDOT as a Managed Access Class 4 rural collector, and the required access spacing is 250 feet on the same side of the highway.<sup>2</sup> There are no access spacing standards related to driveways on the opposite side of the highway. Therefore, the proposed SR 903 access point would meet the minimum spacing requirements.

As identified in the mitigation for SEIS Alternative 6 in the DSEIS and this FSEIS, the 47° North Connector Road access point on SR 903 would require either a compact roundabout or signalization with widening for turn lanes to meet LOS standards (see Table 10 in FSEIS **Appendix A and Chapter 1**). These two possible design options for the SR 903 intersection will be included in an Intersection Control Evaluation (ICE) for WSDOT that will be reviewed as part of a project application and reflected in a new or updated Development Agreement for the 47° North development. The ultimate location and design of the SR 903 access point will be determined by the City and WSDOT through ongoing discussion subsequent to the SEIS and will also address truck maneuvering along SR 903.

### **3-2.2.10 Connector Road through the Site**

#### **Comments Received**

L-15 (2)

A comment from Kittitas County on the Connector Road through the 47° North development site suggested that its design should consider more intersections and a winding geometry so that it would not be used as a cut-through route.

#### **Response to Comments/Updated Information & Analysis**

The Connector Road through the site (connecting Bullfrog Road and SR 903) under SEIS Alternative 6 is now anticipated to be a minor collector with a speed limit of 25 to 30 mph. The evolving design of the Connector Road is intended to provide vehicular and emergency access and circulation within the 47° North development and adjacent commercial parcel, and to discourage non-project background traffic from using the road to cut through the site, instead of using SR 903 and Bullfrog Road.

The Connector Road design included in the SEIS features a 40-foot-wide road section (with two 14-foot drive lanes and a 12-foot center turn lane), a winding layout, and multiple internal access road connections to 47° North neighborhoods (see **Chapter 2, Figure 2-6 and 2-14** for the proposed Master Site Plan and road cross sections, respectively). To further discourage non-project traffic from using the Connector Road as a cut through route, the road design could include: narrower lanes (10-foot minimum), a lower speed limit, and

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<sup>2</sup> WSDOT Design Manual 540.03(4)(b)

other traffic calming measures. Therefore, the DSEIS transportation analysis assumed that drivers not destined to and from the 47<sup>th</sup> North development or the adjacent commercial parcel would continue to use Bullfrog Road and SR 903 instead of the Connector Road.

### **3-2.2.11 Mitigation & Pro-Rata Share**

#### **Comments Received**

L-3 (4, 5, 6), L-11 (4), L-12 (1, 3), L-13 (3-6) L-14 (6), L-15 (4), L-47 (1), L-58 (1), L-92 (7), L-94 (5), L-99 (3, 18, 24, 29, 30, 37-42, 44) (repeated in L-94 [1])

Multiple comments were related to the transportation mitigation in general, specific mitigation alternatives identified, and the pro-rata share methodology and calculations for the identified mitigation in the DSEIS.

Comments on the DSEIS from WSDOT note that completion of an Intersection Control Evaluation (ICE) analysis is required for each study intersection on SR 903 or I-90 where mitigation is proposed to evaluate mitigation alternatives.

Other comments noted that the pro-rata methodology and financial contribution of mitigation should consider background trips so that the financial burden does not fall solely on the proposed development.

Comments from the Applicant indicated that the pro-rata mitigation methodology should identify intersection failures in the background condition so that mitigation is not the sole responsibility of the proposed development. They also commented that the methodology should capture the additional capacity that is gained from future improvements so that the development is not solely responsible for the entirety of the cost of the improvement. An additional comment the Applicant made suggested that the RV occupancy is lower on weekdays based on historical data and should be included in the updated pro-rata calculations.

A comment suggested that traffic mitigation plans and timetables for intersection improvements be part of the approval process.

Another comment noted that the pro-rata contributions only compare weekday summer PM peak hour conditions, and that Friday and Sunday summer PM peak hour conditions are not compared, and further suggested that additional intersections be evaluated for mitigation during the Friday and Sunday PM peak hours. A comment stated that it disagreed that it is standard engineering practice to base mitigation on weekday summer peak hour.

Another comment suggested that Bullfrog Road should be widened to accommodate the increase in traffic with 47<sup>th</sup> North.

Other comments questioned how the mitigations would be funded and when they would be made and asked that any costs allocated to the City or County be identified.

### Response to Comments/Updated Information & Analysis

The transportation Mitigation Measures section in the DSEIS identified improvements at the site access intersections and off-site study intersections necessary to mitigate the adverse transportation impacts of SEIS Alternative 5 and Alternative 6 (see DSEIS Section 3.13, Transportation, and Appendix J). The transportation Mitigation Measures section in the FSEIS has been updated to address some of the public and agency comments, and to introduce an alternative method that could be used to calculate proportionate (pro-rata) responsibility and relative shares for funding needed improvements (see FSEIS **Appendix A** and FSEIS **Chapter 1**).

Consistent with standard engineering practices, the mitigation measures identified in the both the DSEIS and FSEIS are based on future traffic volumes with the project (47° North and possible commercial development) during the weekday summer PM peak hour. Although mitigation to address LOS deficiencies during the Friday and Sunday summer PM peak hours were not specifically identified, mitigation identified at the study intersections to mitigate weekday PM peak hour operations would result in improved operations during the Friday and Sunday PM peak hours as well. It is common traffic engineering practice to identify mitigation and cost allocation during the weekday PM peak period. Disagreement with this approach in a comment is acknowledged.

The FSEIS identifies two different pro-rata shares methods to fund the identified mitigations: Method A (Developer Responsibility) and Method B (Shared City/Agency/Developer Responsibility) (see Table 10 in FSEIS **Appendix A** and in FSEIS **Chapter 1**). Both these methods, as well as other potential pro-rata share methods, are used by transportation professionals to identify pro-rata share responsibilities, and both will be considered by the City. Method A is the pro-rata share method identified in the DSEIS that assumes any improvements required as a result of added traffic from SEIS Alternative 6 would be the responsibility of the proposal(s) that caused a particular intersection to become non-compliant; background growth is not considered. In this approach, responsibility would be shared proportionately between 47° North and the possible commercial development. Method B is an alternative pro-rata method that identifies mitigation responsibilities and proportional contributions as shared between the project (47° North and possible commercial development) and agency(s) (i.e., City of Cle Elum, City of Roslyn, Kittitas County, and/or WSDOT). This approach looks at the totality of trips that contribute to an intersection's non-compliant LOS and allocates proportional shares to the proposal and to background growth (contributing cities/agencies).

There are also other potential pro-rata share methods or refinements that could be applied to fund transportation mitigation. For example, existing traffic volumes could be removed from the "Background Share" which would allocate the pro-rata share responsibility only to future traffic volume growth (removing existing traffic) and would result in a larger

proportional responsibility for 47° North and the possible commercial development. This potential pro-rata method could be incorporated into Method A or B described above. The final pro-rata share method and calculations for the 47° North development and possible commercial development are anticipated to be defined in a new or updated Development Agreement.

The pro-rata share calculations in the FSEIS account for two possible occupancy scenarios for the 47° North RV resort during the summer weekday PM peak hour: 100% occupancy of the resort (consistent with the DSEIS), and 50% occupancy of the resort (based on new data provided by the Applicant at existing, similar RV resort properties of theirs in the U.S.). The results indicate that with 50% occupancy of the RV resort, the pro-rata share of mitigation identified for 47° North would be similar to or less than with 100% occupancy of the resort (see Table 10 in FSEIS **Appendix A** and in FSEIS **Chapter 1**).

The FSEIS identifies potential mitigation measures and preliminary pro-rata share estimates for intersections that would operate at non-compliant LOS (see Table 10 in FSEIS **Appendix A** and in FSEIS **Chapter 1**). A total of 11 study intersections that are anticipated to operate at a non-compliant LOS under future weekday summer PM peak hour conditions in 2025, 2031, or 2037 due to 'Baseline' conditions or SEIS Alternative 6 project traffic are included. The FSEIS also identifies potential improvements to mitigate the non-compliant LOS at each of the 11 intersections (see Table 10 in FSEIS **Appendix A** and in FSEIS **Chapter 1**). Although improvements to mitigate future non-compliant LOS have been preliminarily identified, the specific form of mitigation, the pro-rata share cost of the mitigation, and the timing of the improvements will be based on discussions and evaluations between the project Applicant, the City of Cle Elum, Kittitas County, WSDOT, and the City of Roslyn. The selected improvements and their timing will be incorporated into a new or updated Development Agreement between the Applicant and the City of Cle Elum and will be addressed in subsequent updates to the appropriate City transportation plans and capital improvement programs.

The FSEIS refers to Intersection Control Evaluation (ICE) analysis documents at WSDOT study intersections forecast to operate at non-compliant LOS with the project (see FEIS **Appendix A**). The ICE analyses, which are currently underway, will be used by WSDOT and the Cities of Cle Elum and Roslyn to determine the preferred improvement at these intersections. The range of improvements to be considered include compact roundabout, signalization, lane widening, and turn restrictions. The details of the improvements will be established during review of a project application and reflected in a new or updated Development Agreement for the 47° North project.

The transportation Mitigation Measures section in the FSEIS also identifies a Monitoring Program that has 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 possible development of the commercial parcel; and,
- C. Help establish or confirm the timing, location, and nature of required transportation improvements and consider the pro-rata share calculations.

(See FSEIS **Appendix A** and in FSEIS **Chapter 1**.)

The Traffic Monitoring Program for the 47° North RV resort and residential development is anticipated to be implemented through buildout of the project, which is expected to occur in 2028. Monitoring of 47° North could, for example, be conducted twice, in 2024 (prior to anticipated completion of the RV resort) and in 2027 (prior to anticipated completion of the single family housing). The specific details of the Monitoring Program, including the number of phases and duration of monitoring, appropriate timing of phases of monitoring, time periods to be counted, key locations to be counted, and reporting requirements will be coordinated with the City and other agencies, and included as part of the new or updated 47° North Development Agreement. The traffic Monitoring Program for the possible commercial development cannot be determined at this time, as this development is considered speculative and has only been included in the SEIS for analysis purposes. Once plans for the commercial development are submitted to the City, a Monitoring Program for that development could be developed (see FSEIS **Appendix A** for details).

### **3-3. HISTORIC & CULTURAL RESOURCES**

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#### **3-3.1 2020 DSEIS**

DSEIS Section 3.10, Historic & Cultural Resources, and Appendix I discussed existing historic and cultural resource conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on historic/cultural resources, and identified mitigation measures to address impacts.

The DSEIS concluded that cultural resources could potentially be impacted or destroyed by proposed site development under SEIS Alternatives 5 and 6. Significant impacts to known cultural resources are not expected because archaeological sites that are located onsite have been determined to be not eligible for listing on the National Register of Historic Places (NRHP) or Washington Heritage Register (WHR). Large areas of open space would be preserved, including along the Cle Elum River where most of the previously recorded sites were located.

#### **3-3.2 2021 FSEIS**

Additional information and analysis are provided in this FSEIS to respond to the key comments on cultural resources. This information/analysis is summarized in the responses below; the full analysis is contained in FSEIS **Appendix B**, Updated Cultural Resources Report.

##### **3-3.2.1 Cultural Resources Analysis Methods & Assumptions**

###### **Comments Received**

L-1 (1-4), L-6 (2-4, 9-12, 14)

The Washington State Department of Archaeology and Historic Preservation (DAHP) and the Yakama Nation expressed concerns about the methods and assumptions used for the cultural resources analysis. They asked about: the sequence of operations (e.g., geotechnical trenching before shovel surveys); whether the number of shovel tests that were performed were sufficient; whether any of the geotechnical trenching/cultural resources subsurface testing occurred within the boundaries of any previously recorded cultural resources sites or previously or newly documented archaeological sites; and the locations of the transects used for the pedestrian survey. The Yakama Nation commented on the lack of contact with them to receive input on the analysis. A question was also raised regarding a cultural resources survey for possible commercial development on the adjacent 25-acre property.

## Response to Comments/Updated Information & Analysis

The SEIS cultural resources consultant attempted to contact cultural resources staff at Yakama Nation in November 2019 (S. Kleinschmidt, CRC Project Manager, electronic transmittal 11/13/19, to J. Meninick, Yakama Nation) to receive input prior to preparing the 47° North DSEIS Cultural Resources Report. However, no response was received. Yakama Nation was contacted and their DSEIS comments discussed on October 23<sup>rd</sup> and 27<sup>th</sup>, 2020; DAHP was contacted and their DSEIS comments discussed on October 15, 2020.

As discussed with DAHP, the field methodology section of the Updated Cultural Resources Report has been revised to provide more detailed rationale about the number and distribution of shovel probes implemented for the archaeological survey. DAHP clarified that their comment regarding the sequence of operations was primarily intended for future projects in the City of Cle Elum. As described in the Updated Cultural Resources Report, data from archaeological monitoring was used to target locations with a higher likelihood of containing Holocene loess (soil deposited during the Holocene time period) that could potentially have intact archaeological material. The revised report indicates that the number of shovel test probes that were used (23) is considered adequate for several reasons: 1) there have been seven prior investigations throughout the project site since 1996, consisting predominantly of surface survey but also including some subsurface testing; 2) widespread surface glacial deposits were observed during monitoring by the SEIS cultural resources consultant of geotechnical exploration pits (archaeological deposits would not occur below these Upper Pleistocene deposits); and 3) previously recorded precontact sites in the site vicinity are generally located on the lower terrace near the Cle Elum River, which is within the designated open space area that would not be developed under the SEIS Alternatives (see FSEIS **Appendix B** for details).

Several maps and a table have been added to the Updated Cultural Resources Report to address DAHP's and the Yakama Nations' comments regarding the methodology and assumptions used for the cultural resources analysis. A map has been included showing locations of previously recorded sites in relation to geotechnical test trenches (see FSEIS **Appendix B**, Figure 5). As shown, none of the geotechnical trenching activities occurred within the boundaries of a previously recorded site. A map with the transect locations that were followed for the pedestrian survey of the site has been added (see FSEIS **Appendix B**, Figure 6). An overlay map of subsurface testing in relation to previously identified archaeological sites and newly documented sites has been included (see FSEIS **Appendix B**, Figure 18). As shown, none of the subsurface testing occurred with the boundaries of the previously or newly recorded sites. The updated report also clarifies that boundary delineation and evaluative testing of previously recorded sites were not included in the 47° North cultural resources analysis. Finally, maps and a table showing the 15 previously recorded archaeological sites have been added to the revised report (see FSEIS **Appendix B**, Figures 23 – 37, and Table 4).

Development of the 25-acre commercial property adjacent to the site is not proposed at this time and is considered possible but uncertain. The Updated Cultural Resource Report

clarifies that a cultural resources survey will be conducted when development is proposed on the property. This provision is also included as a mitigation measure in the DSEIS and FSEIS (see **Chapter 1**).

### **3-3.2.2 Cultural Resources Information & Mitigation**

#### **Comments Received**

L-6 (1, 5-8, 13)

The Yakama Nation provided additional/updated information and requested clarifications in be provided in a Revised Cultural Resources Report. They also questioned the appropriateness of the cultural resource mitigation measures listed in the DSEIS.

#### **Response to Comments/Updated Information & Analysis**

##### *Information from Yakama Nation*

The additional/updated information provided by the Yakama Nation has been included in the Updated Cultural Resources Report (see FSEIS **Appendix B**), including the following.

**Treaty Reserved Rights.** The site is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855. The Treaty between Yakama Nation and the United States Government set forth that Yakama Nation shall retain rights to resources upon lands defined therein as Ceded Lands and Usual and Accustomed Places. These Treaty Reserved Rights have been defended and affirmed at the highest level of our judicial system. Yakama Nation continues to exercise Treaty-Reserved Rights to protect traditional resources.

**Cle Elum.** The name Cle Elum comes from Native names for the river. The Cle Elum River is a traditional use area. Its native place name is *tlelam* meaning “water passing through bluffs” or “converging ridges that open up into a valley”. Historic documents indicate the place name of *tle-el-lum* is derived from the native inhabitants’ name for the river, its meaning being “swift water”.

**Contact with MountainStar Staff.** A question was raised about the following statement in the DSEIS Cultural Resources report (DSEIS Appendix I): “Yakama Nation were interviewed to assist in the identification of cultural resources within the UGA.” The quoted statement in the DSEIS was about contact between MountainStar staff and Yakima Nation that occurred for the 2002 Cle Elum UGA EIS. This was clarified in FSEIS **Appendix B**.

**Western Stemmed Tradition.** The Western Stemmed Tradition from which lithic material and points have been found in the Yakima Basin predates or is contemporaneous with the Clovis Tradition (Western Stemmed Tradition: ca. 13,000 to 11,000 B.P. [Before Present]; Clovis Tradition: 11,500(?) to 11,000 B.P.).

## *Mitigation Measures*

The mitigation measures included in the DSEIS and FSEIS (see FSEIS **Appendix B** and FSEIS **Chapter 1**) are considered appropriate and commensurate with the identified impacts to cultural resources because no significant impacts to cultural resources are expected with construction or operation of SEIS Alternatives 5 and 6. Impacts were considered to be significant if they pose a risk, whether direct or indirect, to documented archaeological or historic resources eligible or potentially eligible for listing on the National Register of Historic Places and/or the WHR. Historic register status of archaeological and historic sites was identified from prior determinations of eligibility issued by DAHP and results of prior cultural resources investigations. No such impacts were identified. The mitigation measures in the Updated Cultural Resource Report (FSEIS **Appendix B**) and FSEIS **Chapter 1** have been updated to include a clear statement regarding when state law requires an Archaeological Site Alteration and Excavation Permit.

### **3-3.2.3 Protocols for Communication/Documentation**

#### Comments Received

L-1 (5, 6)

DAHP requested that the agency receive copies of correspondence or comments related to historic and cultural resource and sharing the DAHP Project Number.

#### Responses to Comments/Updated Information & Analysis

Copies of correspondence or comments from concerned tribes and other parties related to historic and cultural resources will be forwarded to DAHP. The DAHP Project Number will be shared with any hired cultural resource consultant and attached to any communication or submitted reports.

## **3-4. UTILITIES**

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### **3-4.1 2020 DSEIS**

DSEIS Section 3.14, Utilities, and Appendix B discussed existing utilities (e.g., sewer, water, solid waste) conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on utilities, and identified mitigation measures to address impacts.

The DSEIS analysis concluded that SEIS Alternatives 5 and 6 would generate demand for water, sewer, and solid waste service during construction and operation of the project. Water and sewer service would be provided by City of Cle Elum. The capacity of the City's water treatment plant is 6 million gpd with room for expansion to 8 million gallons per day (gpd). The City's water system would require improvements to serve the SEIS Alternatives (i.e., a filter train in the water treatment plant, a finished water pump in Zone 3, and a reservoir in Zone 3). The capacity of the regional Wastewater Treatment Plant (WWTP) is 3.6 million gpd; the WWTP has adequate capacity to serve the SEIS Alternatives. Solid waste service for the project would be provided by Waste Management of Ellensburg; waste would be hauled to the Cle Elum Transfer Station prior to transport to the Greater Wenatchee Land Fill for final disposal. The Transfer Station is reported to be near capacity and improvements could be required to accommodate the SEIS Alternatives.

### **3-4.2 2021 FSEIS**

Additional information and analysis are provided in this FSEIS to respond to the key comments on utilities. This information/analysis is summarized in the responses below; the full analysis is contained in FSEIS **Appendix C**, Updated Supplemental Site Engineering Report (SETR).

#### **3-4.2.1 Water & Sewer Demand**

##### **Updated Information**

The Applicant questioned the assumptions used in the water and sewer demand analysis in the DSEIS and provided alternative data for analysis in the FSEIS.

##### **Response to Comments/Updated Information & Analysis**

##### *Water*

In the DSEIS, water demand from the single and multi-family manufactured homes and RV units under SEIS Alternative 6 was based on the Washington State Department of Health (DOH), Water System Design Manual standards, equating to 211 gpd for single and multi-family, and 75 gpd for RV units. The demand for the single and multi-family units was comparable to historical City of Cle Elum single family home water demand data of 207

gpd. However, this was considered to be a very conservative approach as manufactured homes historically have less demands than single family homes, based on national data.

For the FSEIS, the Applicant provided a substantial amount of water demand data from over 60 Sun Community resorts across the country. The City engineer reviewed this data, and revised SEIS Alternative 6's projected water demands, including factor of safety provisions, equating to 170 gpd for single- and multi-family, and 60 gpd for RV units (see **Table 3-1**). These rates are higher than any of the other Sun Community resorts, and so still are considered conservative, but are lower than Cle Elum's historical single family demands of 207 gpd.

**Table 3-1**  
**UPDATED SINGLE FAMILY & RV UNIT WATER DEMAND – SEIS ALTERNATIVE 6**

Type of Unit	ADD <sup>1</sup> /Service (GPD)	Peaking Factor	MDD <sup>2</sup> /Service (GPD)
Single Family, Manufactured Homes	170	2.0	340
RV Units	60	2.0	120
Cle Elum Single Family Homes (incl. irrigation)	207	3.3	680

**Source: HLA Engineering, 2020.**

<sup>1</sup> ADD = Average Daily Demand.

<sup>2</sup> MDD = Maximum Daily Demand.

Updated information for SEIS Alternative 6 includes the average daily treated water demands of the RV and residential development at full buildout in 2037; the average daily treated water demands of the possible commercial development in 2037; the maximum month treated water demands of the RV and residential development; and the maximum month treated water demands of the possible commercial development (see FSEIS **Appendix C**, Tables 3.3, 3.4, 3.6, and 3.7, respectively). Consistent with the conclusion reached in the DSEIS, the treated water demand under SEIS Alternative 6 was determined to be lower than under FEIS and SEIS Alternative 5 due to less development.

## Sewer

Based on the updated water demand information noted above for Alternative 6, the estimated wastewater generation is estimated to be 170 gpd for manufactured single family and multi-family units and 60 gpd for the RV units. The wastewater generation estimated for the future commercial property would continue to be the same as in the DSEIS: 0.068 gpd per square foot of the building. The monthly wastewater flow under SEIS Alternative 6 at buildout in 2037 was updated (see FSEIS **Appendix C**, Table 4.3). As concluded in the DSEIS, the monthly wastewater flow under SEIS Alternative 6 would be less than for FSEIS and SEIS Alternative 5.

The estimated wastewater loadings under SEIS Alternative 6, in terms of biochemical oxygen demand (BOD) and total suspended solids (TSS), would be the same as estimated in the DSEIS (see DSEIS Section 3.14, Utilities, and Appendix B).

### **3-4.2.2 City Utility System Capacity**

#### **Comments Received**

L-82 (8-15, 22), L-99 (16) (repeated in L-94 [1])

Several comments questioned whether the City's water and sewer systems have the capacity to handle the 47° North project, together with other recently approved projects in the water and sewer service areas (e.g., City Heights and Cle Elum Pines). Requests were made for information on the allocation of capacity between the water system partners, and clarification on the responsibilities for new improvements to the system. Comments also addressed the City of Cle Elum Wastewater Treatment Plant (WWTP) National Pollution Discharge Elimination System (NPDES) permit; how the Horse Park is served by sewer; and how Suncadia wastewater flows are measured.

#### **Response to Comments/Updated Information & Analysis**

The Updated Supplement to the Engineering Technical Report, including the Updated Water System Analysis, prepared for this FSEIS addresses many of the comments related to the City's water and sewer system capacity (see FSEIS **Appendix C**). The conclusions from the report/memo, including additional discussion of the sewer system, are provided below.

#### ***Water***

Based on the updated water demand described above under *Sub-section 3-4.2.1, Water & Sewer Demand*, the City engineer updated the Water System Analysis. SEIS Alternative 6 together with City Heights (the other major approved development project in the City) were analyzed in 2037. Like the analysis in the DSEIS, the updated analysis determined that the existing City water system would require system improvements to meet projected water demand and storage requirements with SEIS Alternative 6 and City Heights. The updated analysis concluded that the same three improvements identified in the DSEIS would need to be provided to address water system deficiencies: 1) a filter train in the water treatment plant, 2) a finished water pump in Zone 3, and 3) a reservoir in Zone 3. Based on the updated analysis, SEIS Alternative 6 would be responsible for approximately 53% of these improvements based on the water demand under this alternative, versus the approximately 59% estimated in the DSEIS (see FSEIS **Appendix C** for details). The residential and RV component of 47° North would be responsible for approximately 90% and the possible commercial development approximately 10%<sup>3</sup> of the 53%.

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<sup>3</sup> Note that hypothetical development of the 25-acre property adjacent to the site is studied in this SEIS to understand the potential impacts of this development, including the cumulative impacts of the development together with development of 47° North and other vested projects in the City. No development is proposed for the property at this time; therefore, the assumptions are considered speculative and could change. The allocation of the commercial development's responsibility for

Projected water demand would be translated into actual consumption as the development phases 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 for 47° North and City Heights.

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.

## Sewer

The DSEIS discussed the regional WWTP and concluded that the wastewater treatment demand under SEIS Alternatives 5 and 6 would be within the overall capacity of the WWTP, which was designed to accommodate the project. However, the DSEIS did not discuss allocation of capacity in the WWTP to regional partners, which was raised in a comment. The allocation of sewer system capacity among regional partners is addressed in an agreement that was entered into in 2002 between the City of Cle Elum, Town of South Cle Elum, City of Roslyn, and Trendwest Investments (the former owners of the Suncadia resort). The current agreement is the fourth amendment and was executed on June 19, 2008, following annexation of the Trendwest/Bullfrog Flats UGA area (now known as 47° North) into the City of Cle Elum in 2006. The capacity in the WWTP is calculated based on ERUs (Equivalent Residential Units), which are ultimately tied to building permits. Individual partner’s allocation may be increased through transfer/purchase of capacity from other partners, or through expansion of the WWTP.

**Table 3-2** summarizes: the ERUs allocated to the partners; the ERUs reported by the partners in 2020; the current balance; the ERUs estimated for 47° North, City Heights, and Cle Elum Pines; and, the future balance at buildout of these three projects. As shown, at buildout of the three projects there would be capacity remaining in the overall WWTF (2,627 ERUs). However, City of Cle Elum would exceed its allocation by 11 ERUs and South Cle Elum would exceed its allocation by 28 ERUs. Note that the actual ERU value (gallons per day) changes over time as water demands change with climate, conservation, land use/zoning/uses, etc., so it is important to continually track usage and project future deficiencies, if any. The potential deficiencies shown in **Table 3-2** could be addressed through a re-allocation of WWTP capacity among the regional partners. Alternatively, if the WWTP reaches capacity before buildout of 47° North, City Heights and Cle Elum Pines,

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water system improvements accounts for some variations in the possible uses in the future commercial development (e.g., all office park vs. the breakdown of grocery, retail, restaurant, and medical office studied in the SEIS).

improvements to the facility would need to be made to serve the projects and responsibility for funding the improvements determined.

**Table 3-2  
WASTEWATER TREATMENT FACILITY CAPACITY ALLOCATION**

Community/Partner	ERU Allocation <sup>1</sup>	2020 Reported ERUs	Current Balance	47° North (Buildout) <sup>2</sup>	City Height (Buildout)	Cle Elum Pines (Buildout)	Future (Buildout) Balance
Roslyn/Ronald	1,050	819	231	--	--	--	231
Cle Elum	3,390	1,332	2,058	1,083	962	24	-11
South Cle Elum	355	383	-28	--	--	--	-28
Suncadia MPR	3,787	1,352	2,435	--	--	--	2,435
Total	8,582	3,886	4,696	1,083	962	24	2,627

**Source: HLA Engineers, 2021.**

<sup>1</sup> The ERU allocation is based on 2008 amendment to the allocation agreement.

<sup>2</sup> The 47° North ERUs are based on December 2020 Water System Analysis Memo prepared by HLA (see FSEIS **Appendix C**).

<sup>3</sup> The City Heights ERUs are subject to the terms of Development Agreement for the project.

<sup>4</sup> The Cle Elum Pines remaining ERUs are based on calculations by the City Engineer.

The monetary value of each new ERU and the 2002 existing regional ERUs prior to the WWTP construction created by the WWTP was established in Exhibit 6 of the fourth amendment of the sewer system capacity agreement, using the cost to construct the new WWTP. In accordance with the current agreement, all new sewer connections pay the capital reimbursement charge based on ERUs, including those associated with subdivisions such as the Cle Elum Pines West development. The City Heights development will be invoiced for the reimbursement charges as part of the building permitting process.

The City of Cle Elum Regional WWTP NPDES Permit can be found at:

<https://apps.ecology.wa.gov/paris/FacilitySummary.aspx?FacilityId=8169652>

The Horse Park is connected to the City of Cle Elum sanitary sewer system.

Suncadia measures its wastewater flows through flow meters installed in manholes where the sewer mains connect to the City of Cle Elum's sewer system.

### **3-4.2.3 Solid Waste Facility Capacity**

#### **Comments Received**

L-92 (2), L-99 (15, 21) (repeated in L-94 [1])

One comment asked for confirmation that the "garbage dump" was at capacity. Another comment indicated that the DSEIS analysis of the impacts of the SEIS Alternatives on the transfer station capacity was inadequate and should include analysis of vehicle queue lengths. The commenter also requested that the costs of improvements to the transfer station, and the Applicant's responsibility for these costs, be provided.

## Response to Comments/Updated Information & Analysis

As described in the DSEIS, solid waste collection in the site vicinity is presently provided by Waste Management of Ellensburg. Wastes are hauled to the Cle Elum Transfer Station prior to transport to the Ryegrass Land Fill for final disposal. In the DSEIS, the Cle Elum Transfer Station was reported to be near capacity based on the number of cars queued at the station on Saturdays. It was noted that Kittitas County Solid Waste indicated that they were working on another entrance to improve queuing. They also indicated that they were working on expanding the land fill (see DSEIS Section 3.14, Utilities, and Appendix B).

The DSEIS conveyed that the quantities of solid waste generated by SEIS Alternative 6 would be less than by SEIS Alternative 5; however, both would contribute to the possible need for improvements to the Cle Elum Transfer Station. The DSEIS included the following mitigation measure: “The Applicant would contribute a pro-rata share to construct improvements to the solid waste transfer station, consistent with the *Kittitas County Solid Waste Management Plan (SWMP) Amendment for the Trendwest (now New Suncadia) Master Plan Resort and UGA* (November 2000)” (see DSEIS Section 3.14, Utilities, and Appendix B, and FSEIS **Appendix C** for details).

Based on further investigation into the County SWMP Amendment for Trendwest (Agreement #2, July 2002), it is now established that Trendwest/New Suncadia has been making payments for improvements to the Kittitas County Solid Waste system to offset impacts from Suncadia as well as the UGA (including the 47° North development). These payments will be completed in July 2022. Therefore, this mitigation is not required for the current proposal and has been removed from the mitigation list in FSEIS **Chapter 1**.

No further analysis of the impacts of the project on the Cle Elum Transfer Station, including vehicle queue lengths, was determined to be necessary for this FSEIS. Kittitas County Solid Waste already has plans to improve queuing at the transfer station and is in the process of updating their Solid Waste Management Plan. At this point, the County does not have any specific plans for expanding the existing transfer station or building a new transfer station to address the capacity of the Cle Elum Transfer Station. Therefore, any further project-specific financial responsibility of 47° North for solid waste infrastructure improvements cannot be determined at this time.

## **3-5. PUBLIC SERVICES**

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### **3-5.1 2020 DSEIS**

DSEIS Section 3.12, Public Services, discussed existing public services (e.g., police, fire, emergency medical/hospital, and schools) conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on public services, and identified mitigation measures to address impacts.

The DSEIS concluded that SEIS Alternatives 5 and 6 would generate additional demand for public services during the construction and operation phases. Overall, SEIS Alternative 6 would result in fewer permanent residents, less commercial development, a shorter buildout period and reduced demand for public services compared to SEIS Alternative 5. The RV visitor population under SEIS Alternative 6 would also generate some demand for public services; however, the visitors would not impact schools. With implementation of the mitigation measures listed in the DSEIS, significant impacts to public services were not anticipated.

### **3-5.2 2021 FSEIS Updated Information & Analysis**

#### **3-5.2.1 Emergency Access**

##### Comments Received

L-47 (1), L-60 (5), L-87 (4), L-94 (5)

The most frequent comments on public services related to impacts on emergency access in upper Kittitas County, particularly with the additional traffic from the 47° North project.

##### Response to Comments/Updated Information & Analysis

The proposed access points and on-site access roads under SEIS Alternative 6 provide adequate emergency access based on the 2021 International Fire Code (ICF) (Appendix D); no additional emergency access is required for the 47° North proposal. However, to enhance public safety for other neighborhoods in the Cle Elum area, SEIS Alternative 6 includes an emergency access road in the RV resort (RV-2) that extends to the southern site boundary. This emergency access road is described and shown in DSEIS and FSEIS **Chapter 2** (see **Figures 2-6** and **2-14**). The City and the Horse Park could extend this road off-site through the Horse Park and connect to Douglas Monro Boulevard.

The affordable housing site under SEIS Alternative 6 is shown with access provided from the single family residential area (SF-1) to the north (see DSEIS and FSEIS **Figure 2-6**). Additional emergency access is not required for the affordable housing site based on the 2021 ICF. However, to enhance public safety for other development in the Cle Elum area, an emergency access road could be provided by the City from the affordable housing site

access road through the cemetery expansion site. Alternatively, a road could be extended off-site through the Horse Park. Either of these routes could connect to Douglas Munro Boulevard.

Therefore, even though additional emergency access is not required for the 47° North project under SEIS Alternative 6, the conceptual Master Site Plan would provide for emergency access to be extended through the site. With off-site extensions, emergency access could be provided from Bullfrog Road and SR 903 to Douglas Munro Boulevard for other neighborhoods in the Cle Elum area.

### **3-5.2.2 General Demand for Public Services**

#### **Comments Received**

L-29 (3, 4), L-41 (1), L-47 (2), L-58 (4), L-60 (2, 4, 5), L-82 (30), L-87 (3), L-92 (3, 6), L-94 (4) L-99 (1, 2, 4, 12-14, 19-21) (repeated in L-94 [1])

Many comments raised concerns about the project's general impacts on public services (i.e., police, fire, schools, hospitals, and emergency dispatch), particularly given the size of the proposed development. Some comments questioned the methods used for the public services analysis. A few comments asserted that the cost and funding of public services impacts, including the 47° North project's responsibility, should be discussed in the SEIS.

#### **Response to Comments/Updated Information & Analysis**

The DSEIS public services analysis was conducted using standard and generally accepted evaluation methods for EISs/SEISs. Information for the public services analysis was obtained through research and personal communications with the affected agencies (i.e., police, fire/Emergency Medical Service (EMS), hospital, emergency dispatch, and schools). When the DSEIS was prepared, and currently, none of the public service purveyors that serve the site had formally adopted quantitative Level of Service (LOS) standards. In addition, long-range planning documents (e.g., capital facilities plans) were not, and still are not, available from most of the purveyors. In the absence of this information, it was generally assumed for purposes of analysis in the DSEIS, that staffing needs for police, fire/EMS, hospital, and KITTCOM would increase in direct proportion to population increases under the SEIS Alternatives. This is a common and accepted method for analyses of public services in EISs in the absence of adopted LOS standards. The analysis of the impacts of the SEIS Alternatives on school service was based on school capacities, existing and projected enrollment, and student generation rates provided by the Cle Elum-Roslyn School District. As appropriate, the need for equipment and facilities with the SEIS Alternatives was also described (see DSEIS Section 3.12, Public Services, for details).

It is acknowledged that development under the SEIS Alternatives would substantially increase the population in City of Cle Elum (see DSEIS Section 3.9, Housing, Population, and Employment for details), which in turn would increase demand for public services. However, as noted previously in this chapter, SEIS Alternative 6, the Proposed 47° North

Master Site Plan Amendment (the current proposal) would increase the City's permanent population less than SEIS Alternative 5, the Approved Bullfrog Flats Master Site Plan (the currently approved development on the site) and would generally have less impacts on public services.

The DSEIS evaluated existing and planned public services in the site vicinity. Existing deficiencies in the services, as well as deficiencies that would result from or that the SEIS Alternatives would contribute to were described for the study years (2025, 2031, 2037, and 2051), and appropriate mitigation identified (see DSEIS Section 3.12, Public Services for details).

An analysis of the costs/revenues associated with the SEIS Alternatives was provided in the DSEIS (see DSEIS Section 3.15, Fiscal & Economic Conditions, and Appendix K), and is updated in this FSEIS (see FSEIS Section 3-7, **Fiscal & Economic Conditions**, and FSEIS **Appendix E** for details). The cost side of the fiscal analysis addresses impacts to public services from the SEIS Alternatives.

This FSEIS identifies the estimated cost of facilities – including water facilities and road improvement options – where facility plans are current and sufficiently advanced to make such estimates realistic and possible (see *Estimated Costs of Facilities* below). Some of this information will be developed or refined after the SEPA process, however. The SEPA Rules do not require that methods of financing public services and capital infrastructure be included in an SEIS; please refer to WAC 197-11-448. Project-specific responsibility for improvements will be discussed and assigned during review of a Master Site Plan application and preparation of a new or updated Development Agreement. Specific financing methods will be considered in the context of ongoing City planning and budgeting processes.

### *Estimated Costs of Facilities*

**Police.** The Cle Elum Police Department calculated the police staff and equipment required for development under SEIS Alternatives 5 and 6 using what is referred to as the International City/County Management Association (ICMA) method. The ICMA method is not based on increased population and results in a greater number of officers than the officer/population method presented in the DSEIS and greater associated costs. In their comments on the DSEIS, the Cle Elum Police Department indicated that expanded or new departmental facilities could also be required for SEIS Alternatives 5 and 6 and other population growth in the City. However, sufficient information was not provided on these possible facilities to estimate costs. See below under *Sub-section 3-5.2.3, Impacts to Police Service*, for details.

**Schools.** The DSEIS indicted that portables or expansion of the existing school facilities could be required for SEIS Alternatives 5 and 6 and other growth in the School District. At the time the DSEIS was prepared, the District was in the process of updating their Capital Facilities

Plan. The District was contacted for this FSEIS and indicated that they are still in the process of updating their Capital Facilities Plan. Therefore, details on possible new or expanded facilities and their costs are not available at this time. Mitigation for the impacts of the Trendwest (now New Suncadia) projects (including what is now Suncadia and 47° North) on schools are addressed in a December 2001 letter from Trendwest to the School District, and in a School District Mitigation Agreement executed in January 2003 between Trendwest and the School District. A similar Mitigation Agreement could be included in a new or updated Development Agreement for 47° North.

**Water.** The DSEIS and this FSEIS identify water system improvements that would be required with SEIS Alternatives 5 and 6 and other growth in the service area at project buildout in 2037. A list of these improvements and preliminary estimates of their costs is presented below:

- 4<sup>th</sup> filter train in the water treatment facility = \$2.6 million
- Zone 3 finished water pump = \$200,000
- Zone 3 reservoir (2 million gallons @ \$2.50/gallon) = \$5 million

**Solid Waste.** The DSEIS indicated that expansion of the Cle Elum Transfer Station could be required for SEIS Alternatives 5 and 6 and other growth in the service area. As indicated in FSEIS Section 3-4, **Utilities**, based on research conducted for this FSEIS, it is now established that Trendwest/New Suncadia has been making payments for improvements to the Kittitas County Solid Waste system to offset impacts from Suncadia as well as the UGA (including the 47° North development). Other research for this FSEIS determined that Kittitas County Solid Waste is in the process of updating their Solid Waste Management Plan. The draft Plan does not contain any details on possible expansion of the Cle Elum Transfer Station or construction of a new transfer station, and any associated costs.

**Transportation.** The DSEIS and this FSEIS identify intersections where transportation improvements would be required with SEIS Alternatives 5 and 6 for the various study years. A list of possible improvements at each intersection is provided (see Table 10 in FSEIS **Chapter 1** and in **Appendix A**). Preliminary rough order of magnitude cost estimate ranges for the potential transportation improvements are presented below:

- Compact (single-lane) Roundabout = \$300,000 - \$800,000
- Full (single-lane) Roundabout = \$1,000,000 - \$3,000,000
- Traffic Signal = \$500,000 - \$1,000,000
- Turn Lane Widening = \$50,000 - \$200,000
- Turn Restrictions = \$25,000 - \$100,000

**Fire Protection, Emergency Dispatch, Hospitals, & Sewer Services.** No new improvements/facilities were identified in the DSEIS or this FSEIS with SEIS Alternatives 5 and 6 for these services and utilities.

### **3-5.2.3 Impacts to Police Service**

#### **Comments Received**

L-4 (1-5, 7, 8) L-99 (6) (repeated in L-94 [1])

The City of Cle Elum Police Department commented that the public services analysis in the DSEIS should have relied on the Department's estimates of demand for police officers and vehicles based on a formula developed by the ICMA. The Police Department noted that the Department is currently understaffed, which should figure into the method used to assess the impacts of the SEIS Alternatives. The Police Department also indicated that there would be a need for additional police department office/records staff and space due to the project.

One commenter suggested that information on other jurisdictions where the Applicant's RV resorts are located should have been included in the DSEIS instead of the information on police calls to the Ellensburg KOA resort.

#### **Response to Comments/Updated Information & Analysis**

##### ***Methodology Used for Police Services Analysis***

It is acknowledged that the additional population under the SEIS Alternatives would generate a need for additional police staff, including police officers and potentially office/records staff. As indicated in DSEIS Section 3.12, Public Services, the City's Comprehensive Plan does not contain a quantitative Level of Service (LOS) standard for police service or police facilities. For the DSEIS analysis, the need for police officers was assumed to increase in direct proportion to population increases under the SEIS Alternatives. Population-based standards for these services are often adopted by local jurisdictions across the country to guide levels of service. Where LOS standards have not been adopted, environmental documents commonly use a *de facto* population-based standard to estimate and analyze incremental public service impacts. This approach is a common, generally accepted, and reasonable tool.<sup>4</sup> DSEIS Section 3.12, Public Services, also included the Cle Elum Police Department's calculation of police officer demand using the ICMA method, which resulted in more officers than the officer/population method. It is acknowledged, however, that the DSEIS fiscal analysis (DSEIS Appendix K, and summarized in Section 3.15, Fiscal & Economic Conditions, was based on the officer/population method to calculate police service demand. In response to the Police Department's comments, and for comparison purposes, the FSEIS includes an updated fiscal analysis that uses the ICMA method to estimate police service demand; it also updates police equipment, training, and vehicle costs. The updated fiscal analysis shows that the ICMA method results in greater

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<sup>4</sup> A review of documents identified through the Washington State SEPA register over the last five years determined that none of the EISs for mixed-used projects like 47° North used the ICMA model to calculate impacts on police service. Most used the officer/population or a similar method. The ICMA model was mentioned in two of the documents, however.

costs than the officer/population method (see FSEIS Section 3-7, **Fiscal & Economic Conditions**, and FSEIS **Appendix E** for details).

It should be noted that the ICMA calculation may also identify future need in a manner that compensates for some amount of present “understaffing”, i.e., the difference between current staffing levels expressed using population as a de facto multiplier, and what the current police staffing level would be if the ICMA formula was used. To the extent that the formula does include such a compensation, which cannot be determined, it could overestimate the demand caused by and attributable to the proposal.

It is also acknowledged that incremental additions to the Police Department’s staff, whether from general population growth or an unanticipated project proposal, may at some point trigger a need for expansion or new construction of departmental facilities, including the police station. Cities typically document the need and possible sources of funding for capital improvements, including city buildings, in their Comprehensive Plans and Capital Facilities Plans. The City of Cle Elum’s Comprehensive Plan, Capital Facilities element, updated in 2019, does not identify a need, a plan, or a program to expand or rebuild or to finance construction of a new police station. The Bullfrog Flats Master Site Plan was approved in 2002, and its associated population and public service demands were identified at that time and are assumed to have been considered in ongoing City comprehensive planning. As identified in the DSEIS, the public service demands of the 47° North proposal (SEIS Alternative 6) would be less than those for the approved Bullfrog Flats Master Site Plan (SEIS Alternative 5). While the growth and service demand represented by 47° North may contribute to an eventual need to expand the existing police station, the extent of any impact and proportional responsibility of 47° North cannot be determined at this time using available information. The City would first need to identify its long-term space needs, facility design and construction options, and cost and funding options before an individual project’s proportional responsibility can be determined. As indicated above, the SEPA Rules do not require that methods of financing public services and capital infrastructure be included in an SEIS; please refer to WAC 197-11-448.

### *RV Resort Impacts on Police Service*

Additional analysis of calls received by several police departments was conducted for this FSEIS to identify the numbers and types of calls generated by RV resorts similar to that proposed under SEIS Alternative 6. The selected resorts are similar in size and type of facilities, are located in the western U.S. (i.e., the Rockies and westward), and are owned and operated by the Applicant (Sun Communities). **Table 3-3** lists the resorts, their locations and characteristics, and the police departments that serve them. Available information on police calls to these resorts from 2015 through 2019 is shown.

Based on the average number of calls per year at the resorts, and scaling those calls in proportion to the SEIS Alternative 6 RV resort (i.e., based on the 627 RV sites under SEIS Alternative 6), the RV component of 47° North could potentially generate between 83 and 163 annual calls for police service.<sup>5</sup> Because of differences in methodology used in the DSEIS (i.e., a population-based standard), this call frequency cannot be converted to an equivalent demand for police officers. However, the possible annual calls from the 47° North RV resort can be compared to the total annual calls for service from the Cle Elum-Roslyn Police Department. The Police Department responded to 4,289 calls for service in 2019. Therefore, the calls from the 47° North RV resort could represent between 2% to 4% of the annual calls from the Police Department. The types of police service calls to the other Sun Community RV resorts varied by location. They mostly related to: noise, theft, animal control, medical-related, and alarms/public assistance. The amounts and types of police service calls to the RV resort in 47° North could be similar to those received from other Sun Community resorts.

**Table 3-3**  
**POLICE DEPARTMENT CALLS TO SUN COMMUNITIES RESORTS: 2015 – 2019**

Resort	Location	No. of Sites/Units	Police Dept.	2015 Calls	2016 Calls	2017 Calls	2018 Calls	2019 Calls	2020 Calls	Ave Calls/Yr.
Cava Robles	Paso Robles, CA	332 RV	City of Paso Robles	NR	NR	NR	19	42	46	44.0
49er Village	Plymouth, CA	325 RV	Amador County	51	52	39	58	58	NR	51.2
Crown Villa	Bend, OR	123 RV	City of Bend	44	42	23	18	33	NR	32.0

**Source: Sun Communities, 2021, City of Paso Robles Police Dept., 2021, Amador Co. Police Dept., 2021, City of Granby Police Dept., 2021, City of Bend Police Dept. 2021.**

RV = Recreational Vehicle

MH = Manufactured Housing

NR = Not Reported

### **3-5.2.4 Fire Prevention**

#### **Comments Received**

L-94 (4)

One comment asked for information on proposed fire protection measures with the proposed project, including firewising and prohibiting woodburning devices.

#### **Response to Comments/Updated Information & Analysis**

As described in DSEIS and FSEIS **Chapter 2**, a Land Stewardship Plan (LSP) like that used by Suncadia would be adopted and implemented with the SEIS Alternatives to ensure the long-term health of the designated open space areas. The LSP would include provisions for

<sup>5</sup> Assuming a low of 32 calls for the 123 RV sites in the Cava Robles resort and a high of 44 calls for the 332 RV sites in the Crown Villa resort, the calls were scaled for the 627 RV sites in 47° North.

“firewising” (e.g., thinning small trees, cutting limbs, raking debris and other fuel-reduction techniques). **Chapter 2** indicates that traditional wood campfires using wood for fuel would be prohibited in the RV resort, but individual and common area propane campfires would be permitted. These provisions would help to reduce potential wildfire dangers.

## **3-6. Plants, Animals, & Wetlands**

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### **3-6.1 2020 DSEIS**

DSEIS Section 3.3, Plants, Animals, & Wetlands, and Appendix E discussed existing plants/animals/wetland conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on plants/animals/wetlands, and identified mitigation measures to address impacts.

The DSEIS concluded that under both SEIS Alternative 5 – Approved Bullfrog Flats Master Site Plan and SEIS Alternative 6 - Proposed 47° North Master Site Plan Amendment, large portions of the site, and the plant, animal, and wetland habitat they provide, would be preserved in natural open space. Clearing of vegetation would be required in proposed development areas. The reduction of vegetation would fragment, alter, and remove wildlife habitat, which would cause a decrease in wildlife diversity and abundance. There would be no direct impacts to wetland and riparian habitat under SEIS Alternative 6; impacts to the newly identified Wetland 6 would occur under SEIS Alternative 5. Construction activities could release sediment and pollutants to on-site wetland and riparian habitat. Temporary erosion and sedimentation management measures would be implemented to address these possible impacts. Development of the site is not likely to result in significant adverse impacts on federally-listed plant or animal species; minor impacts on priority species, such as elk, could occur.

Operational impacts on wildlife would principally be related to increased disturbance from human activity. There would be fewer permanent residents and their associated activity under SEIS Alternative 6 than under SEIS Alternative 5; however, there would be RV resort visitors under SEIS Alternative 6. There would be a potential for water quantity and quality impacts from stormwater runoff on wetland and riparian habitat during operation of the project. A permanent stormwater management system would be installed onsite to address these potential impacts, and no significant stormwater impacts are expected.

### **3-6.2 2021 FSEIS**

Additional information and analysis are provided in this FSEIS to respond to certain of the comments on plants, animals, and wetlands. This information/analysis is summarized in the responses below; the full analysis is contained in FSEIS **Appendix D**, Updated Plants, Animals, & Wetlands Memo.

#### **3-6.2.1 Comprehensive Wildlife Survey**

##### **Comments Received**

L-2 (1, 6), L-60 (1), L-54 (3), L-70 (1)

Comments were received from Washington State Department of Fish and Wildlife (WDFW) and others requesting that a comprehensive wildlife survey be conducted throughout the seasons at the 47° site.

### Response to Comments/Updated Information & Analysis

Wildlife investigations were completed at the 47° North site on October 22, 2019 for this SEIS. These investigations were used to determine if any significant changes in wildlife had occurred since planning for the site began in the late 1990s, and to supplement the already extensive investigations completed at the site and in the vicinity.

Initial wildlife studies were conducted for the MountainStar EIS in 1999 and information gathered for the Cle Elum UGA EIS in 2002. These surveys involved hundreds of staff field hours by the SEIS biological resources consultant to complete breeding bird surveys, mammal studies, elk land-use studies, reptile and amphibian inventory transects, and general habitat characterizations and wildlife notes. The studies took place during every season of the year and were comprehensive in their coverage of the 47° North site.

In addition, from 2007 to 2008 and 2014 to 2017, a total of 290 field hours were spent by the SEIS biological resources consultant to complete habitat and wildlife investigations in the area, including on the adjacent Suncadia property and portions of the 47° North site. Beyond documenting wildlife use and habitat characteristics, these investigations included assessments for invasive pests and plants, firewising notes, and forest community characteristics such as plant species composition and general vigor and health.

In 1999, there was direct observation or documented sign of 12 mammal species, 90 bird species, and 7 species of reptiles and amphibians on the Suncadia and 47° North sites and vicinity. The 2019 field investigation for the 47° North SEIS was consistent with findings from past studies with respect to those species likely to be present during the fall. Current forest habitat conditions are similar to those documented from past investigations. Forest regeneration continues in the early successional mixed conifer forest in the west-central portion of the site, with young trees growing taller and filling in more of the area. Some additional forest thinning has occurred in the forest areas along either side of Wood Duck Road in the western part of the site near the river.

Based on the extensive studies of the site and vicinity for the 1999 MountainStar EIS, information gathered for the 2002 Cle Elum UGA EIS, and experience and observations on the site and vicinity since then, it was determined that sufficient, comprehensive information on the wildlife use and habitat conditions on the site has been collected over time to enable adequate evaluation of the impacts of the 47° North proposal and alternatives. Therefore, no additional wildlife surveys have been conducted or are considered necessary for this FSEIS (see FSEIS **Appendix D** for details).

### **3-6.2.2 Regulated Species & Species/Habitats of Greatest Conservation Need**

#### **Comments Received**

L-2 (2, 6), L-45 (3), L-54 (1, 3, 4, 5)

WDFW and others commented on the impacts of the SEIS Alternatives to federal and state-listed wildlife species and habitats. WDFW requested discussion of applicable Species/Habitats of Greatest Conservation Need. Other comments asserted that the DSEIS did not include adequate description of elk and northern spotted owl habitat.

#### **Response to Comments/Updated Information & Analysis**

The DSEIS provided information on all WDFW Priority Habitats and Species (PHS) (updated in 2008) that could occur at the site based on the WDFW (2019) online PHS mapping tool. The DSEIS also discussed all federally listed species from the USFWS Information for Planning and Consultation (IPaC) list (2019). Potential occurrence was indicated and probable impacts of development on these species was discussed. The species include: gray wolf, northern spotted owl, wolverine, grizzly bear, Canada lynx, elk, Columbia spotted frog, sharp-tailed snake, bald eagle, and pileated woodpecker (see DSEIS Section 3.3, Plants, Animals, & Wetlands, and Appendix E for details).

#### ***Washington State Wildlife Action Plan (SWAP)***

In response to WDFW's comment, the conservation concerns about cinnamon teal (*Anas cyanoptera*) and band-tailed pigeon (*Patagioenas fasciata*) in the Washington State Wildlife Action Plan (SWAP) (2015) are discussed in this FSEIS. The SWAP is a comprehensive plan for conserving the state's fish and wildlife and the natural habitats on which they depend, with particular focus on Species of Greatest Conservation Need (SGCN). **Table 3-4** summarizes the regulatory status of these two species, conservation concerns, their habitat preference, and potential for impacts with SEIS Alternatives 5 and 6 (see FSEIS **Appendix D** for details).

#### ***Species/Habitats of Greatest Conservation Need***

The site appears to be located within the Northern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest Type of the Species of Greatest Conservation Need (SGCN)/Habitats of Greatest Conservation Need lists. The SGCN list indicates species closely associated with this habitat type. **Table 3-4** summarizes the regulatory status of these species, their habitat preference, and potential for impacts with SEIS Alternatives 5 and 6 (see FSEIS **Appendix D** for details).

**Table 3-4  
SPECIES OF GREATEST CONSERVATION NEED**

Scientific Name	Common Name	Federal Status	Washington State Status	Habitat Preference / Presence Onsite	Impacts w/ SEIS Alternatives 5 & 6
<b>Washington State Wildlife Action Plan</b>					
<i>Anas cyanoptera</i>	Cinnamon Teal	None	None (conservation concern)	Dense upland vegetation located near freshwater ponds and lakes with emergent vegetation/present onsite	Minimal because no development would occur in the Cle Elum River corridor.
<i>Patagioenas fasciata</i>	Band-tailed Pigeon	None	None; WDFW PHS list Species of Recreational, Commercial, and/or Tribal Importance	Closed canopy forests west of the Cascade crest, with part of life spent in mineral springs and tidelands/not expected onsite	Removal of some forest habitat; however, impacts on species not expected because unlikely to occur onsite.
<b>Northern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest Type</b>					
<i>Sitta pygmaea</i>	Pygmy Nuthatch	None	Species of Concern	Old Ponderosa pine forests/present onsite	Removal of some forest habitat; however, portions of habitat retained.
<i>Picoides albolarvatus</i>	White-headed woodpecker	None	Candidate Species; Priority Areas	Open canopy, mature and old-growth Ponderosa pine forest/present onsite	Removal of some forest habitat; however, portions of habitat retained.
<i>Oreortyx pictus</i>	Mountain Quail	None	None; WDFW PHS list Species of Recreational, Commercial, and/or Tribal Importance	Dense shrub communities in riparian zones/may be present onsite, but not confirmed	Minimal because no development would occur in the Cle Elum River corridor.
<i>Strix nebulosa</i>	Great Gray Owls	None	Species of Greatest Conservation Need	Conifer forests at 2,500 and 7,500 ft. elevation adjacent to montane meadows/not expected onsite	None.
<i>Aquila chrysaetos</i>	Golden Eagles	None	None	Open plateaued areas with many cliffs; mature or old growth conifers near clearcuts/not expected onsite	None.
<i>Otus flammeolus</i>	Flammulated Owl	None	Candidate Species; Priority Areas	Ponderosa pine and grand fir/Douglas-fir forests with relatively open canopies and	Reduction of potential foraging habitat but unlikely to impact any breeding pairs.

Scientific Name	Common Name	Federal Status	Washington State Status	Habitat Preference / Presence Onsite	Impacts w/ SEIS Alternatives 5 & 6
				understories/limited onsite	
<i>Lynx canadensis</i>	Canada lynx	Threatened	Endangered	Moist boreal forests/not expected onsite	None.
<i>Sciurus griseus</i>	Western gray squirrels	None	Threatened	Transitional areas of conifer forest with open patches of oaks and other deciduous trees/not expected onsite	None.
<i>Lampropeltis zonata</i>	California mountain kingsnake	None	Candidate Species	Columbia River Gorge area/not expected onsite	None
<i>Contia tenuis</i>	Sharp-tailed snake	None	Candidate Species	Riparian zones, as well as edges between forested communities and open meadow communities/may be present onsite, but not confirmed	Minimal because most suitable habitats (riparian and wetland areas) preserved; development around the smaller, isolated wetlands could impact dispersal and connectivity.

Source: Raedeke Associates, 2021.

A habitat of Greatest Conservation Need, the Columbia basin foothill riparian woodland and shrubland habitat type is associated with the lower Cle Elum River corridor areas of the 47° North site. This habitat is characterized by an association with black cottonwood (*Populus balsamifera*), as well as white alder (*Alnus rhombifolia*), quaking aspen (*Populus tremuloides*), water birch (*Betula occidentalis*), and ponderosa pine (*Pinus ponderosa*). The most imminent threats to this habitat type include: overharvesting, climate change, agriculture and aquaculture side effects, dams and diversions, invasive species, and roads and development. SEIS Alternative 5 and 6 would retain the Cle Elum River and associated riparian and wetland areas in a designated natural open space area, thus avoiding impacts to this habitat.

## Elk

One commenter noted that he has observed elk calving in the west-central portion of the 47° North site (where the RV resort is proposed under SEIS Alternative 6). While some elk may use the site all year, and this may include calving, based on previous studies (see the response to comments in *Sub-section 3-6.2.1, Comprehensive Wildlife Survey*, above) and available sources, most of the elk in this area migrate to higher elevation areas to the north and west of the site for the spring and summer. Previous studies and recent observations indicate that elk use of the site appears to be concentrated along the Cle Elum River corridor and associated habitats, although signs of use were observed in the upland forested areas of the site as well (including bedding areas). As discussed in the DSEIS,

development under the SEIS Alternatives could reduce some of the available habitat (particularly winter habitat) for elk, which could reduce the local population. However, many high-quality areas, such as the Cle Elum River corridor and adjacent forest habitat, would be retained (see DSEIS Section 3.3, Plants, Animals, & Wetlands, and Appendix E).

### *Spotted Owl*

As described in the DSEIS, the closest known spotted owl site center is located approximately two miles to the north of the site and has not been occupied in many years. Although the Fc-f habitat type located in the south-central portion of the site does have closed canopy and is dominated by Douglas-fir, it does not meet other habitat characteristics of spotted owl habitat such as tree age/height, tree density, shrub cover, snag density, canopy lift, and forest layers from the Washington Forest Practices Board (2003) definitions of spotted owl habitat for eastern Washington. Further, it is not expected that spotted owls would disperse across the more urbanized areas located adjacent to the site. For these reasons, spotted owls are not expected use the site, including the Fc-f habitat (see DSEIS Section 3.3, Plants, Animals, & Wetlands, and Appendix E).

### **3-6.2.3 Wildlife Movement**

#### **Comments Received**

L-2 (3, 6)

Comments from WDFW questioned whether adequate provisions for wildlife movement through the site have been made under SEIS Alternatives 5 and 6 and requested information on habitat concentration and connectivity areas.

#### **Response to Comments/Updated Information & Analysis**

##### *Habitat Concentration & Connectivity Areas*

Reports prepared by the Washington Wildlife Habitat Connectivity Working Group (WHCWG) identify several Habitat Concentration Areas (HCAs) and Least-Cost Pathways in both the Statewide Analysis and the Columbia Plateau Ecoregion documents). A habitat concentration area is defined as “significant habitat areas that are expected or known to be important for focal species based on actual survey information or habitat association modeling.” A least-cost pathway is described as a “continuous swath of land expected to encompass the best route for species to travel between habitat blocks.” These are both identified by the WHCWG as important to conserve to ensure species retain mobility and connectivity between patches of habitat to best ensure overall species population health and genetic diversity.

HCAs for western toad and beaver are indicated on and in the vicinity of the 47° North site. The western toad habitat concentration area onsite is located within the areas adjacent to

the Cle Elum River corridor. The HCAs for beaver include the Cle Elum River corridor, as well as portions of the plateau spanning across the central portion of the site. A least-cost pathway between two off-site black-tailed/mule deer HCAs is indicated as generally extending southwesterly through the central plateau portion of the site.

Open space areas that would be preserved under SEIS Alternatives 5 and 6 would continue to function to provide some connectivity for these species, particularly beaver and western toad, who would primarily be located along the Cle Elum River corridor. Development of the site could alter portions of the black-tailed/mule deer connectivity pathway, but open space areas through the powerline corridors and through the forested areas in and adjacent to the Horse Park, as well as the forests along the river corridor, would continue to provide avenues of movement through the area (see *Sub-section 3-6.2.4, Loss of Habitat & Wildlife/Human Interactions*, below for details).

The Washington SWAP spatial data indicates many patches of imperiled habitats in the southwestern portion of the site. These habitats areas depicted as imperiled to critically imperiled are contained within the Cle Elum River corridor area onsite. All these imperiled habitat areas found onsite would be retained within a large buffer under SEIS Alternatives 5 and 6.

(See FSEIS **Appendix D** for details.)

### **3-6.2.4 Loss of Habitat & Wildlife / Human Interactions**

#### **Comments Received**

L-2 (4, 6), L-45 (3), L-58 (2), L-60 (1), L-63 (5), L-70 (1)

WDFW and others expressed concern about the increased potential for wildlife/human interactions with proposed development and how this would be addressed.

#### **Response to Comments/Updated Information & Analysis**

##### ***Habitat Removal & Fragmentation***

As discussed in the DSEIS, development under the SEIS Alternatives, consistent with the site's urban land use and zoning designations and approved Master Site Plan, would reduce and fragment the wildlife habitat at the site. However, SEIS Alternative 6 would retain approximately 477 acres of open space (58% of the site), all of which, except the powerline corridors, would remain as undeveloped forest. Areas within the Cle Elum River corridor, including Wetlands 1, 2, and 3, would be retained as undeveloped open space. The river corridor would remain contiguous with other off-site open space, including in the Horse Park and Suncadia resort. In addition, other natural open space areas are proposed between the development areas that would be contiguous with off-site open space and

would continue to provide connectivity (see DSEIS Section 3.3, Plants, Animals, & Wetlands, Appendix E for details).

The DSEIS also discussed cumulative impacts to habitat and fragmentation. In addition to the proposed development at the 47° North site, development in adjacent areas (such as the Suncadia resort) and other nearby areas (such as in Cle Elum and Roslyn) that were once characterized by natural habitat have become more fragmented and developed in recent years. These changes have led to an overall reduction in habitat quantity and quality. However, a significant portion of the Suncadia resort is preserved as natural and managed open space, and much of the surrounding forest lands remains. Development of the 47° North site would contribute to the land use and habitat composition changes in the area, although much of the highest quality habitat onsite would be retained in open space areas (see DSEIS Section 3.3, Plants, Animals, & Wetlands, and Appendix E for details).

### *Wildlife/Human Interactions*

As discussed in the DSEIS, proposed development under SEIS Alternative 5 and 6, as well as other approved development in the area, would increase the potential for human/wildlife conflict (see DSEIS Section 3.3, Plants, Animals, & Wetlands, and Appendix E).

Continued development in the area would increase the potential for conflicts with elk. Based on past and recent studies, elk primarily use the western portion of the site near the Cle Elum River corridor, and occasionally use the upland forest areas. Elk have been documented using various portions of the Suncadia resort, including golf courses. It is possible that because of recent adjacent development, elk populations are more regularly present throughout the site. It is also possible that development of the site could lead to increased use by elk in adjacent areas. Preferred elk habitat (e.g., the river corridor and associated habitats) would be preserved under SEIS Alternatives 5 and 6 which would limit the potential for conflicts with humans.

New possible mitigation measures are identified in this FSEIS to help minimize human/wildlife conflicts. These measures include provisions such as the use of 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. In addition, 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. These measures have been added as “Other Possible Mitigation Measures” in this FSEIS (see **Chapter 1**).

### **3-6.2.5 Land Stewardship Plan**

#### **Comments Received**

L-2 (5, 6)

Comments from WDFW asked whether a Land Stewardship Plan (LSP) has been developed for 47° North and what it includes.

#### Response to Comments/Updated Information & Analysis

As discussed in the 2002 Cle Elum UGA EIS and in the 47° North DSEIS (DSEIS Section 3.3, Plants, Animals, & Wetlands, and Appendix E), the current LSP for the Suncadia properties includes conservation easements for natural and managed open space within the entire Cle Elum River corridor, including on the 47° North site. Implementation of the LSP at the site would help to ensure retained open space areas are managed to properly serve wildlife habitat needs. Management of open space lands under the LSP would also help to ensure that these natural areas are maintained to maximize forest health as well as safe conditions in terms of fire risk and invasive pests. Another possible mitigation measure that is identified in the DSEIS and this FSEIS includes incorporation of other designated natural or managed open space corridors onsite (in addition to the river corridor) into the current LSP to promote healthy and firewise forests and quality wildlife habitat (see FSEIS **Chapter 1**).

## **3-7. FISCAL & ECONOMIC CONDITIONS**

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### **3-7.1 2020 DSEIS**

DSEIS Section 3.15, Fiscal & Economic Conditions, and Appendix K discussed existing fiscal and economic conditions in the site vicinity, analyzed the impacts of the SEIS Alternatives on fiscal and economic conditions, and identified mitigation measures to address impacts.

The DSEIS concluded that development of SEIS Alternatives 5 and 6 would create demand for temporary jobs during construction, followed by permanent jobs and services during operation. SEIS Alternative 5 would generate more temporary and permanent jobs than SEIS Alternative 6 due to the greater amount of development and greater use of local construction contractors. The temporary and permanent jobs under the SEIS Alternatives are expected to result in positive impacts to the local economy. Both SEIS Alternatives would increase the tax base and increase the demand for services in each of the taxing jurisdictions evaluated. At buildout, both SEIS Alternatives would generate fiscal surpluses to the City of Cle Elum.

### **3-7.2 2021 FSEIS**

Additional information and analysis are provided in this FSEIS to respond to the key comments on fiscal and economic conditions. This information/analysis is summarized in the responses below; the full analysis is contained in FSEIS **Appendix E**, Updated Fiscal Conditions Memo.

#### **3-7.2.1 City of Cle Elum Police Department Costs**

##### **Comments Received**

L-4 (1-8)

Comments were received from the City of Cle Elum Police Department on the costs to provide police service with development of the SEIS Alternatives. Comments questioned what the costs to the City would be if the demand for police service under the SEIS Alternatives (e.g., staff, equipment, facilities) were calculated using the Police Department's preferred International City/County Management Association (ICMA) Center for Public Safety Management (CPSM) "Rule of 60" model.

##### **Response to Comments/Updated Information & Analysis**

As indicated in the DSEIS, neither the Cle Elum Comprehensive Plan nor the Cle Elum Police Department have adopted quantitative Level of Service (LOS) standards for police service. For the DSEIS analysis, the staffing needs for police were assumed to increase in direct proportion to population increases under the SEIS Alternatives; this is a commonly used method to analyze public services impacts in EISs (see FSEIS Section 3-5, **Public Services**, for details). The DSEIS also included the Cle Elum Police Department's calculation of staffing

demand using the ICMA method. The DSEIS fiscal analysis used information on police service demand based only on the officer/population method (see DSEIS Section 3.15, Fiscal & Economic Conditions, and Appendix K).

An updated fiscal analysis is included in this FSEIS to compare the City's police staffing costs using the full-time equivalents (FTE) officer estimates based on the DSEIS officer/population method to the FTE based on the Police Department's/ICMA model. The updated analysis also incorporates updated police officer salary information from the City, and an annual amortized payment for equipment, training, and vehicles (see FSEIS **Appendix E**).

**Police Staffing.** The FTE assumptions for the SEIS Alternatives are described below. As shown, the ICMA staffing model would result in approximately double the FTE staff of the officer/population method used in the DSEIS under both SEIS Alternative 5 and 6 at buildout (assumed to be 2051 for SEIS Alternative 5; and 2028 for the residential and RV components for SEIS Alternative 6). Note that the ICMA information used in the analysis is based on calculations provided by the Police Department and was not replicated, proofed, or modified by the SEPA consultant.

- **FTE using Officer/Population Method (DSEIS Analysis):**
  - SEIS Alternative 5: 6.7 FTE total (1 FTE per year from 2021 to 2023, 0.9 FTE added in 2024, 0.9 FTE added in 2029, 0.8 FTE added in 2036, and 1.1 FTE added in 2045)
  - SEIS Alternative 6: 5.5 FTE total (1 FTE added in 2021 and 2022, 1.5 FTE added in 2023, 1.0 FTE added in 2024, and 1.0 FTE added in 2029)
- **FTE using City of Cle Elum Police Department's Calculation (ICMA Model):**
  - SEIS Alternative 5: 12 FTE total (4 FTE added in 2021, 4 FTE added in 2032, and 4 FTE added in 2044)
  - SEIS Alternative 6: 8 FTE total (4 FTE added in 2021, and 4 FTE added in 2030)

The staffing costs (i.e., an average cost to reflect salary and benefits per FTE) were updated for the FSEIS analysis. The yearly salary assumption in the DSEIS was \$86,000 – which represented the police mean wage across Washington State per the Bureau of Land Services, plus benefits. The updated assumption in this FSEIS is \$97,016 – which reflects a per FTE salary based on the City's Salary and Wage Plan (Ordinance No. 1595) and benefits determined using a benefits multiplier from the Bureau of Labor Statistics. In summary, costs to the City for police service would increase throughout buildout using either staffing method; however, there would be a greater increase in costs using the ICMA method.

**Police Equipment, Training, & Vehicles.** In the updated fiscal analysis prepared for this FSEIS, the lump sum \$25,000 per FTE assumption for police equipment, training, and vehicles in the DSEIS was adjusted to a \$15,000 per FTE *per year* assumption to reflect an annual amortized payment for equipment/training/vehicles. The current assumption is derived from previous research by the SEIS fiscal analysis consultant (unpublished) and grounded in comparable contract police service costs charged to contract cities. For

example, the 2020 cost of equipment, vehicle, training, cell phone, radio, and other purchased services for the King County Sheriff's Office contracts with cities is approximately \$25,000 per deputy per year or about 15% of compensation (wages and benefits). The 15% estimate is used to derive a reasonable estimate of similar costs in the Cle Elum staffing equating to \$15,000 per FTE per year (see FSEIS **Appendix E** for details).

**Police Facilities.** As described in FSEIS Section 3-5, **Public Services**, while the growth and service demand represented by 47° North may contribute to an eventual need to expand the existing police station or build a new station, the extent of any impacts and mitigation responsibility of 47° North cannot be determined at this time using available information. Therefore, the costs of an expanded/new facility have not been calculated for this FSEIS.

### **3-7.2.2 Cost/Revenues to the City of Cle Elum & Other Service Providers**

#### **Comments Received**

L-41 (1), L-99 (3) (repeated in L-94 [1])

A couple of comments voiced general concerns about whether the costs to provide public services and infrastructure to the SEIS Alternatives would exceed revenues to the City of Cle Elum and other service purveyors.

#### **Response to Comments/Updated Information & Analysis**

The DSEIS included an analysis of the costs and revenues to the City of Cle Elum from SEIS Alternatives 5 and 6 (see DSEIS Section 3.13, Fiscal & Economic Conditions, and Appendix K for details). The analysis of costs and revenues to the City was updated for this FSEIS. As described above under *Sub-section 3-7.2.1, City of Cle Elum Police Department Costs*, the FSEIS analysis includes updated police staffing and police equipment/vehicle/training costs. The FSEIS analysis continues to use the officer/population method to generate the number of FTE police officers required for SEIS Alternatives 5 and 6. It was not possible to assess the comparable net fiscal impacts using the ICMA method of estimating needed FTE police officers because documentation of the basis for the estimates was not provided. Specifically, it was not clear: 1) what level, timing, and mix of development was assumed using the ICMA approach, and 2) what distinction was being made for future service needs within the study area and the city as whole.

As shown in **Table 3-5**, the updated fiscal analysis concludes that SEIS Alternative 5, SEIS Alternative 6, the residential and RV resort component of SEIS Alternative 6 only (47° North), and the possible commercial component of SEIS Alternative 6 only would generate fiscal surpluses for the City at buildout.<sup>6</sup> Looking at 47° North separately from the possible commercial component of SEIS Alternative 6, the analysis concludes that 47° North could generate a fiscal shortfall post-buildout and the possible commercial development could generate a small fiscal shortfall in earlier years. The fiscal shortfall for 47° North in 2037

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<sup>6</sup> Buildout is assumed to be 2051 for SEIS Alternative 5 and 2037 for SEIS Alternative 6. Buildout is assumed to be 2028 for SEIS Alternative 6 residential and recreational development and 2037 for the SEIS Alternative possible commercial development.

would reflect a timing issue and would result from three factors: 1) the one-time nature of the sales tax coming off construction would have ended with the project reaching buildout, 2) the escalation (e.g., inflation adjusted growth) of on-going public service costs would begin to outpace on-going tax revenues, and 3) the allocation of FTE police officer costs in 47° North versus the possible commercial development relative to tax revenues. The shortfall for the possible future commercial development mostly reflects the timing of additional public safety costs before much of the buildout is achieved (see FSEIS **Appendix E** for details).

**Table 3-5**  
**CITY OF CLE ELUM CUMULATIVE REVENUE AND COST SUMMARY –**  
**SEIS ALTERNATIVES 5 & 6 (in \$1000s)**

	2025	2031	2037	2051
<b>SEIS Alternative 5 (Total)</b>				
Total Revenues	\$3,950	\$8,890	\$14,700	\$28,200
Property Taxes	\$1,580	\$4,930	\$8,980	\$18,920
Sales Tax on Construction	\$1,870	\$2,570	\$3,290	\$4,330
Ongoing Sales Tax	\$80	\$260	\$480	\$1,040
Utility Taxes	\$420	\$1,130	\$1,950	\$3,910
Total Costs	\$2,184	\$6,030	\$10,312	\$21,595
Police	\$1,565	\$4,452	\$7,719	\$16,525
Fire	\$261	\$778	\$1,357	\$2,845
Parks	\$26	\$79	\$138	\$289
Public Works	\$332	\$721	\$1,098	\$1,936
Net Fiscal Impact	\$1,766	\$2,860	\$4,388	\$6,605
<b>SEIS Alternative 6 (Total)</b>				
Total Revenues	\$2,986	\$7,336	\$11,626	--
Property Taxes	\$960	\$2,930	\$4,900	--
Sales Tax on Construction	\$1,176	\$1,416	\$1,486	--
Ongoing Sales Tax	\$200	\$1,210	\$2,370	--
Utility Taxes	\$640	\$1,750	\$2,820	--
Total Costs	\$2,237	\$6,333	\$10,670	--
Police	\$1,757	\$5,076	\$8,624	--
Fire	\$163	\$550	\$958	--
Parks	\$15	\$52	\$91	--
Public Works	\$302	\$655	\$997	--
Net Fiscal Impact	\$749	\$1,003	\$956	--

	2025	2031	2037	2051
<b>SEIS Alternative 6 (47°North Only)</b>				
Total Revenues	\$2,696	\$5,786	\$8,556	--
Property Taxes	\$920	\$2,690	\$4,310	--
Sales Tax on Construction	\$1,096	\$1,226	\$1,226	--
Ongoing Sales Tax	\$40	\$130	\$220	--
Utility Taxes	\$630	\$1,710	\$2,750	--
Total Costs	\$1,942	\$5,480	\$9,225	--
Police	\$1,502	\$4,338	\$7,371	--
Fire	\$139	\$470	\$818	--
Parks	\$15	\$52	\$91	--
Public Works	\$286	\$620	\$945	--
Net Fiscal Impact	\$754	\$306	(\$669)	--
<b>SEIS Alternative 6 (Possible Commercial Only)</b>				
Total Revenues	\$290	\$1,540	\$3,080	--
Property Taxes	\$40	\$240	\$580	--
Sales Tax on Construction	\$80	\$190	\$270	--
Ongoing Sales Tax	\$160	\$1,080	\$2,150	--
Utility Taxes	\$10	\$30	\$70	--
Total Costs	\$295	\$852	\$1,444	--
Police	\$255	\$738	\$1,253	--
Fire	\$24	\$80	\$139	--
Parks	\$0	\$0	\$0	--
Public Works	\$16	\$34	\$52	--
Net Fiscal Impact	(\$5)	\$688	\$1,636	--

**Source: ECONW, 2021.**

As described in the DSEIS, while other public service purveyor costs (e.g., hospital service, emergency dispatch, and schools) could exceed revenues to serve the SEIS Alternatives, mitigation may or may not be required, as the purveyors have several funding sources. The DSEIS and this FSEIS indicate that ongoing fiscal monitoring could be conducted to determine appropriate mitigation, and mitigation agreements with affected jurisdictions could be implemented as a condition of project approval and in a new or updated Development Agreement to address any specific and/or general fiscal impact concerns that may occur (see DSEIS Section 3.15, Fiscal & Economic Conditions, and Appendix K, and FSEIS **Chapter 1** for details).

### **3-7.2.3 Services & Infrastructure Funding**

#### **Comments Received**

L-41 (1), L-45 (2), L-47 (2), L-99 (2, 3, 12-14, 17, 19, 20, 21, 22) (repeated in L-94 [1])

Comments asserted that the costs/funding necessary to provide services and infrastructure for the 47° North project should be identified in the SEIS, particularly given the size of the project. Concern was also expressed about how the maintenance of public facilities, such as the municipal/community center, would be paid for. Finally, specific comments were made about the need for and related costs of new school facilities.

#### **Response to Comments/Updated Information & Analysis**

##### ***General Services & Infrastructure Funding***

The fiscal analysis in the DSEIS (see DSEIS Section 3.15, Fiscal & Economic Conditions, and Appendix K) and the updated fiscal analysis in this FSEIS (see FSEIS **Appendix E**) show that the development under SEIS Alternatives 5 and 6 would generate additional costs and revenues to the City of Cle Elum. The revenues can be used by the City to fund needed public services or help keep constituent tax burdens effectively lower than they might have been without the project (e.g., the expansion of the tax base with the project would provide additional revenue to the City that could keep current City constituent tax burdens effectively lower at the same level of public expenditure). Also see the response to *Sub-section 3-7.2.2, Cost/Revenues to the City of Cle Elum & Other Service Providers* above.

Public agencies in Washington plan for future growth, including the infrastructure needed to support this growth. Capital facility plans are prepared as part of this forward-looking planning, as required by the Washington State Growth Management Act (GMA). Capital planning for all ranges of local government typically prioritize capital projects since funding is limited. These plans also identify sources of funding that will help deliver the projects, including grants and other local funding sources such as taxes. Regarding the later, future residents and businesses of 47° North would become part of the tax base that would contribute to any local funding of infrastructure.

The 2019 City of Cle Elum Comprehensive Plan includes a Capital Facilities element, as required by the GMA. Infrastructure improvements and possible funding sources identified in this element are those required by the growth in the city, including the growth from 47° North. It should be recalled that 47° North would substitute for a Master Site Plan that was approved in 2002, and the SEIS indicates that the growth in population, and service and facility demand associated with the proposal would be less than for the 2002 Master Site Plan.

This FSEIS identifies the estimated cost of facilities – including water facilities and road improvement options – where affected facility plans are current and sufficiently advanced

to make such estimates realistic and possible. Some of this information will be developed or refined subsequent to the SEPA process, however. The SEPA Rules do not require that methods of financing public services and capital infrastructure be included in an SEIS; please refer to WAC 197-11-448. Project-specific responsibility for improvements will be discussed and assigned during review of a Master Site Plan application and Development Agreement. Specific financing methods will be considered in the context of ongoing City planning and budgeting processes.

As described in the responses in Section 3-2, **Transportation**, above, and in FSEIS **Appendix A**, additional analysis, engineering, design and inter-agency coordination and discussion is necessary before project-specific costs can be identified. In addition, a Master Site Plan application has not been submitted at this point, and the proposal submitted for review and decision could be modified based on the information in the SEIS. However, using Transportation as an example, the SEIS does provide general costs for a range of intersection improvements and a range of estimates of pro-rata share. Additional analysis is being conducted that will be used by WSDOT and the City to identify improvements for each intersection that requires mitigation. Costs will depend on the geometry, topography and other conditions of each intersection. Provisions for payment of proportional responsibility for services and infrastructure, and the timing of payment of any obligations, will be addressed as part of project approvals for 47° North, including a new or updated Development Agreement for the project. The required timing of improvements will also be determined in the context of GMA's "concurrency" requirements; please refer to RCW 36.70A.070(6)(b). Note that the public will have additional opportunities to review and comment on the modified Master Site Plan application and Development Agreement during the City's land use review process.

The analysis of new/alternative taxes and fees to pay for the maintenance of public facilities, such as the municipal/community center, is not related to impacts caused by the proposal and is not a subject for analysis in a SEPA EIS/SEIS (see WAC 197-11-448 (3)).

### *School Capacity, Costs, & Funding*

Regarding school service, a current Capital Facilities Plan was not available for the Cle Elum-Roslyn School District at the time the DSEIS was prepared; the Plan is still being updated and is not available. Information used in the DSEIS was provided directly by the School District. The DSEIS indicated that current and projected enrollment through 2025 is expected to be within the capacity of the Cle Elum Elementary School; however, enrollment could exceed the capacity of the Walter Strom Middle School and the Cle-Elum Roslyn High School in certain years. With the introduction of new students under the SEIS Alternatives, it is anticipated that some or all the schools could reach the capacity limits of the District's existing facilities. If this occurs over the course of the 47° North project, portable classroom buildings at the school sites or additions to existing buildings could be required (see DSEIS Section 3.12, Public Services, for details). Note that recent information provided by the Applicant indicates that approximately 35% of the single family residences in 47° North (184

units) could be secondary/vacation homes; this is possible but is not certain to occur. This type of use was not accounted for in the analysis of the project's impacts on schools in the DSEIS. Second homes would not likely generate any students because families would not reside in the homes year-round. Therefore, the analysis of the proposal's impacts on schools in the DSEIS could be considered conservative to the extent that it accounts for permanent population and student generation from all the single family residential units.

The DSEIS analyzed the costs to the Cle Elum-Roslyn School District of the additional staff required under the SEIS Alternatives. The analysis noted that school districts receive most of their funding through state property tax. Mitigation for the impacts of the Trendwest (now New Suncadia) projects (including what is now Suncadia and 47° North) on schools are addressed in a December 2001 letter from Trendwest to the School District, and in a School District Mitigation Agreement executed in January 2003 between Trendwest and the School District. In the 2001 letter, Trendwest agrees to reimburse the District for the costs of starting up and maintaining a system to account for student enrollment related to the Trendwest properties. In the 2003 Mitigation Agreement, it is stated that the agreement covers the period of revenue deficiencies from the Trendwest projects. The agreement lists the following measures to be provided by Trendwest:

- Conveyance of a site to the School District for school expansion (this conveyance has already occurred);
- Contribution to the costs of portables attributable to the projects; and
- Contribution to the costs of buses attributable to the projects.

Conditions similar to those included in the 2001 Trendwest letter, and 2003 School Mitigation Agreement could be included in a new or updated Development Agreement, and a new or updated school mitigation agreement for 47° North (see DSEIS Section 3.15, Fiscal and Economic Conditions, and Appendix K, and FSEIS **Chapter 1**).

## **3-8. AESTHETICS / LIGHT & GLARE**

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### **3-8.1 2020 DSEIS**

DSEIS Section 3.8, Aesthetics/Light & Glare, and Appendix H discussed existing aesthetic/light and glare conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on aesthetics/light and glare, and identified mitigation measures to address impacts.

The DSEIS concluded that proposed development under SEIS Alternatives 5 and 6 would change the visual character of the site from an undeveloped, predominately forested area to a mixed-use urban development. Large portions of the site would be preserved in open space, and forested buffers would be retained along the perimeter of the site, including along Bullfrog Road, which would largely block views of proposed development on the 47° North site from immediately surrounding areas. The greatest potential to see the development would be from higher elevation vantage points. The SEIS Alternatives would include new sources of light and glare such as street, building, and landscape lighting. Light and glare would also be generated by RVs in the RV resort under SEIS Alternative 6, and traffic under both SEIS Alternatives on area roadways. Development standards (e.g., Dark Sky) would be implemented to reduce light and glare impacts.

### **3-8.2 2021 FSEIS**

#### **3-8.2.1 Views**

##### **Comments Received**

L-13 (1), L-60 (7), L-99 (10, 11, 45, 46, 47) (repeated in L-94 [1])

The Applicant commented that existing vegetation and buffers should not be relied on to consistently screen views. Several comments that were raised expressed concerns about potential view impacts, particularly along Bullfrog Road, indicating that the 100-foot minimum buffer would not provide adequate screening. One comment remarked about the impacts on dark skies with the proposed development.

##### **Response to Comments/Updated Information & Analysis**

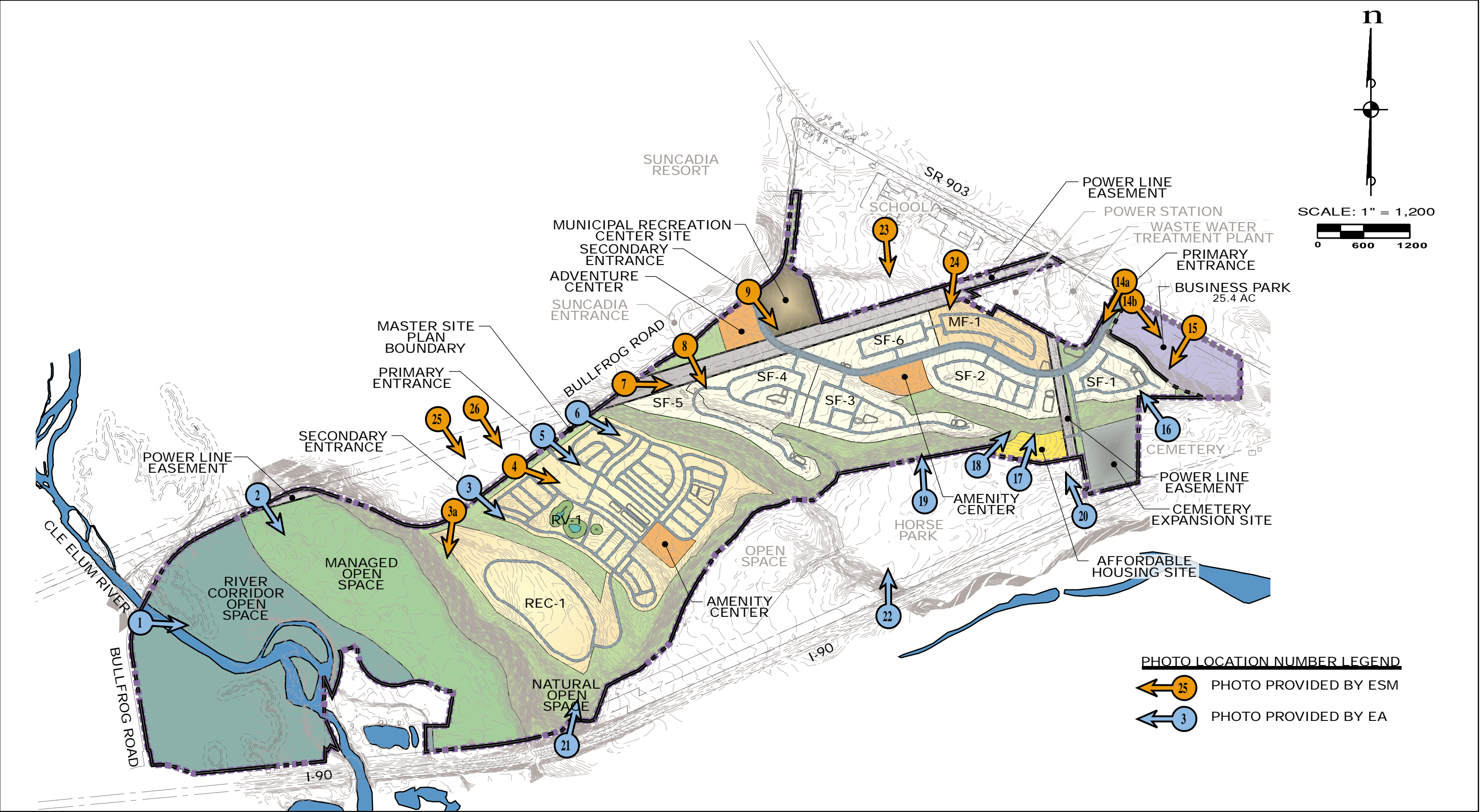
##### ***View Photosimulations/Cross-Sections***

Potential view impacts under SEIS Alternative 6 were analyzed in the DSEIS by preparing photo simulations from eleven viewpoints and cross sections from three viewpoints. These viewpoints represent publicly owned and publicly accessible places surrounding the proposed 47° North site and adjacent 25-acre property. Five of the photo simulations included in the DSEIS were from Bullfrog Road. As described in the DSEIS, views of proposed development under SEIS Alternatives 5 and 6 from Bullfrog Road would largely be blocked

by forested open space/buffers that would be retained onsite (including the 100-foot minimum buffer along the road), existing landforms on and offsite, and the distance to development. The greatest potential for views towards development from Bullfrog Road would be adjacent to the proposed RV resort in RV-1. However, the 100-foot perimeter buffer would provide at least partial screening of this area.

For this FSEIS, three additional cross-sections were prepared from viewpoints on Bullfrog Road to further study the potential for views toward proposed development under SEIS Alternative 6. The cross-sections were taken at Viewpoints #6, #8, and #9 (see **Figure 3-1**, Viewshed Photo Locations, and **Figure 3-2**, Viewpoint #6, **Figure 3-3**, Viewpoint #8, and **Figure 3-4**, Viewpoint #9). These cross-sections are described below.

- **Viewpoint 6 (Cross Section) – View of RV-1 from Bullfrog Road, Looking West (Figure 3-2)** – Coniferous trees on the site are visible in the foreground, mid-ground, and background from this viewpoint. A powerline easement is also visible in the mid-ground and a ridgeline in the background. As shown by the cross-section of this viewpoint, views of the proposed RV resort would likely be blocked from Viewpoint 6 by the density of existing trees associated with the 100-foot minimum buffer retained along the perimeter of the site, and the distance to the nearest RV unit (approximately 106 feet). Any possible views of RV units would be partially screened by the retained vegetation.
- **Viewpoint 8 (Cross Section) – View of SF-4 from Bullfrog Road, Looking South (Figure 3-3)** – Bullfrog Road and coniferous trees are visible in the foreground. Coniferous trees can be seen in the mid-ground and background. A ridgeline is also evident in the background. As shown by the cross-section of this viewpoint, views of single family residential development in SF-4 would be blocked from Viewpoint 8 by the density of the existing trees associated with the 100-foot minimum buffer retained along the perimeter of the site, and the distance to the nearest residential unit (approximately 464 feet).
- **Viewpoint 9 (Cross Section) – Views of SF-4 from Bullfrog Road, Looking Southwest (Figure 3-4)** – Bullfrog Road and coniferous trees are visible in the foreground, mid-ground, and background. As shown by the cross-section of this viewpoint, views of single family residential development in SF-4 would be blocked from Viewpoint 9 by the density of the existing trees associated with the 100-foot minimum buffer retained along perimeter of the site, and the distance to the nearest single family unit (approximately 1,184 feet). Note that the municipal/community recreation center site is adjacent to Bullfrog Road in the foreground of this viewpoint. Site plans and designs for the recreation center have not been developed at this point; therefore, the potential visibility of the center cannot be described at this time. However, the 100-foot minimum buffer retained adjacent to Bullfrog Road would provide at least partial screening of the center.

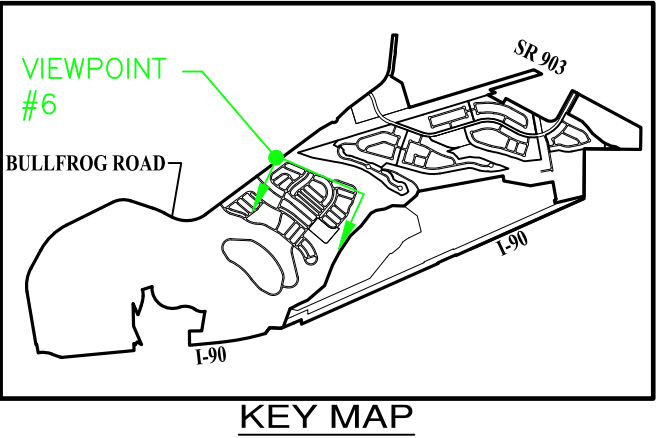
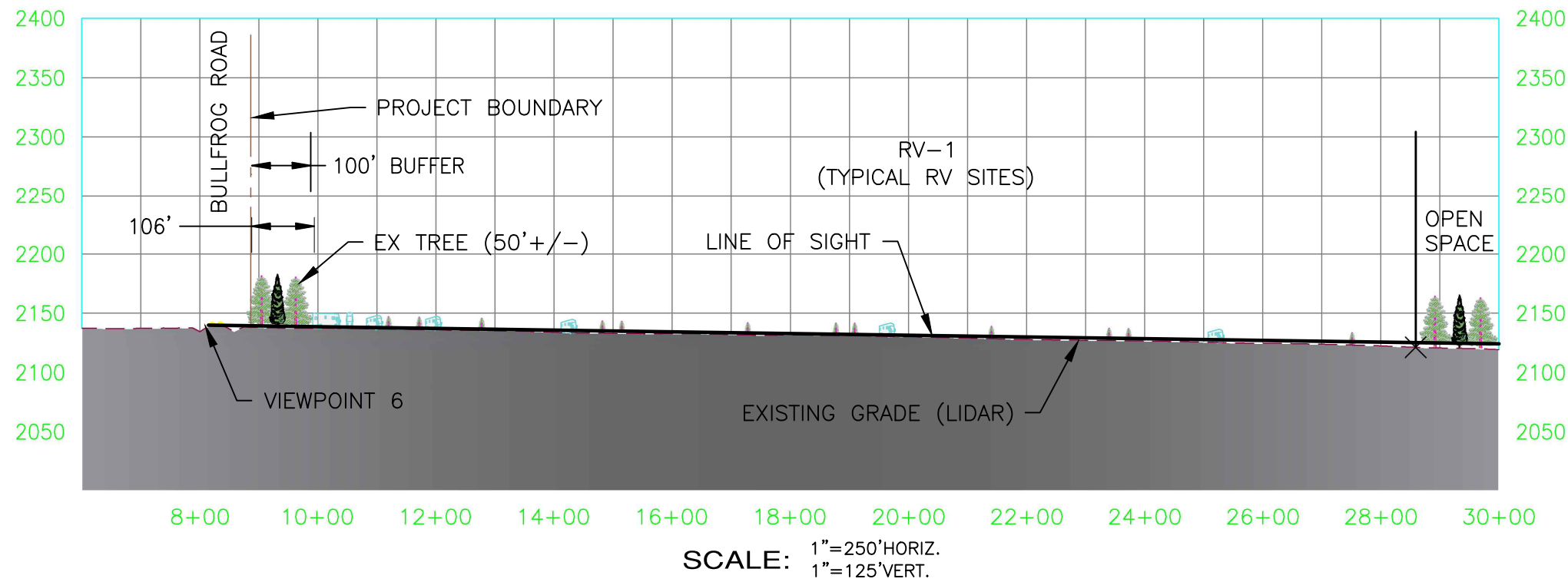


Source: ESM Consulting Engineers, 2020.

Figure 3-1 - Viewshed Photo Locations



VIEWPOINT 6



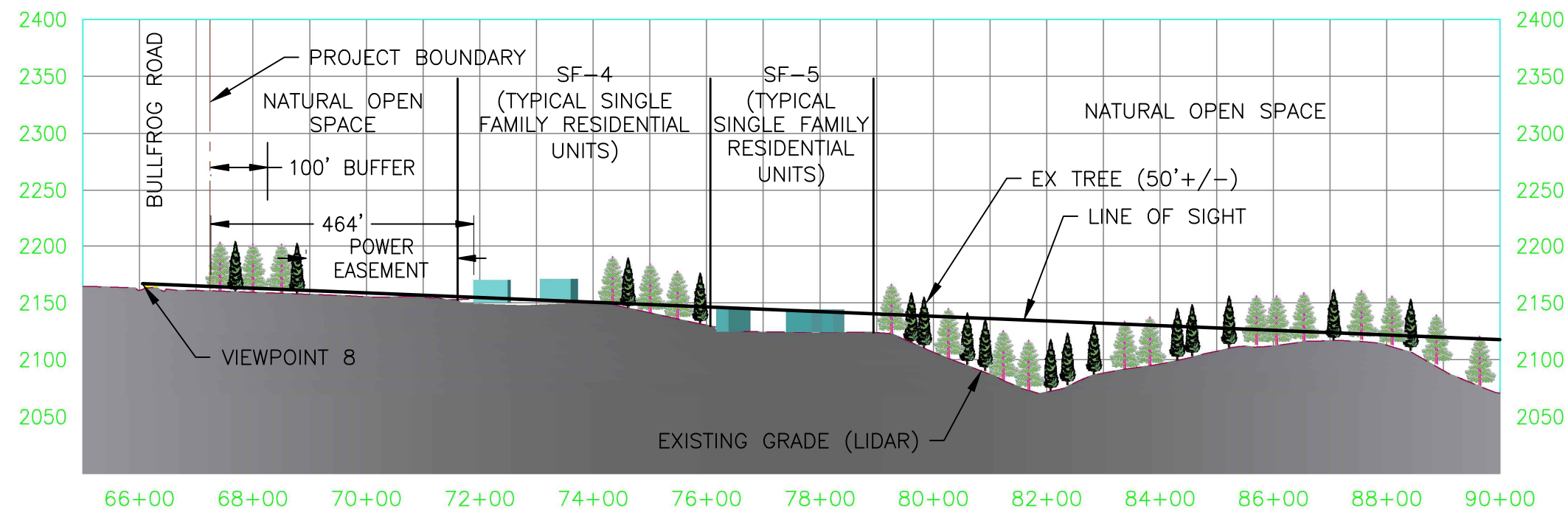
Source: ESM Consulting Engineers, 2020.  
Photo Source: EA



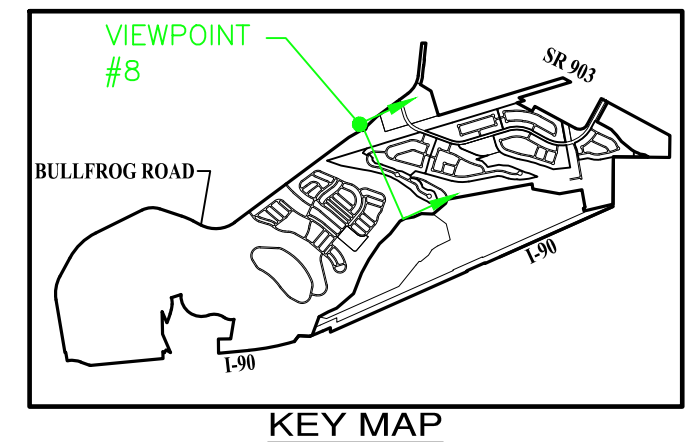
Figure 3-2  
Post Development Cross-Section View 6



VIEWPOINT 8



SCALE: 1"=250'HORIZ.  
1"=125'VERT.



KEY MAP

Source: ESM Consulting Engineers, 2020.  
Photo Source: EA

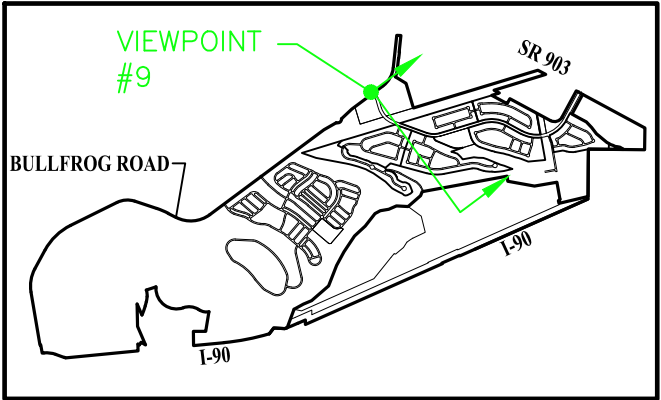


Figure 3-3

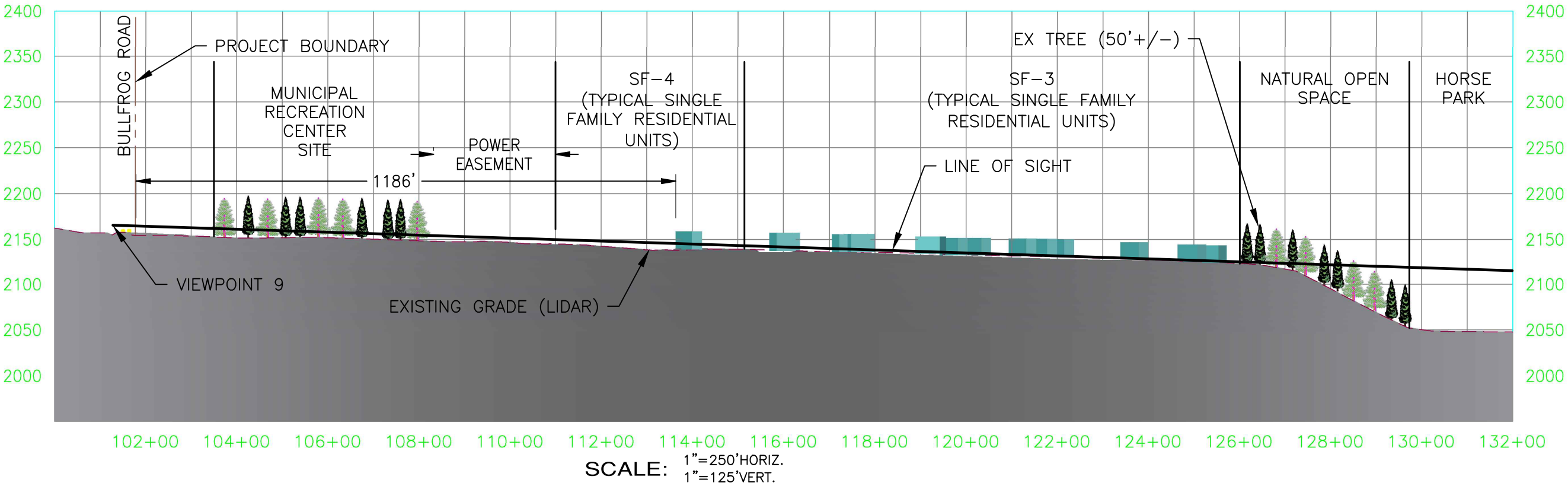
Post Development Cross-Section View 8



VIEWPOINT 9



KEY MAP



Source: ESM Consulting Engineers, 2020.  
Photo Source: ESM Consulting Engineers, 2020



Figure 3-4  
Post Development Cross-Section View 9

## *Extent of Potential View Impacts from Bullfrog Road*

Bullfrog Road adjoins the site for approximately 13,250 feet, generally along the site's northern boundary. The portion of the site's frontage along Bullfrog Road where proposed development under SEIS Alternative 6 would be closest is located adjacent to the RV-1 in the RV resort. This frontage is a maximum of 1,600 feet, or 12% of the site frontage. Views of proposed development would be blocked or diminished along most of the site frontage along Bullfrog Road (approximately 88%) due to the amount of forested open space/buffers, topographic separation, and distance to development. Views along the Bullfrog Road site frontage adjacent to the RV-1 area would likely also be blocked, entirely or partially, or screened and diminished by the 100-foot minimum forested buffer in this area. However, peekaboo views of RVs could be possible in certain locations where less dense vegetation is present. Therefore, as concluded in the DSEIS, views of proposed development under SEIS Alternatives 6 from Bullfrog Road would largely be blocked, in whole or in part. A comment that expressed disagreement with this conclusion is acknowledged.

## *2002 Development Agreement*

The 2002 Bullfrog Flats Master Site Plan Development Agreement contains the following condition of approval (Condition 28A) related to views from Bullfrog Road:

*The project shall include a minimum 100-foot buffer outside of and adjacent to the existing Bullfrog Road Right-of-Way, provided that if additional right-of-way is required for improvements to the Bullfrog Road/SR 903 intersection, the 100-foot buffer shall be measured after acquisition of any additional right-of-way at that location. This buffer shall be designed to protect the existing generally wooded character of the Bullfrog Road entrance to the City, and enhanced plantings may be required in certain areas to protect this character, provided that the buffer need not provide a total visual screen of the UGA development from Bullfrog Road. Developer agrees to place this buffer in a separate tract to qualify for open space tax classification pursuant to state law, as part of the preliminary plat approval(s) for Master Plat that includes the parcel(s) adjacent to Bullfrog Road. Developer or the homeowners' association for the UGA shall own and be responsible for any maintenance of these required buffers.*

While views of the site would be screened, the proposal would not be invisible; visual conditions would be consistent with the screening and buffering objectives of the 2002 Cle Elum UGA EIS and conditions of approval. Proposed development under SEIS Alternative 6 would provide a minimum 100-foot buffer adjacent to the existing Bullfrog Road right of way. This buffer would be preserved in its existing wooded character. If firewising or other maintenance is required, additional plantings could be provided. As described earlier in this section, views of development from Bullfrog Road would largely be blocked by the forested open space/buffers retained onsite (including the 100-foot minimum buffer along the road), existing landforms on and offsite, and the distance to development. Consistent with the

2002 Development Agreement, proposed development would preserve the existing generally wooded character of the entrance to the City and would largely screen the development.

### *Dark Sky*

As described in DSEIS Section 3.8, Aesthetics/Light & Glare, proposed development under the SEIS Alternatives would result in an increase in general on-site lighting during the evening hours at proposed residences, parks, and amenity/recreational centers onsite, which could be visible to surrounding areas as “sky glow” (artificial light that reflects off the nighttime sky and reduces the clarity of astronomical observation). This lighting impact would be minimized on the 47° North site by the proposed implementation of Dark Sky standards. As a result, significant sky glow impacts are not expected.

## **3-9. HOUSING, POPULATION, & EMPLOYMENT**

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### **3-9.1 2020 DSEIS**

DSEIS Section 3.9, Housing, Population, & Employment, discussed existing housing/population/employment conditions on and near the 47° North site, analyzed the impacts of the SEIS Alternatives on housing/population/employment, and identified mitigation measures to address impacts.

The DSEIS concluded that population and housing growth in and of themselves are not adverse impacts to the extent that they are planned for, and supporting infrastructure and services are planned and provided to support that growth. SEIS Alternatives 5 and 6 would generate a significant amount of housing, population, and employment growth in the City of Cle Elum. Comparatively, SEIS Alternative 6 would include fewer single and multi-family housing units and population than SEIS Alternative 5. An RV resort, with associated visitors but no permanent population, would be included in SEIS Alternative 6 that is not part of SEIS Alternative 5. The SEIS Alternatives would generate temporary employees during construction and permanent employees during operation of the project. More employees would be required during construction of SEIS Alternative 5 than of SEIS Alternative 6 because of the greater number of units and the method of construction (stick-built vs. manufactured housing). More permanent employees are also expected under SEIS Alternative 5 because of the significantly larger amount of commercial development.

### **3-9.2 2021 FSEIS**

#### **3-9.2.1 Affordable Housing**

##### **Comments Received**

L-13 (2), L-41 (1), L-47 (3), L-82 (5, 10, 20), L-91 (3)

Several comments addressed the affordable housing provided under SEIS Alternative 6, stating that either none or not enough was included. The Applicant commented on the factors used in the DSEIS affordable housing analysis, indicating that land lease costs were not included in the calculations of the single family (manufactured) housing.

##### **Response to Comments/Updated Information & Analysis**

As described in DSEIS Section 3.9, Housing, Population, & Employment, the 2019 City of Cle Elum Comprehensive Plan notes that housing affordability is typically defined as:

*Adequate, appropriate shelter, costing no more than 30% (including utilities) of the household's gross monthly income.*

Housing costing 30% or less (including utilities) of a household's gross monthly income is a measure of affordability commonly used by HUD and most other local agencies. By this definition of affordability, a household is considered "cost-burdened" when more than 30% of its monthly gross income is dedicated to housing. Many state and local housing agencies use 60% of Mean Household Income (MHI) as a target for affordable housing programs. Using 60% of the City's 2018 MHI of \$48,693, a monthly payment of \$730 or less (including utilities) would be considered affordable. Using 60% of the County's 2018 MHI of \$55,193, a monthly payment of \$828 or less (including utilities) would be considered affordable (see **Table 3-6**).

**Table 3-6**  
**AFFORDABLE HOUSING – SEIS ALTERNATIVE 6**

Jurisdiction	Mean Household Income (MHI) <sup>1</sup> (Annual)	60% of MHI (Annual)	30% of Household Income (Annual/Monthly)	47° North SF Housing Costs (Monthly)	47° North MF Housing Cost (Monthly)
City of Cle Elum	\$48,693	\$29,216	\$8,765/\$730	\$1,218 - \$1,663	\$1,200 - \$1,800
Kittitas County	\$55,193	\$33,115	\$9,935/\$828	\$1,218 - \$1,663	\$1,200 - \$1,800

**Source: Sun Communities 2020.**

<sup>1</sup> Based on 2018 data from the *U.S. Census American Community Survey (ACS), 2014-2018, 5-year Estimates*.

The FSEIS has recalculated the affordability of housing based on updated information provided by Sun Communities, the Applicant. According to the Applicant, the expected price range for the single family manufactured housing is between \$150,000 and \$250,000. Based on several assumptions, this could equate to a monthly mortgage payment of \$518 to \$863.<sup>7</sup> However, monthly rental costs for individual home site land leases were not available at the time the DSEIS was prepared and were not included in estimates of housing cost. For this FSEIS, the Applicant preliminarily estimated that monthly lot rental rates would be \$700 to \$800, resulting in a total monthly housing cost of from \$1,218 to \$1,663 for the single family units. The Applicant preliminarily estimated a monthly rent of \$1,200 to \$1,800 for the multi-family units.<sup>8</sup> As noted above, a household is considered cost-burdened when more than 30% of its monthly gross income is dedicated to housing. Using 60% of the City and County 2018 MHI, the estimated monthly mortgage/land lease payment of \$1,218 to \$1,663 and monthly rent of \$1,200 to \$1,800 would not be considered affordable to City/County residents earning 60% of MHI (\$730 in the City; \$828 in the County).

As described in DSEIS Section 3.9, Housing, Population, & Employment, a useable area of 7.5 acres is required to be conveyed to the City of Cle Elum, or another public or non-profit entity approved by the City, to be developed for affordable housing. Note that the Applicant could also elect to develop the affordable housing and could disperse it on-site. Under SEIS Alternative 6, a 6.8-acre affordable housing site has been identified in the southwestern

<sup>7</sup> The estimated mortgage payment range is based on the following assumptions: a \$120,000 to \$200,000 loan, 30-year mortgage, 12 payments per year, 20% down payment, and 3.18% interest rate.

<sup>8</sup> The preliminary land lease and housing cost estimates provided by the Applicant are subject to change due to development costs, final project requirements, and other outstanding factors.

portion of 47° North. Either this site would need to be enlarged or development density could be increased to meet the 2002 Bullfrog Flats Development Agreement assumption of providing 50 affordable housing units at the density assumed in the 2002 Development Agreement.

## **3-10. AIR QUALITY / GREENHOUSE GASES (GHGS)**

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### **3-10.1 2020 DSEIS**

DSEIS Section 3.4, Air Quality/GHG and Appendix F discussed existing air quality/GHG in the site vicinity, analyzed the impacts of the SEIS Alternatives on air quality/GHGs, and identified mitigation measures to address impacts.

The DSEIS concluded that SEIS Alternatives 5 and 6 would generate air emissions during construction and operation of proposed development on the site, including GHG emissions. Air emissions during construction (e.g., dust and pollutants) would largely be controlled through compliance with City construction regulations. Tailpipe emissions from vehicles traveling on public roads would be the major source of air pollutant emissions associated with operation of the SEIS Alternatives. However, the site area is in an attainment area for all criteria pollutants and, therefore, it is unlikely that increased traffic would cause localized air pollutant concentrations (“hot spots”). The SEIS Alternatives would contribute to GHG emissions; however, the emission increase would be only a small fraction of total statewide annual GHG emissions and no single project emits enough GHG emissions to solely influence global climate change. Therefore, no significant air quality impacts are anticipated.

### **3-10.2 2021 FSEIS**

#### **3-10.2.1 CO<sub>2</sub> Emissions & Climate Change**

##### **Comments Received**

L-82 (7, 21, 31)

One commenter stated that the DSEIS did not provide a realistic discussion of the climate effect of removing the forest and adding CO<sub>2</sub> with the proposed project. The transportation-related impacts of CO<sub>2</sub> emissions, particularly from the RVs, were also mentioned.

##### **Response to Comments/Updated Information & Analysis**

The DSEIS described how the decay of biomass releases CO<sub>2</sub> to the atmosphere and vegetation that has been permanently removed no longer removes CO<sub>2</sub> during natural photosynthesis. DSEIS Appendix F also discussed how all future development, including the proposed 47° North project, contributes to worldwide emissions of GHGs, which in turn contributes to potential future effects of global climate change (e.g., changes in seasonal temperature, seasonal precipitation, and local sea level rise) (see DSEIS Appendix F for details).

The DSEIS provided an overview of state and federal climate change policy; an estimate of GHG emissions with the SEIS Alternatives; and an analysis of impacts that would result from

GHG emissions (including climate change). GHG emissions associated with recreational vehicle camping were incorporated into estimated vehicle miles traveled and GHG emission estimates (see DSEIS Section 3.4, Air Quality/Greenhouse Gas Emissions, and Appendix F for details).

Transportation-related GHG (including CO<sub>2</sub>) emissions were estimated on an annual basis using the methods described in DSEIS Appendix F. Transportation-related GHG emission estimates under SEIS Alternative 6 (which incorporated RV traffic) were summarized in DSEIS Section 3.4, Air Quality/Greenhouse Gas Emissions, Table 3.4-2. As shown, SEIS Alternative 6 would emit less transportation-related GHG emissions than SEIS Alternative 5 (23,972 vs. 56,030 metric tons CO<sub>2</sub>e per year).

## 3-11. OTHER TOPICS

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There are a few topics that were raised in the DSEIS comments that do not fall within the elements of the environment above but relate to the SEIS. These topics are described below and responses provided.

### **3-11.1 Opinions About the Project**

#### **Comments Received**

L-41 (1), L-47 (4, 5), L-50 (1-3), L-55 (1-3), L-54 (2), L-58 (5), L-70 (2), L-82 (1-4, 18, 20, 23, 29, 30, 32), L-91 (1, 2, 4), L-92 (4, 5), L-99 (7) (repeated in L-94 [1])

Several comments expressed opposition to the project. Concerns were voiced in a few comments about the quality and maintenance of Sun Communities' developments. A couple of comments suggested other types of development for the site. Comments asked for information on the impacts of RV resort and manufactured housing based on information on other Sun Communities resorts.

#### **Response to Comments/Updated Information & Analysis**

##### *For/Against the Project*

SEPA requires that a Final SEIS must respond to substantive comments submitted on a Draft document (WAC 197-11-560). Comments that provide expressions of support or opposition to a proposal without reference to factual or substantive environmental impact do not provide sufficient information on which to base a response. These comments are noted for the record but do not warrant further discussion.

##### *Quality & Maintenance*

The comments questioning the quality and maintenance of Sun Communities' developments are noted; these comments do not address elements of the environment that SEPA requires to be addressed in an SEIS. DSEIS and FEIS **Chapter 2** articulate the Applicant's vision for the 47° North, which is to incorporate high development and infrastructure standards into the project. **Chapter 2** contains descriptions and examples of the of the 47° North project design. Proposed development would be consistent with architectural design and materials guidelines that would 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 would include muted colors and textures that are intended to blend into the existing natural setting and be comprised primarily of wood and stone. Landscaping would be provided throughout the site and would create transitions and buffers between various land uses on and adjacent to the site, where necessary. Landscaping with native plants is proposed to help visually and aesthetically connect the site to the surrounding area. It is acknowledged that subjective opinions and

aesthetic preferences also influence an individual's perceptions of quality and are not amenable to precise analysis.

DSEIS and FSEIS **Chapter 2** describe the intended lease/ownership structure of the project. Sun Communities would retain ownership of the underlying land in the project, and the company would lease individual home sites to purchasers and renters. Sun Communities would own all the buildings and sites in the RV resort and would lease the sites. The land owned by Sun Communities could be maintained by the homeowner or by Sun Communities, which would be specified and enforceable by contract. All the multi-family homes would be leased and Sun Communities would maintain all the leased lots. Sun Communities is a public company and their development projects are long-term investments. Sun Communities' retention of the underlying land provides an economic incentive to maintain the project so that it is attractive to home buyers, apartment renters and recreational users.

### *Different Uses*

The suggestions for different uses in the project (e.g., more locally-owned commercial development, schools, low-cost housing that is owned outright, in-fill development) are noted. These uses may or may not meet the Applicant's objectives for the project (see DSEIS and FSEIS **Chapter 2** for the Applicant's objectives). However, comments that express preferences for alternative uses are noted as expressions of personal preference or opinion. The approximately 25-acre property owned by New Suncadia adjacent to 47° North site could be developed in approximately 150,000 sq. ft. of commercial uses, including grocery store, retail, restaurant, and medical office uses. The timing of this commercial development is not known. Thirty-five (35) acres were dedicated to the Cle Elum School District in 2003 for expansion of the school campus by the previous owner of the site. In communications for the DSEIS, the Cle-Elum School District did not indicate a desire or need for a new school on the site (see DSEIS Section 3.12, Public Services). The affordability of the homes in 47° North is discussed in DSEIS Section 3.9, Housing Population, & Employment, and updated in FSEIS Section 10. As described in this FSEIS, the proposed single and multi-family housing under SEIS Alternative 6 would not be affordable to households earning 60% of the City/County mean household income. However, a 6.8-acre site for affordable housing is included in the development. The Applicant indicates that they intend to provide housing that is financially accessible for both local and public service employees. The proposed project does not represent infill development; although the site is located in the City's UGA and is undeveloped; an approved Master Site Plan and Development Agreement apply to the property and are currently in effect.

### *Impacts of Other Sun Communities*

Updated transportation, utilities, and police services information and analysis are provided in this FSEIS to account for data provided by the Applicant (or other agencies) derived from other Sun Communities developments of similar size and scope. The FSEIS transportation

analysis indicated that based on the new data, the average occupancy of the RV resort on weekdays during the peak summer months is anticipated to be a maximum of 50% rather than the 100% assumed in the DSEIS. Therefore, based on statistical occupancy data provided by the Applicant from similar RV resorts, it appears that the DSEIS weekday PM peak hour trip generation for the RV resort is likely overestimated and the LOS analysis should be considered conservative. The water and sewer demand of 47° North was also updated based on data provided by the Applicant. This data showed that the RVs and manufactured homes would generate less demand than assumed in the DSEIS. The updated police services analysis determined that the RV component of 47° North could potentially generate between 83 and 163 annual calls for police service, based on the annual calls for police service from other Sun Communities RV resorts of similar size and between 2015 and 2019. These calls could primarily relate to noise, theft, animal control, medical-related, and alarms/public assistance, similar to the other Sun Community RV resorts (see FSEIS Section 3-2, **Transportation**, and **Appendix A**; Section 3-4, **Utilities**, and **Appendix C**; and Section 3-5, **Public Services**, for details).

### **3-11.2 Coordination with City of Roslyn**

#### **Comments Received**

L-5 (1-3)

The City of Roslyn requested that the City of Cle Elum establish direct communication between the two cities regarding the impacts of the 47° North project on City of Roslyn's infrastructure, environment, and long-term fiscal health.

#### **Response to Comments/Updated Information & Analysis**

The City of Roslyn is a party of record for the 47° North project. As such, Roslyn will be given notices about the status of the environmental review, application, hearings, and approvals for the project. The City will have opportunities to comment at key junctures (e.g., on the modified Master Site Plan application, and at public hearings during the land use review process). The City of Cle Elum will also coordinate directly with the City of Roslyn on the potential impacts of the project on Roslyn, as appropriate.

### **3-11.3 Ridge Settlement Agreement**

#### **Comments Received**

L-63 (1-10)

One commenter had several comments about the applicability of the Ridge Settlement Agreement to the 47° North SEIS. Specifically, the comments asked that the FSEIS analyze the impacts of termination of the agreement in 2013.

### Response to Comments/Updated Information & Analysis

As described in DSEIS and FSEIS **Chapter 2**, a Settlement Agreement was executed in 2001 between Trendwest (the former owner of the Suncadia Master Plan Resort [MPR]) and RIDGE (a Roslyn-based conservation organization). The Settlement Agreement regulated numerous aspects of development in the MPR and the UGA (now the 47° North property). In 2013, Kittitas County Superior court terminated the Settlement Agreement because specific provisions of the Agreement had not been met. Therefore, the Settlement Agreement exists only as an historical document and has no effect on development of the MPR or the UGA (now 47° North) properties. This SEIS is focused on the 47° North proposal and the termination of the Agreement and its provisions are not relevant to the proposal and do not require further analysis.

### **3-11.4 Suncadia Resort Construction Rate**

#### Comments Received

L-63 (7)

A comment questioned the average construction rate in the Suncadia resort used in the DSEIS cumulative impact analyses.

### Response to Comments/Updated Information & Analysis

For the analysis of the cumulative impacts of the 47° North project, together with other approved and anticipated development in the area, the SEIS assumed a rate of construction in the Suncadia resort. The assumption of 48 units per year was based on the average rate of construction in the resort over the previous approximately 18 years, using data provided by Suncadia. It is acknowledged that this rate includes start-up of construction of the resort and downturns in the real estate market. However, since it covers a span of 18 years, it was determined to represent a reasonable assumption for the average rate of construction in the Suncadia resort (see DSEIS Section 3.9, Housing, Population, & Employment, for details).

### **3-11.5 Impact Fees**

#### Comments Received

L-82 (17)

One comment asked whether impact fees would be implemented.

### Response to Comments/Updated Information & Analysis

Currently, the City of Cle Elum has not adopted any impact fee programs. To mitigate potential fiscal impacts to the City of Cle Elum, the DSEIS Section 3.15, Fiscal & Economic Conditions, indicated that a periodic fiscal monitoring program (e.g., in two to five-year increments) could be implemented during and/or following buildout of 47° North. The DSEIS also noted that the 2002 Development Agreement identifies several conditions to mitigate fiscal shortfalls to the City and to ensure existing citizens and ratepayers would not

suffer negative financial impacts of the development. These conditions include: allowing a Municipal Facilities and Services Expansion Plan to guide capital expansions; making fiscal shortfall mitigation payments; paying for the development's share of planning, water/wastewater treatment plant construction, and permit fees; and, coordinating security forces with police and fire services. Mitigation agreements could also be executed with other service purveyors (e.g., a school mitigation agreement similar to the December 2001 letter from Trendwest to the School District and the School District Mitigation Agreement executed in January 2003 between Trendwest and the School District). Future negotiations between the City and the Applicant could consider including these measures in a new or updated Development Agreement.

### **3-11.6 Concurrency**

#### **Comments Received**

L-99 (5) (repeated in L-94 [1])

One comment asserted that concurrency had not been addressed in the DSEIS.

#### **Response to Comments/Updated Information & Analysis**

Concurrency is one of the goals of the Washington State Growth Management Act (GMA) and refers to the timely provision of public facilities in relationship to the planning and actual demand for such facilities. To maintain concurrency means that adequate public facilities are in place to serve new development as it occurs or within a specified time period. GMA's provisions for transportation concurrency state that needed transportation improvements, or strategies to provide such improvements, must be in place at the time of development or that a financial commitment is in place to complete the improvements or strategies within six years (RCW 36.70A.070(6)(b)). Local governments have flexibility regarding how to apply concurrency within their plans, regulations, and permit systems.

The DSEIS and this FSEIS appropriately address concurrency. The DSEIS evaluated existing and planned public infrastructure in the site vicinity. Existing deficiencies in the infrastructure, as well as deficiencies that would result from or that the SEIS Alternatives would contribute to were described for the study years (2025, 2031, 2037, and 2051, which correspond to buildout of all or parts of the SEIS Alternatives), and appropriate mitigation were identified (see DSEIS Section 3.12, Public Services, Section 3.13, Transportation, and 3.14, Utilities, and Appendices B, and J for details). Updated analyses of public infrastructure were conducted for this SEIS (see FSEIS Section 3-2, **Transportation**, and Section 3-4, **Utilities**, and **Appendices A and C** for details). The actual facility improvements and timing of the mitigation is anticipated to be established during review of a project application and reflected in a new or updated Development Agreement for the 47° North development. The City will also update its Comprehensive Plan and Transportation Improvement Program (TIP) to reflect required improvements during its plan update cycle; the TIP will address timing and costs in the context of concurrency. The specific design and costs of individual improvements have not been and cannot be determined at this time.

However, preliminary, rough costs of transportation and water system improvements were estimated for this FSEIS (see FSEIS Section 3-5, **Public Services**). Also see the responses to comments on services and infrastructure funding in FSEIS Section 3-7, **Fiscal & Economic Conditions**.

### **3-11.7 General Adequacy of SEIS**

#### **Comments Received**

L-29 (2), L-54 (2), L-58 (4), L-82 (12, 16), L-87 (2), L-99 (8, 9, 50) (repeated in L-94 [1])

A few commenters requested that the City prepare a complete, “high-quality” SEIS for 47° North. One comment indicated that a second DSEIS should be prepared to adequately address the impacts of the SEIS Alternatives and required mitigation measures.

A couple of comments requested that the impacts of the RV resort be analyzed separately, or in a separate SEIS.

#### **Response to Comments/Updated Information & Analysis**

The 47° North SEIS provides comprehensive environmental review of all the elements of the environment analyzed in the 2002 Cle Elum UGA EIS; greenhouse gas emissions was included as an additional element in the DSEIS. Considerable additional information and analysis was provided in the DSEIS to update the analysis in the 2002 Cle Elum UGA EIS. Updated analysis is also included in this FSEIS. The City has managed preparation of the SEIS and has reviewed its analysis, conclusions, and recommendations. The City concludes that it is complete, uses appropriate methodology, and is consistent with the spirit, intent, and specific requirements of the SEPA statute and SEPA rules.

The RV resort component of SEIS Alternative 6 is described and analyzed – both separately and together with full development of the 47° North project – in the SEIS. Examples of where the RV resort was evaluated separately in the DSEIS include: Section 3.6, Land Use (the land use impacts of the RV resort, including its layout in the site plan, proxy population, and seasonal activity levels were discussed); Section 3.8, Aesthetics/Light & Glare (views toward the RV resort were simulated and evaluated); 3.11, Parks & Recreation (the impacts of the RV resort users on parks and recreational facilities in the area were discussed); 3.12, Public Services (the specific impacts of the RV resort on police service were analyzed); 3.13, Transportation (the trip generation rate of the RV units was calculated and taken into account in the analysis); and, 3.14, Utilities (the water and sewer demand of the RV resort were calculated and taken into account in the analysis). Note that in many instances the DSEIS documented that the impacts of the RV sites would be less than a comparable number of residential units because the visitors would not be permanent residents. SEPA discourages “piecemeal” review of components of a project, as it does not account for the full impacts of a project. It has been determined that the amount and level of discussion of the RV resort is adequate and additional analysis or a separate DSEIS for this component of the project is not necessary. In addition, the RV resort is an integral and fundamental element of the 47° North proposal. The SEPA rules require that elements of a proposal that

are in effect a single course of action must be evaluated in the same environmental document (WAC 197-11-060 (3)(b)). Considering the RV resort in a separate environmental document would violate this requirement.

### **3-11.8 Primary vs. Second/Vacation Homes**

#### **Comments Received**

L-99 (34) (repeated in L-94 [1])

As indicated in FSEIS Section 3-2, **Transportation**, one comment suggested that the RV sites would turn over on weekends, increasing the trips and associated impacts.

#### **Response to Comments/Updated Information & Analysis**

Based on information provided by Sun Communities (the Applicant), the DSEIS assumed that all proposed single and multi-family residential units (707 units) under SEIS Alternative 6 would be primary residences, with permanent full-time population. The analysis of impacts and identification of mitigation measures in the DSEIS was based on this assumption.

For purposes of analysis in this FSEIS, and in response to a comment received on the DSEIS, the Applicant provided information about the possible use of some portion of the single family residential units in 47° North as second/vacation homes. This information is provided for purposes of analysis, should be considered speculative, and could change over time. Although all residential units are planned as primary units, Sun Communities would not exclude potential buyers based on their decision to use a residence as a primary or second home; sales and use of units would be determined by market demand and buyers' preferences. Moreover, it is also considered likely that some proportion of any units initially purchased as second homes would become primary residences over time. Second homes are considered more likely to be single family units, and all the multi-family residential units are, therefore, still assumed to be primary residences. Subject to these caveats, the Applicant estimates that approximately 35% of the single family units, 184 units total, could initially be second homes.

#### ***Population Assumptions***

Second homes in 47° North would not generate permanent, year-round population, but would generate a seasonal population, typically during the peak visitor period, on summer weekends. There are several variables that would contribute to this population, such as seasonal occupancy and size of household. The metrics of population could be similar to those used to generate the proxy population of the RVs in the DSEIS (e.g., three people per RV and 50% occupancy), or could be somewhat different. In any case, population would be concentrated in the peak visitor periods so the second homes would generate less population than the primary homes/units.

## *Environmental Impacts*

Below are brief discussions of the possible impacts with the new assumptions for primary versus second homes in 47° North (e.g., 35% of the single family could initially be second homes).

**Earth; Water Quantity & Quality; Plants, Animals, & Wetlands; Relationship to Plans & Policies; Aesthetics/Light & Glare; and Historic & Cultural Resources.** Development assumptions, such as clearing, grading, pervious/impervious surface area, number and type of residential units, and site layout, would not change. Whether units are considered primary or secondary would not, therefore, affect many of the analysis areas studied in the DSEIS, including earth; water quantity and quality; plants, animals, and wetlands; relationship to plans and policies; aesthetics/light and glare; and historic and cultural resources.

**Land Use, Parks & Recreation, and Public Services.** The analysis of impacts to land use, parks and recreation, and public services largely or partly relate to population: the greater the population the greater the impacts. The population generated by the second homes would primarily occur during the summer weekends; therefore, the associated impacts on these environmental elements would be concentrated during this time period as well. Because the second homes would generate less population than the primary homes/units, the overall impacts on these environmental elements would be less than described in the DSEIS. Other aspects of the impacts on land use and noise are expected to be similar to those discussed in the DSEIS because the number, types, and locations of the residential units onsite would be the same regardless of whether they are primary or second homes. Similar to RV site visitors, the second home occupants would contribute to the need for regional, county, and local parks and recreational facilities because they are often coming specifically to use the area's recreational resources. However, this population would not be present year-round, and the entire site would provide substantial recreational amenities, some of which would be reserved for the site residents only, including second home residents. In the case of schools, the second homes are not expected to generate any students or impacts on schools because potential students would not reside in the homes year-round and would not attend local schools.

**Transportation.** As discussed in Section 3-2, **Transportation**, vehicular trip generation for the second homes is expected to be lower than for the primary homes during the weekday and Sunday PM peak hours, but higher during the Friday PM peak hour. However, no additional intersections are expected to operate at non-compliant LOS during the Friday summer PM peak hour (see the comparison to the failing intersections identified in Table 10 in FSEIS **Chapter 1** and **Appendix A**). Similarly, no non-compliant intersections are anticipated to operate at compliant LOS during the weekday and Sunday summer PM peak hours due to the assumed second homes. This conclusion applies to all transportation analysis study years.

**Air Quality/GHG and Noise.** Generally, the air quality/GHG and noise impacts would be similar to those discussed in the DSEIS if a portion of the single family residential units are second homes. This is because the numbers, types, and locations of residential units would be the same. However, the air emissions and noise from traffic generated during operation of the second homes would be concentrated in the peak periods of recreational use, during the Friday summer PM peak hour, and would be correspondingly lower on average during weekdays and Sundays.

**Utilities.** Because utility infrastructure is required to be designed for peak use, the same infrastructure would need to be built, regardless of whether the homes in 47° North are primary or second homes. However, the annual demand for utilities, including sewer, water, and solid waste services, and resulting impacts would be less for second homes than primary homes because the homes would not be occupied year-round.

**Economic & Fiscal Conditions.** Assuming a portion of the single family residential units would be second homes, the analysis of economic and fiscal conditions under SEIS Alternative 6 would largely remain as described in the DSEIS and updated in this FSEIS (see DSEIS Section 3.15 and DSEIS Appendix K, and FSEIS Section 3-7, **Fiscal & Economic Conditions**, and **Appendix E**). Likely, the overall revenues from sales taxes would be less, however, because the second homes would not accommodate permanent population that would make purchases year-round.