

## Meagan Hayes

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**From:** Planning  
**Sent:** Friday, September 10, 2021 7:02 AM  
**To:** Meagan Hayes; Kathi Swanson; Ken Ratliff; Mickey Holz; Ruston Weaver; Steven Harper; Beth Williams; John Glondo; Matthew Lundh; Jay McGowan  
**Subject:** FW: 47 Degrees North Major Amendment

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**From:** Corrie Reagan <corrienichole@hotmail.com>  
**Sent:** Thursday, September 9, 2021 9:47 PM  
**To:** Planning <planning@cleelum.gov>  
**Subject:** 47 Degrees North Major Amendment

Hello,

I would just like to voice my concerns as the Chief of the Roslyn Fire Department about the plans for 47 degrees north. I feel that there is not sufficient planning or infrastructure in place for a significant increase in population as far as schools, traffic plans, police, fire, emergency services, hospitals, and other public services. I feel that there is a major deviation as far as the previously approved subdivision plan. There will be a significant increase in population without any address to the afore mentioned services. Taxpayers will see significant increases and traffic will be impacted greatly in the area. I urge you, as a citizen, and as a member of the EMS community to reconsider you stance on the 47 degrees north project.

Thank you,  
Corrie Reagan  
Chief  
Roslyn Fire Department

Sent from [Mail](#) for Windows

## Kathi Swanson

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**From:** Corrine Camuso <Corrine\_Camuso@Yakama.com>  
**Sent:** Monday, August 16, 2021 1:57 PM  
**To:** Kathi Swanson; Planning; Jay McGowan  
**Cc:** Casey Barney; Jessica Lally; Noah Oliver; sepa@dahp.wa.gov  
**Subject:** Re: 47 Degrees North Notice of Application  
**Attachments:** YNCRP Letter Bullfrog UGA Master Site Plan 8.16.21.pdf

Good afternoon,

Please see the attached.

Regards,

Corrine Camuso  
Yakama Nation  
Cultural Resources Program Archaeologist  
Office 509-865-5121 ext. 4776

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**From:** Kathi Swanson <kswanson@cleelum.gov>  
**Sent:** Friday, August 13, 2021 12:05 PM  
**To:** Kathi Swanson  
**Subject:** 47 Degrees North Notice of Application

Please see the attached Notice of Application for the Sun Communities Major Modification, 47 degrees North. Information regarding questions that you may have are included within the Notice.

Kathi Swanson  
CITY CLERK



119 W First Street  
Cle Elum, WA. 98922  
(509) 674-2262 ext. 103  
[kswanson@cleelum.gov](mailto:kswanson@cleelum.gov)  
[www.cityofcleelum.com](http://www.cityofcleelum.com)



**Confederated Tribes and Bands of the Yakama Nation  
Established by the Treaty of June 9, 1855**

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Post Office Box 151  
Toppenish Washington 98948

Planning Department  
City of Cle Elum  
119 W First Street  
Cle Elum, WA 98922

August 16, 2021

**Subject: Bullfrog UGA Master Site Plan and Development Agreement Notice of Application Proposed Major Modification, Sun Communities 47 Degree North**

Thank you for contacting the Yakama Nation Cultural Resource Program (CRP) regarding the Bullfrog UGA Master Site Plan and Development Agreement Notice of Application Proposed Major Modification, Sun Communities 47 Degree North in Kittitas County. The project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855 (12 Stat. 951), between the Yakama Nation and the United States Government. The Treaty set forth that the Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources.

Yakama Nation CRP previously submitted comments with regards to the draft EIS and archaeological report. The report was amended but did not satisfy concerns as the archaeological survey was inadequate to identify resources. Large areas of the proposed development were not surveyed for cultural resources. Yakama Nation CRP submitted formal comments on April 30, 2021 stating we found the *"SEIS deficient in addressing the cumulative effects and impact the undertaking will have on cultural sites"*. We recommended our concerns be remedied in the EIS process or condition the Record of Decision, however we have not received a formal response to these comments. As stated in the April 30, 2021 letter, the agreement should be conditioned with the following:

- The area designated as 'future commercial space' will require cultural resources investigation.
- The 'river corridor open space' will require cultural resource investigation as it was not surveyed as part of the SEIS.
- The 'managed open space' will require additional cultural resource investigations as known archaeological sites were not revisited and the area was not entirely covered due to the methods employed.
- Sites not revisited within the project area will require additional cultural resource investigations (i.e. 45KT3332, 45KT1019, 45KT1376, 45KT1368, 45KT1484, 45KT1227). The proponent will need to engage directly with the Yakama Nation Cultural Resources Program to address cultural resource concerns in this area.

- Future actions within 'future commercial space', 'river corridor open space', and 'managed open space' may require additional work as requested by the Yakama Nation Cultural Resources Program during and permitting may be conditioned pursuant to this request.

We request a formal response to our comments above. Please contact me or staff archaeologists if you have any questions regarding the above.

Sincerely,

A handwritten signature in black ink that reads "Casey Barney". The signature is written in a cursive, slightly slanted style.

Casey Barney  
Cultural Resources Program Manager  
Yakama Nation  
509-865-5121 ext. 4378

## Kathi Swanson

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**From:** Dan Carlson <dan.carlson@co.kittitas.wa.us>  
**Sent:** Monday, August 16, 2021 4:23 PM  
**To:** Planning  
**Subject:** Bullfrog Master Site Plan and Development Agreement Major Modification

As we discussed on the phone, I have a few questions regarding this project:

1. What criteria are being used to evaluate this application? Are there regulations in code, state law, etc. that apply? Does the approval criteria include the conditions of the original development agreement? If so, can I get a copy of the original development agreement?
2. Will future subdivisions, binding site plans, etc. be subject to a public process where the county will be able to provide comments and mitigating conditions can be applied to potential approvals?

Please let me know. Thank you.

**Dan Carlson, AICP**  
Community Development Services Director  
Kittitas County  
411 N Ruby ST, Suite 2  
Ellensburg WA 98926  
(509) 933-8244  
[dan.carlson@co.kittitas.wa.us](mailto:dan.carlson@co.kittitas.wa.us)

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## Kathi Swanson

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**From:** Dan Carlson <dan.carlson@co.kittitas.wa.us>  
**Sent:** Friday, August 20, 2021 1:46 PM  
**To:** Planning  
**Subject:** FW: Bullfrog Master Site Plan and Development Agreement Major Modification

Please provide an update on the status of the request below. The deadline for providing comments on this project is one week from today, and we need to know what criteria the application is being reviewed under in order to provide comments. Please provide this information as soon as possible. Thank you.

### Dan Carlson, AICP

Community Development Services Director  
Kittitas County  
411 N Ruby ST, Suite 2  
Ellensburg WA 98926  
(509) 933-8244  
[dan.carlson@co.kittitas.wa.us](mailto:dan.carlson@co.kittitas.wa.us)

**From:** Dan Carlson  
**Sent:** Monday, August 16, 2021 4:23 PM  
**To:** 'planning@cleelum.gov' <planning@cleelum.gov>  
**Subject:** Bullfrog Master Site Plan and Development Agreement Major Modification

As we discussed on the phone, I have a few questions regarding this project:

1. What criteria are being used to evaluate this application? Are there regulations in code, state law, etc. that apply? Does the approval criteria include the conditions of the original development agreement? If so, can I get a copy of the original development agreement?
2. Will future subdivisions, binding site plans, etc. be subject to a public process where the county will be able to provide comments and mitigating conditions can be applied to potential approvals?

Please let me know. Thank you.

### Dan Carlson, AICP

Community Development Services Director  
Kittitas County  
411 N Ruby ST, Suite 2  
Ellensburg WA 98926  
(509) 933-8244  
[dan.carlson@co.kittitas.wa.us](mailto:dan.carlson@co.kittitas.wa.us)

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## Kathi Swanson

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**From:** Jay McGowan  
**Sent:** Tuesday, August 24, 2021 9:03 AM  
**To:** Planning; Meagan Hayes; Gregg Dohrn - GRDohrn & Associates (Greggdohrn@comcast.net)  
**Cc:** Steven Harper; Beth Williams; Mickey Holz; Ken Ratliff; John Glondo; Matthew Lundh; Ruston Weaver  
**Subject:** FW: 47 North Comments from Kittitas County Commissioners  
**Attachments:** 1413\_001.pdf

**From:** Mandy Buchholz <Mandy.Buchholz@co.kittitas.wa.us>  
**Sent:** Tuesday, August 24, 2021 9:01 AM  
**To:** Kathi Swanson <kswanson@cleelum.gov>; Jay McGowan <jmcgowan@cleelum.gov>  
**Subject:** 47 North Comments from Kittitas County Commissioners

Good Morning Mayor McGowan,

Please see the attached letter from the Board of County Commissioners, regarding the 47 North Project. I apologize for the delay and hope this finds you well.

Thank you!

### Mandy Buchholz, CMC

Administrative Supervisor | Kittitas County Commissioners Office  
205 West Fifth Ave Suite #108  
Ellensburg, WA 98926  
509-962-7508 (Office)  
509-962-7679 (Fax)  
<http://www.co.kittitas.wa.us/>

**From:** [no\\_reply@co.kittitas.wa.us](mailto:no_reply@co.kittitas.wa.us) <[no\\_reply@co.kittitas.wa.us](mailto:no_reply@co.kittitas.wa.us)>  
**Sent:** Tuesday, August 24, 2021 8:54 AM  
**To:** Mandy Buchholz <[Mandy.Buchholz@co.kittitas.wa.us](mailto:Mandy.Buchholz@co.kittitas.wa.us)>  
**Subject:** Attached Image

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Kittitas County, Washington  
BOARD OF COUNTY COMMISSIONERS

District One  
Cory Wright

District Two  
Laura Osiadacz

District Three  
Brett Wachsmith

August 16, 2021

Mayor Jay McGowan and Council  
City of Cle Elum  
119 West First Street  
Cle Elum, WA 98922

Dear Mayor McGowan and Councilmembers,

We write to you to express our concerns on the 47 Degree North Major Amendment to the existing Suncadia (Trendwest) development agreement of 2002 with the city of Cle Elum.

The existing 2002 development agreement was approved envisioning 1,334 residential units (810 single family/56 multi-family) and a 75-acre business park. The new proposed amendment would change this structure to 527 single-family manufactured units, 180 multi-family residential units, and a reduction of the business park footprint to 26 acres. Additionally, 627 Recreational Vehicle sites are now slated to be part of this development. As planned, the projected population of Cle Elum would double in well under a decade – a massive short-term increase not seen in our county's history since its earliest days. This growth would primarily be on land owned by a single corporate owner from outside of this area.

While this property is governed by a development agreement with the city of Cle Elum, we believe, without significant mitigation, the effects of this development as currently planned will have far-reaching and long-term negative impacts on the Upper County area. Those effects, thus far, have not been adequately presented as part of the forecasting process. Our concerns lie in a variety of county-provided public services which would be significantly stressed and are listed here.

**Transportation:** As planned, the entirety of ingress and egress traffic to the proposed development would take place on the county road network via SR903 and Bullfrog Road. Congestion on both roads is moderate to severe at the present levels of population and travelers. Without mitigation, the combined effects of this additional population growth, along with increased weekend RV travelers, will most certainly add additional traffic that will impact physical road surfaces, but also intersections, adjacent arterials and residential surface streets. This congestion will deteriorate quality of life, economic vitality, and the ability of first responders to mobilize as required. With the project's proposed full seven-year buildout and per-unit *pro rata* cost allocation, failure to require the developer to provide concurrent improvements has the potential to gridlock this area and the greater 903/Bullfrog corridors until funding, permitting, and construction are completed by local government entities at a future date.

In review of the Supplementary Environmental Impact Statement (SEIS), we cannot find information showing the developer would expand the existing road network to accommodate this increased congestion. We believe that, should the City approve this amendment, the project should be served by a Cle Elum-centered access with a primary transportation corridor away from the Bullfrog/SR903 system.



**Public Safety:**

Please find enclosed a letter from Kittitas County Sheriff Clay Myers. As the county's elected official in charge of law enforcement, we support the sheriff's perspectives on this project and urge you to incorporate them into your decision on this matter.

**Revenue:** The Draft SEIS Fiscal Memo (Appendix K) focuses on City of Cle Elum services affected by the proposed project but does not fully encompass the larger impact this project will have on the fair contribution of property taxes paid by county residents. No direct analysis of public services provided by Kittitas County, inclusive of transportation and public safety (Sheriff's Office) is undertaken. Moreover, the graph illustrated on page 29 shows New Construction Assessed Value (NCAV) to be about \$200 million under the proposed project at the end of the buildout in 2028. This stands in stark juxtaposition to the \$1.3 billion realized over the anticipated thirty-year buildout of the project envisioned under the original development agreement. Most alarming, the document indicates the NCAV of the proposed 47 North project will be half of the original project's NCAV in 2028 at the end of buildout – an untenable revenue deficit just as maximum impacts are realized. No additional information regarding this situation was available in the Final SEIS. We believe the potential to unfairly burden our remaining property owners in the county with the costs of improvements necessary requires this project be examined on a much wider scale than anticipated by the SEIS.

After review of this project, we respectfully request that the City of Cle Elum condition this proposal to fully mitigate the impacts as discussed. This includes:

- Full funding by the applicant of necessary road improvements or alteration of proposed access/egress to only the Cle Elum city center
- Required concurrent improvement of transportation network elements and supplementation of public safety entities affected by this proposal on a greater Upper County scale
- Adjust the project's proposed residential/business park allocation to offset the loss of NCAV and associated ongoing property tax collection outlined in the SEIS Fiscal Memo and ensure property owners outside of this project are not disproportionately burdened with the costs of mitigation.

Should these conditions not be feasible, we request that the amendment be denied, and the original approved development agreement remain as the guiding document for this area.

We understand the nature of this letter regarding a specific project is highly unusual, but we believe the effects of this project under the current proposal require formal correspondence. Without due consideration, our concerns over these potential impacts will most certainly be realized on a scale far beyond the project. We appreciate your consideration of our requests and believe you will make your decision with a perspective not only on the future of Cle Elum, but also of the entire Upper County.

Sincerely,



Brett Wachsmith  
Chair

Laura Osiadacz  
Vice-Chair



Cory Wright  
Commissioner

Enclosure: Letter from Kittitas County Sheriff Clay Myers

**Kathi Swanson**

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**From:** Rhonda C. Holden <rholden@kvhealthcare.org>  
**Sent:** Tuesday, August 24, 2021 10:41 AM  
**To:** Planning; Jay McGowan; John Glondo; kratliff@cleelum.com; Beth Williams; Mickey Holz; Steven Harper; Matthew Lundh; Ruston Weaver  
**Subject:** 47 Degrees North  
**Attachments:** 47 North Opposition RHolden.pdf

Please see my attached letter, which represents my personal opinions and not necessarily the opinions of KVH or Hospital District #2.

Thank you,

Rhonda

Rhonda Holden, MSN CENP  
Chief Ancillary Officer  
Kittitas Valley Healthcare  
Ellensburg, WA  
(509)962-7320

Roslyn Downtown Association  
PO Box 546  
Roslyn, WA 98941



September 10, 2021

City of Cle Elum  
Attn: Planning Department/47 Degrees North  
119 West First Street  
Cle Elum, WA 98922

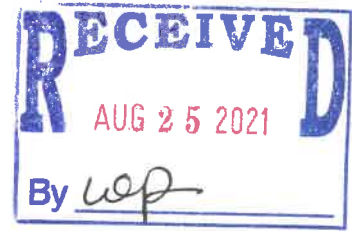
Dear Planning Department,

The proposal submitted to the City of Cle Elum from 47 Degrees North Development will significantly impact the mountain character and the surrounding rural communities including Roslyn, Town of South Cle Elum, and the Kittitas County region. We recognize and support the concerns of the citizens and communities. On behalf of the Roslyn Downtown Association Board, we ask that the current land use application be placed on hold until the proposed development agreement is submitted for municipalities and public review and comment.

Sincerely,

A handwritten signature in cursive script that reads "Cheri Marusa".

Cheri Marusa  
President



To the Honorable Mayor Jay McGowan, Cle Elum City Council and Cle Elum City Planning Department

RE: Project PMU-2021-01- 47 Degrees North Proposed Major Modification

8/17/21

Having reviewed the application of 47 Degrees North we are astutely aware that this is, indeed, a major modification to the Master Site Plan approved by the Cle Elum City Council in 2002. We have concerns on how this major modification will affect Upper Kittitas County and specifically, Hospital District #2 which owns and operates Upper Kittitas County Medic One (Medic One). As the only Advanced Cardiac Life Support ambulance service in Upper County, Medic One is an essential service in our community.

The original approved plan called for 1334 residential units, which would contribute an adequate property tax base to support the expansion of Upper Kittitas County Medic One that would be required by the additional homes, business park, apartments and other improvements in the original plan. The 673 manufactured homes and 661 RV sites that are proposed in the new plan will not provide such a tax base to support the operations of Medic One. As manufactured homes, the land will be owned by Sun Communities and the manufactured home will be subject to a sales tax at the time of purchase, rather than property taxes. In addition, these manufactured homes will sell for \$150,000-\$250,000 per unit rather than current market value of a residential home, which will not support the necessary infrastructure for the resort community, Cle Elum, Roslyn and the surrounding area. We are acutely aware that that our communities need integrated affordable housing, not low income housing. We do not feel this plan offers integrated affordable housing, given that the home owner will not own the land and will have to "rent" the land at an expense of \$650-900 per month (per Sun Communities). Only 50 units are designated as affordable housing, which their leadership has stated they do not plan to build, but make available to another developer.

We are also concerned about the traffic on Bullfrog Road and do not think that expansion to a four lane road or installing a round about will adequately address the impact of folks traveling to the 661 RV sites. This area is currently highly congested and I-90 is frequently stopped traffic on the weekends, making it extremely difficult for Medic One to get to the scene of an accident. A more appropriate option for the

505 Power Street  
Cle Elum, WA 98922  
509.674.4057



entrance would be in Cle Elum near the Cemetery or Washington State Horse Park- truly integrating 47 Degrees North into the City of Cle Elum.

Hospital District #2 is not the only essential service that will be impacted by this proposed major modification. These changes will affect our schools, fire, police, medical services and roads. We feel it is essential that these proposed project modifications be denied.

Respectfully submitted,

Kittitas County Public Hospital District #2 Commissioners  
Floyd Rogalski, President

505 Power Street  
Cle Elum, WA 98922  
509.674.4057





August 25, 2021

City of Cle Elum  
Attn: Planning Department/47 Degrees North  
119 W. First Street  
Cle Elum, WA 98922

Re: 47 Degrees North Development Application

Dear City Officials:

The Washington State Horse Park ("WSHP") is a 501c3 charitable organization whose purpose is to develop and operate a first class venue serving the needs of all horse sports in Washington. As such, we are neutral with respect to supporting the overall 47 Degrees North development plan. However, we must make public comment on several aspects of the proposed site plan that would significantly impact the Park's operations:

1. Safe and functional equestrian trail access.

We respect the fact that change is inevitable, and that Suncadia has a legal right to sell its Bullfrog Flats property and that the buyer(s) has(have) a right to develop it. However, the proposed site plan virtually eliminates all of the existing equine trail system. These trails are heavily used for competitions and recreational riding. Trail activities are critical components of the Park's operations and preserving the ability to safely ride in a natural setting is essential to our long term competitive viability. Therefore, we want the City to recognize our vital interest in preserving the 75 acre reserve/green space parcel adjacent to the Park's western boundary in its native, undeveloped state.

We also look forward to understanding whether or how equestrian use can be incorporated into designated "trails" on the site plan.

2. 8 Acre Parcel

The site plan designates Affordable Housing in the 8 acre parcel adjacent to the northeast corner of the Horse Park. This parcel is right next to the Park's maintenance and livestock holding pen areas which are characterized by noise, smell, dust, flies and activity at all hours. It is also next to the new covered arena which will be used frequently and accompanied by lights, PA system, horses and



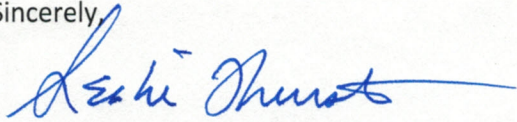
vehicle traffic. Putting housing in this location is incompatible with these conditions and the impacts they would have on the residents' quality of life.

3. Safe Use of Courses in the Managed Open Space ("MOS")

Two Public Trail Parks are indicated in the MOS to the west and a third one is indicated adjacent to the slope road the WSHP constructed to connect the Park property to the MOS land it uses for trails and competitions. WSHP has a perpetual license to use the MOS up to five multi-day periods each year for competitions, camps, clinics, etc. It is imperative WSHP has the right to restrict public access to this area during those use periods for the safety of pedestrians, riders and horses alike.

As we commented previously, we believe there is sufficient land not designated for development that can meet the needs of horseback riders as well as other users, and we welcome the opportunity to work with the applicant to create safe, functional space that continues to attract and serve the large and growing community of WSHP users.

Sincerely,



Leslie Thurston  
Executive Director  
On behalf of the Washington State Horse Park Authority

Authority Board Members:

Maria Danieli  
Mark Englizian  
Representative Tom Dent  
Jessica Logan  
Michelle Pease-Paulson  
Todd Trewin  
Senator Judy Warnick  
Kim Witty  
Mitch Williams  
Denise Youell

## Meagan Hayes

---

**From:** Candie Leader <candie.leader@co.kittitas.wa.us>  
**Sent:** Wednesday, August 25, 2021 1:57 PM  
**To:** Planning  
**Cc:** Mark Cook; Josh Fredrickson  
**Subject:** 47 Degrees North Project - Comments from Kittitas County Department of Public Works  
**Attachments:** SKM\_C654e21082514180.pdf

Good afternoon,

Please find attached comments regarding the 47 Degrees North Project from Kittitas County Department of Public Works.

A hard copy will follow via USPS.

Feel free to contact our office with any questions.

Thank you,

*Candie Leader*

Administrative Supervisor  
Kittitas County Public Works  
411 North Ruby Street, Suite 1  
Ellensburg, WA 98926  
Direct Line: 509-962-7699  
Office Line: 509-962-7523

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## Meagan Hayes

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**From:** ECY RE CRO SEPA Coordinator <crosepa@ecy.wa.gov>  
**Sent:** Wednesday, August 25, 2021 3:24 PM  
**To:** Planning  
**Subject:** 202104470 Comments for the Major Modification for the Bullfrog Master Site Plan  
**Attachments:** 202104470 The Atwell Group.pdf  
  
**Importance:** High

Please see the attached comment letter for the Major Modification for the Bullfrog Master Site Plan.

Please share these comments with the applicant.  
Thank you

Gwen Clear  
WA State Dept. of Ecology  
Regional Environmental Review Coordinator  
1250 W. Alder Street  
Union Gap, WA 98903-0009  
(509) 575-2012  
[crosepa@ecy.wa.gov](mailto:crosepa@ecy.wa.gov)



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Deloa Dalby, Savor Snoqualmie Valley Leadership Team;  
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Bob Ellis, Lifetime Educator and Cyclist,  
Karl Forsgaard, Manager of Implementations, Thomson Reuters;  
Alpine Lakes Protection Society  
Kurt Fraese (\*), Fraese and Associates, LLC  
Hilary Franz (X), Commissioner of Public Lands, WA State Dept. of  
Natural Resources  
Matt Grimm, Investment Professional, BMGI  
Don Hoch (X), Director, WA State Parks & Recreation Commission  
Laura Hoffman, Owner, Copper Ridge Farm; Microsoft  
Warren Jimenez (X), Director, King County Parks  
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Pacific Groundwater Group  
Ken Konigsmark, Issaquah Alps Trails Club  
Yvonne Kraus, Executive Director, Evergreen Mountain Bike Alliance  
Danny Levine, Retired, President, NationAd Communications  
Sharon Linton (\*), Marketing Consultant, SL Connects  
Elizabeth Lunney (\*), Former Mountains to Sound Greenway Trust  
Interim Executive Director  
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Ben Mayer, Associate, K&L Gates  
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Recreation Commission  
Roger Millar (X), Secretary of Transportation, WSDOT  
Chad Nesland, Director, Microsoft Procurement, Microsoft  
Thomas O'Keefe, Pacific Northwest Stewardship Director,  
American Whitewater  
Amanda O'Rourke, CPA, Partner, Greenwood Ohlund & Co.  
David Patton, Northwest Area Director, The Trust for Public Land  
Kizz Prusia, Project Associate, Triangle Associates  
Charles Raines, Director Cascade Checkerboard Project, Sierra Club,  
Washington State Chapter  
Janet Ray, Retired, Asst VP, Corporate Affairs and Publishing,  
AAA Washington  
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Meredith Shank, Social Venture Partners  
Steve Shesteg, Director, Environmental Sustainability,  
The Boeing Company  
Jill Simmons, Executive Director, Washington Trails Association  
Al Smith, Partner, Perkins Coie LLP  
David Sturtevant, Retired, Vice President CH2M HILL  
Chris Thomas, Senior Director, Public Policy, Lyft  
Harry Thomas, Chief Marketing Officer, AAA Washington  
Leah Tivoli, Manager, City of Seattle  
Adam Torem, Industrial Insurance Appeals Judge,  
Board of Industrial Insurance Appeals  
Alison Washburn, Bellevue Store Manager, REI Co-op  
Jody Weil (X), Supervisor, Mt. Baker-Snoqualmie National Forest

(\*) Executive Committee Member  
(X) Ex-Officio (non-voting) Director

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Doug McClelland (\*), Former Assistant Region Manager  
Washington State Department of Natural Resources

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Executive Director  
Jon Hoekstra (\*), Mountains to Sound Greenway Trust

September 8, 2021

Honorable Mayor Jay McGowan and Council  
City of Cle Elum  
119 West First St.  
Cle Elum, WA 98922

Dear Mayor McGowan and Councilmembers,

I write to you today as a representative of the Mountains to Sound Greenway Trust, a nonprofit that works to connect our local communities with the outdoors. We have collaborated with residents, businesses, government staff, and land management agencies since 1990 to implement projects like the Wye Park, Flagpole Park, Coal Mines Trail, Towns to Teanaway, and the Teanaway Community Forest. We would like to share thoughts and concerns regarding the City of Cle Elum's development agreement with Suncadia (Trendwest), and the recent major amendments proposed by Sun Communities, known as the 47 Degrees North Development.

The changes requested by Sun Communities within the recently-completed Supplemental Environmental Impact Statement include:

- Installing 707 manufactured residential units onsite. The key difference here is that, under Sun Communities' new proposal, the proponent will retain ownership of the land and rent the units. [This model has been shown to depreciate in value](#), instead of allowing community members to purchase property, build equity, and invest in their communities;
- Creating a new 627 site RV resort which, if completed, will be largest of its kind in Washington state. While the RV park boasts amenities for its guests, they will only be available to the community at large on a fee-rate basis;
- Removing the approved 25-acre business park from the development plan, leaving implementation and ownership under Trendwest. The development timeline of that parcel has yet to be determined;

Other local entities and residents have spoken eloquently on the potentially detrimental impacts to roads, emergency response systems, and local vitality. Although this project may double the size of Cle Elum's population, Sun Communities commits only to a share fee contribution instead of outright mitigation. Such an arrangement would place a great deal of the cost and burden on the leadership, public servants, and taxpayers of the upper county.

The Greenway Trust encourages the City and its officers to also consider the





increased stress and impact on Upper Kittitas County's natural resources and recreational amenities. In recent years, our communities have become more cognizant of the value of these resources, both to our physical and mental health, and to our local economies as we transition from timber and coal. The [2020 Economic Analysis of Recreation in Washington State](#) found that outdoor recreation generated \$305,936,000 annually in Kittitas County (up from \$185,325,000 in 2015), supporting more than 1,600 jobs.

However, the sharp spike in recreation numbers during the COVID-19 pandemic demonstrated how our public lands can be loved to death; trails were trampled, trailheads and parking lots overflowed, and refuse abounded. In 2019-2021, the Greenway Trust worked (and continues to work) ceaselessly alongside the US Forest Service, WA Depts. of Natural Resources and Fish and Wildlife, and WA State Parks to respond to sanitation needs, increased risk of man-made fires, injurious accidents, and deteriorating and unsafe trail conditions caused by unprecedented wear and tear. Kittitas County's natural resources are a regional draw and a treasured part of our communities' character, but they must be stewarded sustainably. We are concerned that the plan proposed by Sun Communities does not acknowledge such impacts, or provide the means to mitigate them.

After reviewing the Supplementary Environmental Impact statement, we respectfully request that the City of Cle Elum exercise its powers to condition acceptance of this proposal by:

- Requiring the developer submit a plan for connecting paths and trails within the development area to existing networks, at the developer's own cost;
- Requiring the developer fund permitting and construction of expanded/improved trailhead facilities within the communities of Cle Elum and Roslyn;
- Establishing a percentage of the RV Rental fees be designated for maintenance of paths, trails, and other facilities;
- Including a buffer of native vegetation along Bullfrog Road, as Suncadia was required to do, to obscure view of the development and maintain community character;
- Otherwise condition the developer for funding, constructing, and long-term maintenance of any infrastructure needed to support the project.

If these conditions are not feasible, we hope you will consider denying the amended proposal, and returning to the approved 2002 development agreement.



The 47 Degrees North project represents the largest development in the city of Cle Elum's history. The Greenway Trust was founded in 1990 under somewhat similar circumstances: rapid growth in Seattle-adjacent communities cutting off access to the outdoors and stirring up citizen concerns about their quality of life and availability of public services. We have seen the dividends of thoughtful and well-planned development, as well as the impacts of hurried construction. A forest, once trampled, is not restored without great expenditures of funds, effort, and will.

I hope that you find this perspective helpful as you consider the path forward for Cle Elum and Upper Kittitas County.

Sincerely,

A handwritten signature in black ink that reads "Nicky Pasi". The signature is fluid and cursive, with a large loop at the end of the last name.

Nicky Pasi  
Upper Yakima Basin Community Coordinator  
Mountains to Sound Greenway Trust

cc: Kittitas County, Board of County Commissioners  
Kittitas County Sheriff's Office  
Kittitas County Public Works  
City of Roslyn  
City of South Cle Elum  
Cle Elum-Roslyn School District  
WA Outdoor School  
Cle Elum Downtown Association



## KITTITAS COUNTY DEPARTMENT OF PUBLIC WORKS

Mark R. Cook, PE Director



August 25, 2021

City of Cle Elum  
Attention Planning Department/47 Degrees North  
119 West First Street  
Cle Elum, WA 98922

Dear Planning Department:

Thank you for the opportunity discussing the Major Modification of the Master Site Plan and Development Agreement for the 47 Degrees North development proposal. Please accept our comments from Kittitas County Department of Public Works listed below for your consideration.

1. The transportation analysis completed for 47 Degrees North (TENW, September 2020) contemplates 627 RV sites. The request from Sun Communities (Version 11 July 19, 2021) references a maximum number of 700 units. The "Proposed Major Modification" dated August 10, 2021, states that up to 661 RVs are being considered. The discrepancy is discerning because of our current RV experience on Bullfrog Road during the weekend. The growing adverse impacts resulting from Utility Terrain Vehicles (UTV) are increasingly stressing county resources.
2. During initial scoping of 47 Degrees North traffic impacts (supplemental FEIS), we expressed our desire limiting new access points along Bullfrog Road. We are concerned with the "secondary emergency entry" depicted on sheet C102 of ATWELL's plan set obtained from the City's website. We desire eliminating this proposed access and favor interconnection of the RV network with the residential component to the north. The interconnection will provide the desired "secondary" emergency exit for the development without further impacts to Bullfrog Road. Our requested Mainline connecting Bullfrog Road with State Route 903 appears to have been discarded in favor of multiple access locations on Bullfrog Road.
3. Kittitas County Department of Public Works has spent the past two years studying traffic congestion issues associated with bypassing Interstate 90 traffic in Upper County. That work has also informed us about the significant recreational traffic utilizing Bullfrog Road and SR 903. We understand that recreational demand peaks on the weekends with Sunday traffic typically being the worse in the week. Owing to the nature of RV travel demand, the impacts of the RV segment on weekend traffic are anticipated to exceed those of the residential unit proposal contained in the current Master Site Plan.
4. Public Works notes with interest that the original Master Site Plan contained no supermarket, retail, restaurant or medical office – all uses now being requested by the applicant. Of most concern is the request to alleviate conditional use consideration for all



- “uses” proposed in the Master Site Plan. Our preference is to maintain the need for conditional use permits so that we can assess specific impacts to our road network associated with more intense use than the existing “business park”.
5. The forecast level of service decline on Interstate 90 ramps and at the Tumble Creek entrance to Bullfrog Road suggest capacity issues are to be expected in the Bullfrog Road segment (ramps to Tumble Creek). Widening as a mechanism to create additional volume capacity in the segment will have to include considerations on the County’s bridge over the Cle Elum River. Segment widening does not appear to be fully considered in the impacts identified for the SEIS Alt 6 proposal.
  6. Traffic impacts are forecast to intensify with SEIS Alt 6. Our experience suggests to us that the RV component will generate traffic impacts less desirable than the current residential use impact. Additionally, the request for supermarket, retail, and restaurant along with medical office will further stress the area during weekends. The existing residential use contained in the current Master Site Plan proposal is a less intensive impact to the County Road network.
  7. The intensified land uses being requested by the applicant (SEIS Alt 6) are expected to have similarly impactful affect on the proposed entrance at State Highway 903.
  8. Recreational demand in Upper County is currently creating a host of management issues for Public Works. The significant RV proposal is expected to result in undesirable travel conditions for Bullfrog Road users and is not simply limited to Bullfrog Road impact. The RV component will have impact issues for our maintenance operations on Salmon La Sac Road and Fish Lake Road. Growing Utility Terrain Vehicle traffic is increasingly creating challenges for road maintenance and this user group is expected to occupy a large number of RV sites – adding to our existing road conflict with UTV users.

Public Works enjoys a rewarding relationship with the City of Cle Elum, and we are proud to partner with the City wherever possible. We appreciate the challenges the City faces with the 47 Degree North proposal. While a level of road system impact has always been anticipated with area buildout, the intensified land uses being requested may not be able to fully mitigate regional impacts already being experienced by recreational demand from the westside. Attracting more RV use demand without fully understanding regional impacts to area campgrounds and resource lands, may adversely impact interests of federal, state and County land managers.

Sincerely,



Mark R. Cook  
Director



**Confederated Tribes and Bands of the Yakama Nation**  
**Established by the Treaty of June 9, 1855**

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Post Office Box 151  
Toppenish Washington 98948

Planning Department  
City of Cle Elum  
119 W First Street  
Cle Elum, WA 98922

August 16, 2021

**Subject: Bullfrog UGA Master Site Plan and Development Agreement Notice of Application Proposed Major Modification, Sun Communities 47 Degree North**

Thank you for contacting the Yakama Nation Cultural Resource Program (CRP) regarding the Bullfrog UGA Master Site Plan and Development Agreement Notice of Application Proposed Major Modification, Sun Communities 47 Degree North in Kittitas County. The project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855 (12 Stat. 951), between the Yakama Nation and the United States Government. The Treaty set forth that the Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources.

Yakama Nation CRP previously submitted comments with regards to the draft EIS and archaeological report. The report was amended but did not satisfy concerns as the archaeological survey was inadequate to identify resources. Large areas of the proposed development were not surveyed for cultural resources. Yakama Nation CRP submitted formal comments on April 30, 2021 stating we found the *"SEIS deficient in addressing the cumulative effects and impact the undertaking will have on cultural sites"*. We recommended our concerns be remedied in the EIS process or condition the Record of Decision, however we have not received a formal response to these comments. As stated in the April 30, 2021 letter, the agreement should be conditioned with the following:

- The area designated as 'future commercial space' will require cultural resources investigation.
- The 'river corridor open space' will require cultural resource investigation as it was not surveyed as part of the SEIS.
- The 'managed open space' will require additional cultural resource investigations as known archaeological sites were not revisited and the area was not entirely covered due to the methods employed.
- Sites not revisited within the project area will require additional cultural resource investigations (i.e. 45KT3332, 45KT1019, 45KT1376, 45KT1368, 45KT1484, 45KT1227). The proponent will need to engage directly with the Yakama Nation Cultural Resources Program to address cultural resource concerns in this area.

- Future actions within 'future commercial space', 'river corridor open space', and 'managed open space' may require additional work as requested by the Yakama Nation Cultural Resources Program during and permitting may be conditioned pursuant to this request.

We request a formal response to our comments above. Please contact me or staff archaeologists if you have any questions regarding the above.

Sincerely,

A handwritten signature in black ink that reads "Casey Barney". The script is cursive and fluid.

Casey Barney  
Cultural Resources Program Manager  
Yakama Nation  
509-865-5121 ext. 4378





Confederated Tribes and Bands of the Yakama Nation  
Established by the Treaty of June 9, 1855

Post Office Box 151  
Toppenish Washington 98948

Lucy Temple  
City of Cle Elum  
119 W First Street  
Cle Elum, WA 98922

April 28, 2021

Subject: Final SEIS 47 Degrees North Project, Kittitas County

Dear Ms. Temple,

Thank you for contacting the Yakama Nation Cultural Resource Program (CRP) regarding the Final Supplemental Environmental Impact Statement (SEIS) for the 47 Degrees North Project in Kittitas County. The project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855 (12 Stat. 951), between the Yakama Nation and the United States Government. The Treaty set forth that the Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources.

We have reviewed the Final SEIS and find that previously identified concerns with the proper treatment of cultural resources in the ancestral lands of the Yakama Nation have not occurred. We provided comments during the review of the Draft SEIS identifying issues with methodology and mitigation options. While some of our previous comments were addressed in the report, there are still outstanding issues.

The report states *"This survey did not include the boundary delineation or evaluative testing of previously known archaeological sites."* Without identifying the vertical and horizontal extent of the resources the evaluation is not complete. Therefore the true extent of resources remains unknown and may be impacted by the proposed project. Some resources (i.e. 45KT2139, 45KT2098, 45KT2141, 45KT3331, 45KT2146, 45KT1227, 45KT2096, 45KT2092) were re-visited while others (i.e. 45KT3332, 45KT1019, 45KT1376, 45KT1368, 45KT1484) were not (including those which have not been visited for over two decades). Some sites within the open space were visited while others were not. None of the precontact sites were relocated or tested. The authors indicate meandering transects were used to target mineral soil visibility. However, this left large swaths of areas unsurveyed. In areas where visibility was poor, subsurface testing should have been utilized as a means to investigate the potential for cultural materials. Therefore, we find that a lack of understanding and logic to the methods employed remain (as we previously indicated in October of 2020). It appears that the contractor did not have site data when conducting the survey to relocate sites (as is evident in 45KT1376 surveyed but not revisited). Without visiting the site (survey records indicate they did not get close to many of the sites) or conducting the testing necessary to identify or relocate pre contact sites in the forested environment, the contractor simply is not finished. Additional work rather than justifications are needed.

It is important that the survey report is representative of areas actually surveyed otherwise it places cultural resources – the physical witnesses to the ancestral use areas of the Yakama – at jeopardy in the event future activities inadvertently disturb/destroy them. There are previously documented burials in the project area. If cultural sites are damaged, the proponent would face the consequences defined under the State Law. Furthermore, Yakama Nation considers burials to be sacred. The individuals and practice that occurred at the time and place of their ceremonial burial cannot be repeated. The protection of these resources preserves this ceremony that helps them to find their way in the next phase of life in a good way. The consequences of damaging these ancestral burials would impact the entire Yakama Nation.

The cultural resources report is considered incomplete as it excluded large areas for survey within the project, and neglected to address site extent within the project area. The original EIS was outdated, being conducted approximately twenty years ago, and therefore the SEIS should have been conducted in compliance with present-day standards for archaeological inventory. Due to the above concerns, we find the SEIS deficient in addressing the impacts the project will have on cultural sites. The above should be remedied in the EIS prior to the completion of the SEPA process:

- The area designated as 'future commercial space' will require cultural resources investigation.
- The 'river corridor open space' will require cultural resource investigation as it was not surveyed as part of the SEIS.
- The 'managed open space' will require additional cultural resource investigations as known archaeological sites were not revisited and the area was not entirely covered due to the methods employed.
- Sites not revisited within the project area will require additional cultural resource investigations (i.e. 45KT3332, 45KT1019, 45KT1376, 45KT1368, 45KT1484, 45KT1227). The City of Cle Elum will need to engage directly with the Yakama Nation Cultural Resources Program to address cultural resource concerns in this area.
- Future actions within 'future commercial space', 'river corridor open space', and 'managed open space' may require additional work to satisfy permitting requirements through consultation.

We look to the City of Cle Elum to engage with the Yakama Nation Cultural Resources Program. Hired consultants either by the City of Cle Elum or sub-contracted do not replace the important role that the City of Cle Elum has to consult with Yakama Nation. While we appreciate the consultant's efforts in the consultation process, we request that the City of Cle Elum work directly with Yakama Nation moving forward.

Please contact me directly at 509-865-5121 ext. 4378 or reach Noah Oliver 509-865-5121 ext. 4726, by e-mail to [noah\\_oliver@yakama.com](mailto:noah_oliver@yakama.com) to address the above. We look forward to working with you to resolve these issues.

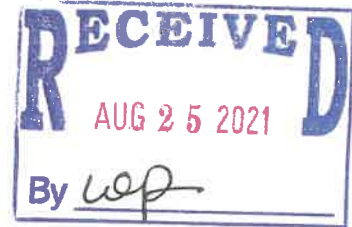
Sincerely,



Casey Barney  
Cultural Resources Program Manager  
Yakama Nation

Cc:

George Selam, Yakama Nation Tribal Council  
Jerry Meninick, Yakama Nation Director of Cultural Services  
Shona Volkers, Yakama Nation Office of Legal Council  
Sydney Hanson, Washington State Department of Archaeology and Historic Preservation  
Dennis Wardlaw, Washington State Department of Archaeology and Historic Preservation



To the Honorable Mayor Jay McGowan, Cle Elum City Council and Cle Elum City Planning Department

RE: Project PMU-2021-01- 47 Degrees North Proposed Major Modification

8/17/21

Having reviewed the application of 47 Degrees North we are astutely aware that this is, indeed, a major modification to the Master Site Plan approved by the Cle Elum City Council in 2002. We have concerns on how this major modification will affect Upper Kittitas County and specifically, Hospital District #2 which owns and operates Upper Kittitas County Medic One (Medic One). As the only Advanced Cardiac Life Support ambulance service in Upper County, Medic One is an essential service in our community.

The original approved plan called for 1334 residential units, which would contribute an adequate property tax base to support the expansion of Upper Kittitas County Medic One that would be required by the additional homes, business park, apartments and other improvements in the original plan. The 673 manufactured homes and 661 RV sites that are proposed in the new plan will not provide such a tax base to support the operations of Medic One. As manufactured homes, the land will be owned by Sun Communities and the manufactured home will be subject to a sales tax at the time of purchase, rather than property taxes. In addition, these manufactured homes will sell for \$150,000-\$250,000 per unit rather than current market value of a residential home, which will not support the necessary infrastructure for the resort community, Cle Elum, Roslyn and the surrounding area. We are acutely aware that that our communities need integrated affordable housing, not low income housing. We do not feel this plan offers integrated affordable housing, given that the home owner will not own the land and will have to "rent" the land at an expense of \$650-900 per month (per Sun Communities). Only 50 units are designated as affordable housing, which their leadership has stated they do not plan to build, but make available to another developer.

We are also concerned about the traffic on Bullfrog Road and do not think that expansion to a four lane road or installing a round about will adequately address the impact of folks traveling to the 661 RV sites. This area is currently highly congested and I-90 is frequently stopped traffic on the weekends, making it extremely difficult for Medic One to get to the scene of an accident. A more appropriate option for the

505 Power Street  
Cle Elum, WA 98922  
509.674.4057



entrance would be in Cle Elum near the Cemetery or Washington State Horse Park- truly integrating 47 Degrees North into the City of Cle Elum.

Hospital District #2 is not the only essential service that will be impacted by this proposed major modification. These changes will affect our schools, fire, police, medical services and roads. We feel it is essential that these proposed project modifications be denied.

Respectfully submitted,

*Floyd Rogalski, President*

Kittitas County Public Hospital District #2 Commissioners  
Floyd Rogalski, President

505 Power Street  
Cle Elum, WA 98922  
509.674.4057

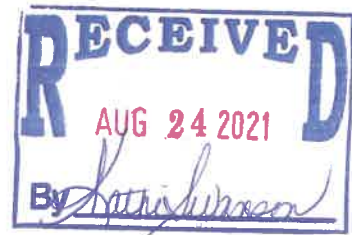


Kittitas County, Washington  
BOARD OF COUNTY COMMISSIONERS

District One  
Cory Wright

District Two  
Laura Osiadacz

District Three  
Brett Wachsmith



August 16, 2021

Mayor Jay McGowan and Council  
City of Cle Elum  
119 West First Street  
Cle Elum, WA 98922

Dear Mayor McGowan and Councilmembers,

We write to you to express our concerns on the 47 Degree North Major Amendment to the existing Suncadia (Trendwest) development agreement of 2002 with the city of Cle Elum.

The existing 2002 development agreement was approved envisioning 1,334 residential units (810 single family/56 multi-family) and a 75-acre business park. The new proposed amendment would change this structure to 527 single-family manufactured units, 180 multi-family residential units, and a reduction of the business park footprint to 26 acres. Additionally, 627 Recreational Vehicle sites are now slated to be part of this development. As planned, the projected population of Cle Elum would double in well under a decade – a massive short-term increase not seen in our county's history since its earliest days. This growth would primarily be on land owned by a single corporate owner from outside of this area.

While this property is governed by a development agreement with the city of Cle Elum, we believe, without significant mitigation, the effects of this development as currently planned will have far-reaching and long-term negative impacts on the Upper County area. Those effects, thus far, have not been adequately presented as part of the forecasting process. Our concerns lie in a variety of county-provided public services which would be significantly stressed and are listed here.

**Transportation:** As planned, the entirety of ingress and egress traffic to the proposed development would take place on the county road network via SR903 and Bullfrog Road. Congestion on both roads is moderate to severe at the present levels of population and travelers. Without mitigation, the combined effects of this additional population growth, along with increased weekend RV travelers, will most certainly add additional traffic that will impact physical road surfaces, but also intersections, adjacent arterials and residential surface streets. This congestion will deteriorate quality of life, economic vitality, and the ability of first responders to mobilize as required. With the project's proposed full seven-year buildout and per-unit *pro rata* cost allocation, failure to require the developer to provide concurrent improvements has the potential to gridlock this area and the greater 903/Bullfrog corridors until funding, permitting, and construction are completed by local government entities at a future date.

In review of the Supplementary Environmental Impact Statement (SEIS), we cannot find information showing the developer would expand the existing road network to accommodate this increased congestion. We believe that, should the City approve this amendment, the project should be served by a Cle Elum-centered access with a primary transportation corridor away from the Bullfrog/SR903 system.



**Public Safety:**

Please find enclosed a letter from Kittitas County Sheriff Clay Myers. As the county's elected official in charge of law enforcement, we support the sheriff's perspectives on this project and urge you to incorporate them into your decision on this matter.

**Revenue:** The Draft SEIS Fiscal Memo (Appendix K) focuses on City of Cle Elum services affected by the proposed project but does not fully encompass the larger impact this project will have on the fair contribution of property taxes paid by county residents. No direct analysis of public services provided by Kittitas County, inclusive of transportation and public safety (Sheriff's Office) is undertaken. Moreover, the graph illustrated on page 29 shows New Construction Assessed Value (NCAV) to be about \$200 million under the proposed project at the end of the buildout in 2028. This stands in stark juxtaposition to the \$1.3 billion realized over the anticipated thirty-year buildout of the project envisioned under the original development agreement. Most alarming, the document indicates the NCAV of the proposed 47 North project will be half of the original project's NCAV in 2028 at the end of buildout – an untenable revenue deficit just as maximum impacts are realized. No additional information regarding this situation was available in the Final SEIS. We believe the potential to unfairly burden our remaining property owners in the county with the costs of improvements necessary requires this project be examined on a much wider scale than anticipated by the SEIS.

After review of this project, we respectfully request that the City of Cle Elum condition this proposal to fully mitigate the impacts as discussed. This includes:

- Full funding by the applicant of necessary road improvements or alteration of proposed access/egress to only the Cle Elum city center
- Required concurrent improvement of transportation network elements and supplementation of public safety entities affected by this proposal on a greater Upper County scale
- Adjust the project's proposed residential/business park allocation to offset the loss of NCAV and associated ongoing property tax collection outlined in the SEIS Fiscal Memo and ensure property owners outside of this project are not disproportionately burdened with the costs of mitigation.

Should these conditions not be feasible, we request that the amendment be denied, and the original approved development agreement remain as the guiding document for this area.

We understand the nature of this letter regarding a specific project is highly unusual, but we believe the effects of this project under the current proposal require formal correspondence. Without due consideration, our concerns over these potential impacts will most certainly be realized on a scale far beyond the project. We appreciate your consideration of our requests and believe you will make your decision with a perspective not only on the future of Cle Elum, but also of the entire Upper County.

Sincerely,



Brett Wachsmith  
Chair



Laura Osiadacz  
Vice-Chair



Cory Wright  
Commissioner

Enclosure: Letter from Kittitas County Sheriff Clay Myers



# CITY OF ROSLYN

National Historic District and Preserve America Community

July 27, 2021

Mayor McGowan  
Cle Elum City Council members  
119 W 1<sup>st</sup> St  
Cle Elum, WA 98922

Dear Mayor McGowan and City Council members:

We are writing to convey our deep concerns regarding the proposed 47 Degree North Major Amendment. We understand that environmental review for this proposal is complete and that it will be coming before you in the near future for a final land use decision.

As we understand it, the proposed major amendment would replace the residential home development originally approved for the site with a large manufactured home community (707 manufactured units) and an RV Resort (627 sites). The environmental reports estimate that if approved as proposed, 1,490 to 1,650 people and 940 to 1,880 RV visitors per day would be added to the upper valley population when the project is full, potentially doubling the population of Cle Elum/South Cle Elum/Roslyn. By itself the project would more than double the size of the City of Cle Elum.

We are specifically concerned with the following issues:

- Traffic congestion on upper county roads and highways, specifically congestion on Roslyn, county and state roads. Based on the environmental reports for the project, all major intersections and associated roads in upper county (SR 903, I-90, Bullfrog Rd) will reach failing levels of service if this project is approved without requiring significant new road expansions.

The environmental reports imply that the developer is not actually proposing to expand any road or intersection to mitigate for the increased traffic from the development. But rather, the developer is apparently proposing to pay a small estimated pro-rata fee to the City of Cle Elum (apparently). Who will fund the remaining costs and complete the actual road projects, which will be extensive? Neither the county, nor the state has any project on its CIP list(s) to address these issues. Will the city take the lead to make sure these projects are funded and timely constructed?

City of Roslyn  
201 S 1<sup>st</sup> St., P.O. Box 451, Roslyn, WA 98941  
PH 509-649-3105, FAX 509-649-3174  
[clerk@ci.roslyn.wa.us](mailto:clerk@ci.roslyn.wa.us)

This is not solely a quality of life issue for Roslyn and upper county residents (although that is important), it is potentially a life safety issue for emergency services response time or if evacuation of the upper county is necessary. Absent more developer funded mitigation it is highly unlikely that projects to relieve the projected road congestion will be built until years after the development is completed, if they are built at all.

- Level of Service for upper county public services. The environmental reports detail that very significant expansions in staff, equipment and facilities will be needed to maintain adequate public service levels in the upper county if this project is approved:
  - Cle Elum-Roslyn School District: 12 new teachers, 4 to 5 new buses, additional classrooms required
  - City of Cle Elum Police Department and service to Roslyn: 6 new officers, new equipment, new station or significant expansion required
  - Hospital Dist. No. 2 (Ellensburg and Cle Elum), Medic 1: 2 new physicians, 5 APC's, 9 RN's, 6 EMT's, 7 paramedics, new equipment and facilities required
  - Kittcom: 1 new dispatcher
  - Kittitas County Solid Waste: Transfer Station expansion

Based on the environmental reports for the project, the developer is not proposing direct financial funding or participation in capital improvements, equipment acquisition, staffing costs to offset the additional costs facing upper county service providers. The reports imply that the project will create an increased tax base to fund needed service improvements but the fiscal analysis in the environmental reports shows that increases in tax base will be far less than what is needed to cover costs of service.

Unless the project is required to provide funding to make up shortfalls, it will be left to upper county service providers to absorb the costs, likely by unacceptably low service standards, or for tax payers to approve new taxes, or a combination of both. Without strong mitigation upper county service providers and Roslyn and upper county taxpayers will be left to subsidize 47 Degrees North. This will have a direct effect on the City of Roslyn as it will make it more difficult to raise taxes for our future needs.

We request that the City:

- Require the developer to fully fund and construct all needed road improvements or have enforceable legal agreements with the County/WSDOT that guarantee improvements will be made concurrent with development.
- Require the developer to make up all Public Service provider funding shortfalls and have enforceable legal agreements with Public Service providers that guarantee needed service expansions will be made concurrent with development.

City of Roslyn  
201 S 1<sup>st</sup> St., P.O. Box 451, Roslyn, WA 98941  
PH 509-649-3105, FAX 509-649-3174  
[clerk@ci.roslyn.wa.us](mailto:clerk@ci.roslyn.wa.us)



- Require the project make up any other funding shortfalls so that there are no financial impacts to Roslyn and upper county residents.
- If adequate financial mitigation cannot be imposed on the development because of legal constraints, or because the developer's business plan cannot accept the full costs of the development, we request that you deny the major amendment and revert back to the existing approval on the site. It should not be the responsibility of upper county residents to subsidize the project, which is primarily, if not entirely, a private business venture.

Unless the 47 Degree North project is properly mitigated it will have far reaching negative impacts, potentially catastrophic, across the upper county affecting service levels, service providers, quality of life and tax base for decades. The City of Cle Elum's decisions in this regard will have wide ranging effects and impacts on the entire upper county. The upper county's fate is literally in the City's hands.

We look forward to discussing this matter further with you and working with you to develop the correct mitigations for this project.

Sincerely,



Brent Hals  
Mayor

## Kathi Swanson

---

**From:** Dan Carlson <dan.carlson@co.kittitas.wa.us>  
**Sent:** Friday, August 20, 2021 1:46 PM  
**To:** Planning  
**Subject:** FW: Bullfrog Master Site Plan and Development Agreement Major Modification

Please provide an update on the status of the request below. The deadline for providing comments on this project is one week from today, and we need to know what criteria the application is being reviewed under in order to provide comments. Please provide this information as soon as possible. Thank you.

### Dan Carlson, AICP

Community Development Services Director  
Kittitas County  
411 N Ruby ST, Suite 2  
Ellensburg WA 98926  
(509) 933-8244  
[dan.carlson@co.kittitas.wa.us](mailto:dan.carlson@co.kittitas.wa.us)

**From:** Dan Carlson  
**Sent:** Monday, August 16, 2021 4:23 PM  
**To:** 'planning@cleelum.gov' <planning@cleelum.gov>  
**Subject:** Bullfrog Master Site Plan and Development Agreement Major Modification

As we discussed on the phone, I have a few questions regarding this project:

1. What criteria are being used to evaluate this application? Are there regulations in code, state law, etc. that apply? Does the approval criteria include the conditions of the original development agreement? If so, can I get a copy of the original development agreement?
2. Will future subdivisions, binding site plans, etc. be subject to a public process where the county will be able to provide comments and mitigating conditions can be applied to potential approvals?

Please let me know. Thank you.

### Dan Carlson, AICP

Community Development Services Director  
Kittitas County  
411 N Ruby ST, Suite 2  
Ellensburg WA 98926  
(509) 933-8244  
[dan.carlson@co.kittitas.wa.us](mailto:dan.carlson@co.kittitas.wa.us)

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message id: 38eb45916c6dcdbdac24bb8719d004a14

**Kathi Swanson**

---

**From:** Dan Carlson <dan.carlson@co.kittitas.wa.us>  
**Sent:** Monday, August 16, 2021 4:23 PM  
**To:** Planning  
**Subject:** Bullfrog Master Site Plan and Development Agreement Major Modification

As we discussed on the phone, I have a few questions regarding this project:

1. What criteria are being used to evaluate this application? Are there regulations in code, state law, etc. that apply? Does the approval criteria include the conditions of the original development agreement? If so, can I get a copy of the original development agreement?
2. Will future subdivisions, binding site plans, etc. be subject to a public process where the county will be able to provide comments and mitigating conditions can be applied to potential approvals?

Please let me know. Thank you.

**Dan Carlson, AICP**  
Community Development Services Director  
Kittitas County  
411 N Ruby ST, Suite 2  
Ellensburg WA 98926  
(509) 933-8244  
[dan.carlson@co.kittitas.wa.us](mailto:dan.carlson@co.kittitas.wa.us)

---

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message id: 38eb45916c6dcdbdac24bb8719d004a14

## Kathi Swanson

---

**From:** Mau, Russell E (DOH) <Russell.Mau@DOH.WA.GOV>  
**Sent:** Friday, August 13, 2021 1:39 PM  
**To:** Kathi Swanson; LaRue, William  
**Cc:** Smits, Brenda M (DOH); DOH EPH DW ERO ADMIN  
**Subject:** RE: 47 Degrees North Notice of Application; CLE ELUM WATER DEPARTMENT, 13500V, Kittitas County

Ms. Swanson and Mr. LaRue:

DOH appreciates being provided the Notice. We have reviewed and have some questions or comments:

- If this development is to be served by the City's water system (treatment and distribution), it would be a significant increase in water usage because of the approximately 1,400 new connections (that may be more depending on the development of the 75-acre business park).
- At this time, the City's Water System Plan was approved in 2015 and did show capacity to serve an additional 2,458 available connections. However, at that time, the Suncadia connection was identified as using 1,118 connections' of water, and Suncadia has and continues to grow in terms of connections and water demand.
- The 2015 Water System Plan also identified 1,381 active connections, but current DOH records show 1,377 active connections – has the City lost connections over the past 6 years?
- Finally, DOH feels a review of connections and capacity may be warranted to fully account for the activities in Suncadia and for projecting water usage by this new development.

DOH looks forward to your response(s).

Thanks,

**Russell E. Mau, PhD, PE**

Regional Engineer  
Office of Drinking Water  
Washington State Department of Health  
16201 East Indiana Avenue, Suite 1500, Spokane Valley, WA 99216  
[Russell.Mau@doh.wa.gov](mailto:Russell.Mau@doh.wa.gov)  
509-329-2116 | [www.doh.wa.gov](http://www.doh.wa.gov)

**From:** Kathi Swanson <kswanson@cleelum.gov>  
**Sent:** Friday, August 13, 2021 12:05 PM  
**To:** Kathi Swanson <kswanson@cleelum.gov>  
**Subject:** 47 Degrees North Notice of Application

---

External Email

---

Please see the attached Notice of Application for the Sun Communities Major Modification, 47 degrees North. Information regarding questions that you may have are included within the Notice.

Kathi Swanson

## Kathi Swanson

---

**From:** SEPA (DAHP) <sepa@dahp.wa.gov>  
**Sent:** Tuesday, August 31, 2021 2:20 PM  
**To:** Kathi Swanson  
**Cc:** 'Guy Moura (HSY)'; 'Aren Orsen (HSY)'; 'steve@snoqualmtribe.us'; Casey Barney; Corrine Camuso; Gregg Kiona; Jessica Lally; Kate Valdez; Noah Oliver  
**Subject:** RE: 47 Degrees North Notice of Application  
**Attachments:** 2019-12-09417\_083121\_Additional Work Requested\_Permit Potentially Required.pdf

Hi Kathi,

Attached is our letter regarding the project referenced in the subject line. Please contact me with any questions.

All the best,

**Sydney Hanson, MA** (she/her) | **Transportation Archaeologist**  
360.280.7563 (cell) | [sydney.hanson@dahp.wa.gov](mailto:sydney.hanson@dahp.wa.gov)

Department of Archaeology & Historic Preservation | [www.dahp.wa.gov](http://www.dahp.wa.gov)  
1110 Capitol Way S, Suite 30 | Olympia WA 98501  
PO Box 48343 | Olympia WA 98504-8343

My schedule: M-F 7:00 AM – 3:30 PM

 Please consider the environment before printing this email

**From:** Kathi Swanson <[kswanson@cleelum.gov](mailto:kswanson@cleelum.gov)>  
**Sent:** Tuesday, August 17, 2021 10:23 AM  
**To:** SEPA (DAHP) <sepa@dahp.wa.gov>  
**Subject:** FW: 47 Degrees North Notice of Application

---

### External Email

---

My apologies. This was sent to you originally on Friday, but bounced back because I had an incorrect email address. Please let me know if there is anything I can do.

Kathi Swanson  
CITY CLERK



119 W First Street  
Cle Elum, WA. 98922  
(509) 674-2262 ext. 103  
[kswanson@cleelum.gov](mailto:kswanson@cleelum.gov)  
[www.cityofcleelum.com](http://www.cityofcleelum.com)



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

August 31, 2021

City of Cle Elum  
Attn: Planning Department/47 Degrees North  
119 W First St  
Cle Elum, WA 98922

In future correspondence please refer to:

Project Tracking Code: 2019-12-09417

Property: Proposed 47 Degrees North project by Sun Communities Inc.

Re: Additional Work Requested; Permit Potentially Required

To whom it may concern:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. Should additional information become available, our assessment may be revised.

The City of Cle Elum has consulted previously with DAHP on the 47 Degrees North project. Prior to the receipt of the Proposed Major Modification on 8/17/2021, the Yakama Nation had requested additional revisions to the cultural resources report by Cultural Resource Consultants, LLC (CRC). The Yakama Nation reiterated their request in another letter dated 8/13/2021. It is unclear whether the City and/or the project proponent has asked CRC to complete these revisions. DAHP would appreciate an update on this.

DAHP agrees with the Yakama Nation that areas added to the 47 Degrees North project area through the Major Modification should be surveyed for cultural resources.

If disturbance is planned within the boundaries of any prehistoric or NRHP-eligible historic archaeological sites within the project area, the project proponent must obtain a site alteration permit from DAHP. Please contact Lance Wollwage, Assistant State Archaeologist, for additional information on permitting (Lance.Wollwage@dahp.wa.gov).

We recommend that any historic buildings or structures (45 years in age or older) located within the project area are evaluated for eligibility for listing in the National Register of Historic Places on Historic Property Inventory (HPI) forms. We highly encourage the SEPA lead agency to ensure that these evaluations are written by a cultural resource professional meeting the [SOI Professional Qualification Standards in Architectural History](#).

Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving any correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.



Thank you for the opportunity to comment on this project. Please ensure that the DAHP Project Tracking Number is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. Please also ensure that any reports, site forms, and/or historic property inventory (HPI) forms are uploaded to WISAARD by the consultant(s).

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Sydney Hanson". The signature is fluid and cursive, with a long horizontal line extending to the right.

Sydney Hanson  
Transportation Archaeologist  
(360) 280-7563  
Sydney.Hanson@dahp.wa.gov



## Virgil Amick

---

**From:** Nicky Pasi <nicky.pasi@mtsgreenway.org>  
**Sent:** Thursday, September 9, 2021 11:58 AM  
**To:** Planning; Jay McGowan; John Glondo; Ken Ratliff; Beth Williams; Mickey Holz; Steven Harper; Matthew Lundh; Ruston Weaver  
**Cc:** bocc@co.kittitas.wa.us; sheriff.office@co.kittitas.wa.us; publicworks@co.kittitas.wa.us; clerk@ci.roslyn.wa.us; mayor@ci.roslyn.wa.us; sce@inlandnet.com; kuss-cybulam@cersd.org; waoutdoorschool@gmail.com; executivedirector@cleelumdowntown.com  
**Subject:** 47 Degrees North Comment Letter  
**Attachments:** Greenway Trust\_47DNorth Comments.pdf

Good Afternoon,

Thank you for the opportunity to share comments regarding the Major Modification Application submitted by Sun Communities for their 47 Degrees North development. Please accept the attached, as well as my regards for your commitment to this open public process.

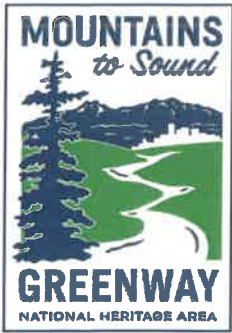
Sincerely,

Nicky Pasi (she/her)  
Upper Yakima Basin Community Coordinator  
Mountains to Sound Greenway Trust  
(509) 656-4073

*Check out [our blog](#) to stay up to date on what we're doing in the Greenway!*

Follow us: [Instagram](#) | [Facebook](#) | [Twitter](#)





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Washington State Department of Natural Resources

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September 8, 2021

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American Whitewater  
Amanda O'Rourke, CPA, Partner, Greenwood Ohlund & Co.  
David Patton, Northwest Area Director, The Trust for Public Land  
Kizz Prusia, Project Associate, Triangle Associates  
Charles Raines, Director Cascade Checkerboard Project, Sierra Club,  
Washington State Chapter  
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AAA Washington  
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Jody Weil (X), Supervisor, Mt. Baker-Snoqualmie National Forest

(\*) Executive Committee Member  
(X) Ex-Officio (non-voting) Director

MTSGREENWAY.ORG

Honorable Mayor Jay McGowan and Council  
City of Cle Elum  
119 West First St.  
Cle Elum, WA 98922

Dear Mayor McGowan and Councilmembers,

I write to you today as a representative of the Mountains to Sound Greenway Trust, a nonprofit that works to connect our local communities with the outdoors. We have collaborated with residents, businesses, government staff, and land management agencies since 1990 to implement projects like the Wye Park, Flagpole Park, Coal Mines Trail, Towns to Teanaway, and the Teanaway Community Forest. We would like to share thoughts and concerns regarding the City of Cle Elum's development agreement with Suncadia (Trendwest), and the recent major amendments proposed by Sun Communities, known as the 47 Degrees North Development.

The changes requested by Sun Communities within the recently-completed Supplemental Environmental Impact Statement include:

- Installing 707 manufactured residential units onsite. The key difference here is that, under Sun Communities' new proposal, the proponent will retain ownership of the land and rent the units. [This model has been shown to depreciate in value](#), instead of allowing community members to purchase property, build equity, and invest in their communities;
- Creating a new 627 site RV resort which, if completed, will be largest of its kind in Washington state. While the RV park boasts amenities for its guests, they will only be available to the community at large on a fee-rate basis;
- Removing the approved 25-acre business park from the development plan, leaving implementation and ownership under Trendwest. The development timeline of that parcel has yet to be determined;

Other local entities and residents have spoken eloquently on the potentially detrimental impacts to roads, emergency response systems, and local vitality. Although this project may double the size of Cle Elum's population, Sun Communities commits only to a share fee contribution instead of outright mitigation. Such an arrangement would place a great deal of the cost and burden on the leadership, public servants, and taxpayers of the upper county.

The Greenway Trust encourages the City and its officers to also consider the





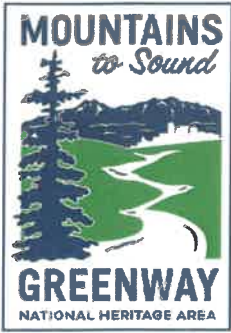
increased stress and impact on Upper Kittitas County's natural resources and recreational amenities. In recent years, our communities have become more cognizant of the value of these resources, both to our physical and mental health, and to our local economies as we transition from timber and coal. The [2020 Economic Analysis of Recreation in Washington State](#) found that outdoor recreation generated \$305,936,000 annually in Kittitas County (up from \$185,325,000 in 2015), supporting more than 1,600 jobs.

However, the sharp spike in recreation numbers during the COVID-19 pandemic demonstrated how our public lands can be loved to death; trails were trampled, trailheads and parking lots overflowed, and refuse abounded. In 2019-2021, the Greenway Trust worked (and continues to work) ceaselessly alongside the US Forest Service, WA Depts. of Natural Resources and Fish and Wildlife, and WA State Parks to respond to sanitation needs, increased risk of man-made fires, injurious accidents, and deteriorating and unsafe trail conditions caused by unprecedented wear and tear. Kittitas County's natural resources are a regional draw and a treasured part of our communities' character, but they must be stewarded sustainably. We are concerned that the plan proposed by Sun Communities does not acknowledge such impacts, or provide the means to mitigate them.

After reviewing the Supplementary Environmental Impact statement, we respectfully request that the City of Cle Elum exercise its powers to condition acceptance of this proposal by:

- Requiring the developer submit a plan for connecting paths and trails within the development area to existing networks, at the developer's own cost;
- Requiring the developer fund permitting and construction of expanded/improved trailhead facilities within the communities of Cle Elum and Roslyn;
- Establishing a percentage of the RV Rental fees be designated for maintenance of paths, trails, and other facilities;
- Including a buffer of native vegetation along Bullfrog Road, as Suncadia was required to do, to obscure view of the development and maintain community character;
- Otherwise condition the developer for funding, constructing, and long-term maintenance of any infrastructure needed to support the project.

If these conditions are not feasible, we hope you will consider denying the amended proposal, and returning to the approved 2002 development agreement.



The 47 Degrees North project represents the largest development in the city of Cle Elum's history. The Greenway Trust was founded in 1990 under somewhat similar circumstances: rapid growth in Seattle-adjacent communities cutting off access to the outdoors and stirring up citizen concerns about their quality of life and availability of public services. We have seen the dividends of thoughtful and well-planned development, as well as the impacts of hurried construction. A forest, once trampled, is not restored without great expenditures of funds, effort, and will.

I hope that you find this perspective helpful as you consider the path forward for Cle Elum and Upper Kittitas County.

Sincerely,

A handwritten signature in black ink, appearing to read "Nicky Pasi".

Nicky Pasi  
Upper Yakima Basin Community Coordinator  
Mountains to Sound Greenway Trust

cc: Kittitas County, Board of County Commissioners  
Kittitas County Sheriff's Office  
Kittitas County Public Works  
City of Roslyn  
City of South Cle Elum  
Cle Elum-Roslyn School District  
WA Outdoor School  
Cle Elum Downtown Association



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
1250 West Alder Street • Union Gap, Washington 98903-0009 • (509) 575-2490

August 25, 2021

Virgil Amick  
City of Cle Elum  
119 W First Street  
Cle Elum, WA 98922

Re: Major Modification for the Bullfrog Master Site Plan

Dear Virgil Amick:

Thank you for the opportunity to comment on the Notice of Application for the Major Modification for the Bullfrog Master Site Plan, proposed by The Atwell Group, on behalf of Sun Communities.. The Department of Ecology (Ecology) has reviewed the application and has the following comments.

**WATER QUALITY**

Project with Potential to Discharge Off-Site

The NPDES Construction Stormwater General Permit from the Washington State Department of Ecology is required if there is a potential for stormwater discharge from a construction site with disturbed ground. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.

The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>. Please submit an application or contact **Wendy Neet** at the Dept. of Ecology, (509) 454-7277 or email [wendy.neet@ecy.wa.gov](mailto:wendy.neet@ecy.wa.gov) with questions about this permit.

Sincerely,

A handwritten signature in blue ink that reads "Gwen Clear".

Gwen Clear  
Environmental Review Coordinator  
Central Regional Office  
(509) 575-2012  
[crosepa@ecy.wa.gov](mailto:crosepa@ecy.wa.gov)

202104470



## Cle Elum – Roslyn – South Cle Elum Police Department

*In The Heart of the Cascades*

*Chief of Police – Kirk Bland*

---

807 W Second St ♦ Cle Elum, WA 98922 ♦ 509-674-2991 ♦ Fax 509-674-2918 ♦ Dispatch 509-925-8534  
[policerecords@cityofcleelum.com](mailto:policerecords@cityofcleelum.com)

October 20, 2020

SEPA Responsible Official

City of Cle Elum

119 W 1<sup>st</sup> St

Cle Elum, WA 98922

I am submitting this letter in response to an email I had received from the Cle Elum City Planner, Lucy Temple on October 12, 2020. I had asked Mrs Temple some questions that arose after reviewing the DSEIS for the 47 North Project. Mrs Temple forwarded my questions to Richard Weinman, who in turn, tasked Gretchen Brunner to respond.

I have reviewed the response provided by Ms Brunner in her e-mail and have attached the e-mail string for reference. In regards to Exhibit 23 in Appendix K-Fiscal and Economic Report, Ms Brunner states that this is the section of the DSEIS that shows the estimated Police costs under SEIS Alt. 5 and 6 which includes the costs of new officer and associated vehicle/equipment needed for the SEIS Alternatives. This section also indicates that they used the officers/population approach to determine these staffing needs.

I would like to note that the costs provided in the DSEIS are not consistent with the true costs I had previously submitted, nor was the number of Officers required to mitigate the impacts this development would create on the Police Department. I disagree with the simplistic approach of modeling staffing needs based on the officers/population modeling method. This simple modeling method is not recommended by the ICMA (International City/County Management Association) and is viewed, "As easy as it is to comprehend and apply, this model is equally inefficient and unreliable." This modeling concept is discussed in a paper written by Dr James McCabe who is a Senior Associate for the ICMA.

I included Dr. McCabe's paper in my SEIS staffing model as a reference to support the workload-based model of staffing that the Cle Elum Police Department has adopted to adequately staff the Police Department. Although the DEIS mentions that they received my submission for staffing needs based on this modeling technique, none of their charts, numbers, or information reflect that this modeling method is being utilized. The ICMA is a strong advocate to a workload-based approach "as it relies on actual levels of demand for Police services and matches the demand with the supply of Police resources."





## Cle Elum – Roslyn – South Cle Elum Police Department

*In The Heart of the Cascades*

*Chief of Police – Kirk Bland*

---

807 W Second St ♦ Cle Elum, WA 98922 ♦ 509-674-2991 ♦ Fax 509-674-2918 ♦ Dispatch 509-925-8534  
[policerecords@cityofcleelum.com](mailto:policerecords@cityofcleelum.com)

The DSEIS report shows that there will be a need for 6.7 Officers by the year 2051 when development will be completed for Alt 5 and 5.5 Officers for Alt 6 by the year 2037. By using the modeling method I had submitted and provided supporting documentation for this modeling method, the number of Officers needed for Alt 5 clearly shows the need for 12 Officers by 2044 and 8 Officers for Alt 6 by the year 2030. There is obviously a large discrepancy between these two modeling methods. I encourage you to review the paper written by Dr McCabe on this topic for a better understanding on how to more efficiently and reliably staff for a Police Department. As Dr McCabe states in this paper, “Relying on antiquated and unreliable methods to make one of the most financially important and critical decisions with respect to the quality of life and safety of a community is ill-advised.”

Another factor regarding the officer/population approach for staffing levels referenced in the DSEIS states that this approach is based on the existing police officers/population. I again argue this is not a responsible equation to use because it is based on the EXISTING police officer/population equation. The Cle Elum Police Department is currently understaffed for the current population. Therefore utilizing this ratio of police/population will only worsen as more citizens move into the development. A quick search into the FBI database shows that the City of Cle Elum falls under a Group VI city with a population under 10,000 citizens. The chart provided by the FBI shows that the average number of officers per 1,000 citizens in cities under a total population of less than 10,000 people is 3.5. The DSEIS states that the population of the cities the Cle Elum Police Department currently serves is just over 3300 people. Therefore, by applying the officer/population ratio as a staffing model, the current staffing of the Cle Elum Police Department would be 11.5 Officers.

The DSEIS also states that this development could bring 1,334 residential units with an estimate of 2.5 people per unit for a total of 3,335 people. This would basically double the amount of population and double the footprint of our current jurisdiction. By using the officers/population modeling method preferred by the writers of the DSEIS of 3.5 Officers/1000 citizens, this would indicate a need of 11.5 Officers, not 6.7 as shown on Chapter 1 Page 1-12.

The DSEIS also shows a “one-time cost of \$25,000/FTE was also assumed for vehicles/equipment”. I am not sure how this number was derived, but this dollar amount does not reflect the true cost of a vehicle and equipment for a Full Time Employee (FTE). I have recently priced and submitted for lease/purchase for a patrol vehicle and the bid I had received was just over \$53,000 plus tax per vehicle. I am assuming that this figure was overlooked and the \$25,000 figure documented in the DSEIS was based solely on equipment and training costs per FTE upon hiring and did not include the cost of a patrol vehicle.





## Cle Elum – Roslyn – South Cle Elum Police Department

*In The Heart of the Cascades*

*Chief of Police – Kirk Bland*

---

807 W Second St ♦ Cle Elum, WA 98922 ♦ 509-674-2991 ♦ Fax 509-674-2918 ♦ Dispatch 509-925-8534  
[policerecords@cityofcleelum.com](mailto:policerecords@cityofcleelum.com)

Another point I would like to mention that has not been addressed thus far is the need for additional Office/Records staff. I have been asked for input on the need for additional Police Officers caused by the impact of the 47 North development and the costs associated with adding more Police Officers, but there has been no inquiry on how this development will affect our front office staff. Currently we have one full time Executive Assistant/Records Manager and one part-time Records Technician. Once more Officers are added to handle the increased work load, the office staff will experience an equivocal amount of additional work. The projected need for additional office staff would be a full time Executive Assistant, a full time Records Manager and a full time Records Technician. This can be accomplished by hiring a new person to fill the Records Technician position and making our current part time Records Technician a full time employee with the title of Records Manager.

Upon completion of hiring the necessary Police Officers and front office staff, it would necessitate a larger building to accommodate staff. Our current building was not designed or built with the expectation of increasing staffing to these levels. I have not researched the costs associated to fund a new building or adding on to the existing building.

I am requesting that this letter in response to the drafted DSEIS document be considered to correct the inconsistencies shown in the current DSEIS for the 47 North Project.

Respectfully,

Kirk Bland

Chief of Police



**KITTCOM (KITTITAS COUNTY 911)**

700 ELMVIEW RD  
ELLENSBURG, WASHINGTON 98926  
509/925-8534 • FAX 509/925-8540

JULY 28, 2021

Mayor McGowan  
Cle Elum City Council members  
119 W 1<sup>st</sup> St  
Cle Elum, WA 98922

Dear Mayor and City Council Members:

I am writing you today to express concern regarding the 47 Degree North Project. It is my understanding that a formal application is expected soon for your review and approval.

To date, my understanding of this project is that it would increase recreational opportunities to the area through the development of an RV Resort. I also understand a manufactured home community is being planned. The total impact of this has the potential to nearly double the population of the City of Cle Elum.

Dispatch services for City of Cle Elum Police, Fire and Hospital District 2 (Upper Medic 1) accounted for approximately 11% of the overall workload at KITTCOM from July 2019 – June 2020. These numbers do not account for any law enforcement response to the many areas of recreation surrounding Cle Elum, nor does it account for surrounding Fire District responses to those areas, for which we provide 9-1-1 emergency call answering and dispatch services for. As these agencies look to address their staffing and response needs to such growth, KITTCOM will be forced to do the same. KITTCOM will require more staffing to keep up with an anticipated increased call volume and need to assist other agencies.

Failure to address staffing needs at KITTCOM with such a change in the upper county could have county wide consequences. Staff will be unable to answer the phone as quickly as they can now, which means the time it takes to dial 9-1-1 and have someone answer that call will increase county wide. It will also force us to reduce our service level to our user agencies county wide during times of high call volumes.

I appreciate you each taking the time to consider the public's safety and the safety of your responders when considering the proposal.

  
George Long  
Director



June 22, 2021

Mayor McGowan  
City of Cle Elum  
119 W 1<sup>st</sup> St  
Cle Elum, WA 98922

Dear Mayor McGowan:

In April of 2020 Kittitas County Public Hospital District #2 responded to a request for information from EA Engineering Science, and Technology, Inc., PBC regarding the proposed 47 North Master Plan Project. We understand that the plans for the development have changed considerably since 2020. KCPHD#2 is deeply concerned about the impact the new configuration will have on the viability of Medic One ambulance services in upper Kittitas County.

We look forward to learning more about the new proposal and discussing the impact this development will have on the critical ambulance services provided to our communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Petersen".

Julie Petersen, CPA  
Superintendent  
Kittitas County Public Hospital District #2  
Dba: Medic One  
603 S. Chestnut Street  
Ellensburg, WA 98926

Cc: Gary Berndt, Planning Commission, Chair  
Lucy Temple, City of Cle Elum, Planner

505 Power Street  
Cle Elum, WA 98922  
509.674.4057



**KITTITAS COUNTY**

# **SHERIFF'S OFFICE**

*Clay Myers, Sheriff*

8/12/2021

Board of County Commissioners

The Sheriff's Office is grateful for the opportunity to note our concerns regarding the 47 North development in the Bullfrog Flats area of Cle Elum. After reviewing the extensive information the City has made available, including the substantial changes from the original proposals for 47 North, we have several concerns about the impact of this project on county Law Enforcement.

Our first and overriding concern is the significant shift to non-landed residences and recreational vehicles. We believe the current proposal will result in a large portion of 47 North being bought up and used by people who are not full-time residents and not invested in Cle Elum or Kittitas County. It will likely produce an influx of part-time residents and short time renters who lack attachment and commitment to our community and who are historically associated with higher rates of nuisance, conflict, and crime. We understand and support the need for affordable housing in Cle Elum and the Upper County. That need, though, could be better addressed as a portion of a plan less prone to produce a rootless and problematic population center, based on owner-occupied land.

We believe the density of the current proposal will impact traffic safety and our already taxed transportation infrastructure. The current proposal includes hundreds of residences and hundreds of additional RV slips. In the case of the RV slips there is no real doubt that most will access 47 North via Bullfrog Rd. It is also likely that many users of the manufactured housing units will frequently access the development from I-90, and thus Bullfrog Rd.

Bullfrog Rd is already the exclusive access route to all Suncadia properties and the primary access route to a vast area of residential, business and recreational property in and north of Roslyn. The periodic, 'surge' type of traffic that occurs on Bullfrog Rd—primarily moving in one direction at the time of any given 'surge'—compounds the potential impact of increased usage beyond the simple number of vehicles involved. Because Bullfrog Rd is a 'choke point' on the route to many upstream resources, impacts to Bullfrog would affect large numbers of residents in and visitors to our county.

We understand the only mitigations currently planned for traffic control at the Bullfrog and SR903 outlets from 47 North are stop signs. We view that as inadequate and believe that this under-control of projected traffic, including hundreds of RV's, will result in serious periodic congestion and a high risk of collisions. We would urge that any specific mitigation recommendations from Kittitas County Public works should be supported.

Another area of concern is the Cle Elum/Roslyn School District. The families that will occupy homes in 47 North will include children who will primarily attend public schools in the unincorporated county. The draft EIS for 47 North considers the traffic impacts of this increased traffic; but an increased school

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**KITTITAS COUNTY**

# **SHERIFF'S OFFICE**

*Clay Myers, Sheriff*

population has other impacts, including on Law Enforcement. The safety and security of these new students in the Cle Elum Roslyn district will fall to the Sheriff's Office. Growth of the CERSD student body will increase not only the security measures necessary to safeguard students; it will increase the number of investigations that arise from student contacts and students' disclosures. We cooperate regularly and effectively with CERP in such investigations and the Sheriff's Office has no higher priority than the well-being of youth and students. That well-being and those investigations, however, come at a cost, which may not have been factored into the 47 North EIS.

A final area of concern is the increased usage of local outdoor recreational resources. Residents of Kittitas County love its opportunities to visit and recreate in wild places, open lands and waterways; we're sure people drawn to 47 North would feel the same way. The Sheriff's Office plays a large role in the enforcement of law and the protection of the safety of the public in its pursuit of outdoor recreation. We routinely work with state and federal Law Enforcement partners to address problems of access and parking and to investigate criminal complaints in outdoor spaces throughout the Upper County. The Sheriff's Office also bears responsibility for locating and assisting lost and injured adventurers and works together with Kittitas County Search And Rescue on scores of missions every year. An increase in outdoor recreation will necessarily and unfortunately result in more such crises.

There is no simple way to calculate the magnitude of the impacts of over a thousand new residences in the city of Cle Elum accessing their neighborhood via county roads, recreating in the county and sending their children to public schools in the county. It is certain, however, that there will be an impact: that the Sheriff's Office will be called on to shoulder a part of the public safety and emergency service needs of the new residents of 47 North, with costs in manpower and equipment. We believe the most important step to mitigate and manage impacts is to reject elements of the proposal likely to increase part-time, short-terms and temporary residents.

We are confident that CEPD Chief Kirk Bland has assessed the potential impacts of 47 North for public safety and criminal enforcement within the city of Cle Elum and has a plan to continue the excellent service of CEPD. We look forward to continuing our productive cooperation with CEPD and hope that Chief Bland's recommendations for mitigation and support are accommodated.

In closing, I will again emphasize my opinion that a 47 North project combining remote, corporate land ownership and users who are not full-time, vested residents will result in attitudes and practices that are destructive of community and associated with higher rates of crime. I hope the county will advocate for a return to a vision for the 47 North project that will avoid these outcomes.

Sincerely,

  
Clay Myers

Kittitas County Sheriff