

APPENDIX F

SUMMARY OF MITIGATION MEASURES & SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The following summary compiles all mitigation measures identified in the Final SEIS to address the significant adverse impacts of the SEIS Alternatives. The mitigation measures are updated and augmented in a few instances to reflect the updated analysis of the Revised Proposal that is contained in the SEIS Addendum. Mitigation measures that have been updated for the Revised Proposal are noted with underlined or strike-through text. The mitigation measures are organized into several categories, as described below.

- **Proposed Mitigation Measures (Included in the Project)** reflect several types of measures. There are measures that the Applicant has preliminary proposed; that are included or implicit in the revised Master Site Plan contained in the pre-application materials submitted to the city; that are based on measures included in the SEIS and adapted to reflect the Revised Proposal; and/or are above and beyond the “Required Mitigation Measures” described below. This category of measures also includes certain conditions of approval from the 2002 Bullfrog Flats Development Agreement, which were developed to mitigate the environmental impacts of the Bullfrog Flats Master Site Plan as identified in the 2002 Cle Elum UGA Final EIS and through the approval processes for the project. These conditions are summarized in the mitigation measures, some verbatim and others paraphrased for the sake of simplicity.

Because substantial time has passed since the Development Agreement was executed, a lack of complete documentation, and changes in the proposal, the rationale or need for certain of the conditions or some specific requirements is not clear. Also, certain of the conditions no longer apply because they have been performed (e.g., certain properties have already been dedicated to the city). Therefore, only identified conditions of approval that clearly appear to pertain to the Revised Proposal, and which the Applicant has preliminarily agreed to include in, or are implicit in, the revised project, are listed in this summary; modifications that are considered appropriate to reflect the changes in the Revised Proposal and the updated analysis in the Addendum are also identified (underlined or strike-through). It should be noted that these conditions are not categorized as “included in the project” at this point because a formal Master Site Plan Amendment application and a proposed Development Agreement have not been submitted to the city as of this

writing. In addition, the City Council may decide to through the land use review process to add or delete individual conditions. However, it is assumed for purposes of the summary that Bullfrog Flats conditions of approval will likely become part of the proposal in the future. As such, the verb “would” is used in the SEIS Addendum to indicate a condition that is assumed to be relevant pursuant to the Addendum analysis and that the City could impose as a condition of approval.

- **Required Mitigation Measures** are measures required by code, laws, or local, state, and federal regulations and the word “would” is used to indicate that compliance is assumed.
- **Approved Bullfrog Flats Conditions of Approval (Not Included in the Project)** are measures that are based on the conditions of approval contained in the 2002 Development Agreement but that the SEPA consultant does not consider likely to apply to the Revised Proposal and will depend on changes to the adopted Development Agreement that may be proposed in conjunction with the major modification and new or updated Development Agreement. These measures are not included in the project at this point, as a formal Master Site Plan Amendment application has not been submitted to the City. As such, they are typically represented with the verb “should” in the Final SEIS and SEIS Addendum to indicate a condition recommended by the City.
- **Other Possible Mitigation Measures** are other measures identified by the SEIS team and the city that could be implemented to further reduce impacts and are represented with the verbs “should” or “could”.

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

Earth

Required Mitigation Measures

Structural Standards

- The Cle Elum Municipal Code includes performance standards for development in geologically hazardous areas (CEMC 18.01.070 (F)) that would be followed for development on the 47° North site. These standards include the following:
 - Structures and improvements shall minimize alterations to the natural contour of the slope, and foundations shall be tiered where possible to conform to the existing topography;

- Structures and improvements shall be located to preserve the most critical portion of the site and its natural landforms and vegetation;
- The proposed development shall not result in greater risk or a need for increased buffers on neighboring properties; and
- Development shall be designed to minimize impervious surfaces within the critical area and critical area buffer.

Erosion Hazards

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

Landslide Hazards

- Foundation setbacks for buildings and other structures would comply with criteria established in Section 1808.7 of the 2015 *International Building Code* (IBC), including:
 - For foundations located adjacent to the top of steep (> 33.3%) slopes, the face of the foundations would be set back from the steep slope a distance equal to or greater than the lesser of 40 feet or $H/3$ where “H” is equal to the height of the steep slope; and
 - For structures located adjacent to the toe of a steep (> 33.3%) slopes, the face of the structures would be set back from the toe of the steep slope a distance equal to or greater than the lesser of 15 feet or $H/2$ where “H” is equal to the height of the steep slope.
- Placement of structural fill would be avoided on or adjacent to the top of steep (greater) than 40% slopes.
- Permanent cut or fill slopes would not exceed a maximum inclination of 50%.

- Infiltration facility setbacks from steep slopes would comply with requirements outlined in the 2019 Ecology Manual. Specifically, the 2019 Ecology Manual requires that infiltration ponds be set back from the top of a slope of 15% or steeper at a distance equal to or greater than the height of the slope. The 2019 Ecology Manual allows for lesser or greater setbacks where a comprehensive site assessment concludes that the alternate setback is justified based on the site conditions. Slopes in excess of 15% exist on the ~~adjacent 25-acre commercial property and on the municipal/community recreation center site~~. Siting of infiltration facilities in this area would consider the slope setback requirements of the 2019 Ecology Manual.

Other Possible Mitigation Measures

Coal Mine Hazards

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

Significant Unavoidable Adverse Impacts

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

Water Quantity & Quality

- Note: Proposed development under the revised Master Site Plan would not directly impact any on or off-site water resources (e.g., wetlands and streams). Therefore, no mitigation is warranted for direct impacts.

Bullfrog Flats Conditions of Approval (Included in the Project)

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

to the City of Cle Elum. The transfer of water rights to the City is pending as of this writing.

Required Mitigation Measures

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

Significant Unavoidable Adverse Impacts

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

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

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

Plants, Animals, & Wetlands

Proposed Mitigation Measures (Included in the Project)

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

Bullfrog Flats Conditions of Approval (Included in the Project)

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

Required Mitigation Measures

- The 47° North project would adhere to the City of Cle Elum critical areas ordinance and Shoreline Master Program regulations regarding avoidance and minimization of impacts, as well as buffer requirements and protection of fish and wildlife habitat conservation areas.
- Construction limits, including staging areas, would be clearly marked in the field prior to beginning construction activities.
- The limits of wetland buffer areas would be clearly marked on construction plans and in the field to prevent unauthorized damage to critical areas during construction.

- Construction staging areas would be located outside of wetland buffers within the RV resort area to minimize impacts to vegetation.
- Any wetland buffer areas temporarily disturbed for construction access and staging would be revegetated with a mixture of native plant species following completion of construction activities, pursuant to an approved mitigation plan.
- Vehicle re-fueling and maintenance activities would be avoided within wetland buffers, or within at least 100 feet of wetlands.
- Appropriate BMPs and TESC measures would be implemented in accordance with an approved SWPPP, consistent with standards of the 2019 Ecology Manual, including specific measures to prevent and control spills of pollutants, and to handle, control, and store potential contaminants and their potential to damage surface waters and fisheries resources.
- A permanent stormwater management system would be designed and installed consistent with the 2019 Ecology Manual and applicable City of Cle Elum development regulations in place at the time of permitting for project. Operation of this system would avoid and minimize the potential for impacts on surface waters and fisheries resources.
- As necessary, clean stormwater runoff would be directed to the wetlands' catchment area to retain the wetland hydrology.

Other Possible Mitigation Measures

- Where feasible, conservation easements could be conveyed to additional large forested open space areas across the site – beyond those associated with the Cle Elum River corridor – which would enable these areas to be managed for healthy forests and wildlife habitat in coordination with recreational uses.
- To address impacts of increased angler fishing pressure on fisheries resources and habitat, WDFW is expected to continue to manage the regional fishery. They would continue to monitor fishing in the Cle Elum and Yakima Rivers and evaluate local fish populations. If problems were identified, WDFW would likely implement selective gear rules in affected areas. If fish populations continued to decline, WDFW could apply catch and release regulations in additional areas, narrow the fishing season, or as a last resort enact closures.
- To mitigate impacts of increased fishing pressure on fisheries resources with proposed development, the Applicant could: 1) explore angler management options with the WDFW and Yakama Nation, such as increased angler education, dispersing angling

pressure to underused areas, and providing alternatives to traditional fishing opportunities; 2) implement creel surveys (coordinated with WDFW) to address issues directly related to angler fishing presence; and/or 3) implement fish population surveys (coordinated with WDFW to assess quantitative changes in discrete stream reaches).

- Hiking trails could be located outside the Cle Elum River corridor so that elk viewing would be possible without traversing the elk habitat. Elk viewing areas could be established.
- Bear-proof garbage receptacles, well-signed natural areas, informational signage about the risks associated with living near natural areas, well-marked common road crossings, well-marked speed limits, and environmental education and outreach could be implemented to help minimize human/wildlife conflicts.
- A potential measure could be included in the Land Stewardship Plan or in another agreement to develop a plan to manage retained open space areas to better facilitate elk, which could help reduce their impacts elsewhere.

Significant Unavoidable Adverse Impacts

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

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

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

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

Air Quality/Greenhouse Gas Emissions

Proposed Mitigation Measures (Included in the Project)

- Construction Emission Control: All contractors would be required to implement air quality control plans for construction activities. Air quality control plans would include BMPs to control fugitive dust and odors such as:
 - Use water sprays or other non-toxic dust control methods on unpaved roadways;
 - Minimize vehicle speed while traveling on unpaved surfaces;
 - Prevent track-out of mud onto public streets;
 - Cover soil piles when practicable; and
 - Minimize work during periods of high winds when practicable.

- The following mitigation measures would be used to minimize air quality and odors issues caused by construction equipment tailpipe emissions:
 - Maintain the engines of construction equipment according to manufacturers' specifications;
 - Minimize idling of equipment while the equipment is not in use; and
 - If there is heavy traffic during some periods of the day, schedule haul traffic during off-peak times (e.g., between 9:00 AM and 4:00 PM) when it would have the least effect on traffic and would minimize indirect increases in traffic-related emissions.

- Single family and some of the multi-family residences under ~~SEIS Alternative 6~~ the Revised Proposal would consist of manufactured housing, which research has shown can result in reduced construction-related GHG emissions compared with stick-built houses.

- Wood-burning stoves would not be permitted in the proposed residences.

- Wood-fueled campfires would not be permitted in the RV resort area.

Required Mitigation Measures

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

Other Possible Mitigation Measures

- The Applicant should consider using energy efficient lighting in the project.

- The use of solar energy could be considered and analyzed further.

Significant Unavoidable Adverse Impacts

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

No significant unavoidable adverse operational impacts on regional or local air quality are anticipated with the SEIS Alternatives and the Revised Proposal. The 47⁹ North site is located within an air quality attainment area for all criteria air pollutants and the project is not expected to pose issues related to air toxics.

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

Noise

Proposed Mitigation Measures (Included in the Project)

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

Bullfrog Flats Conditions of Approval (Included in the Project)

- Construction would be limited to 7:00 AM to 7:00 PM, Monday through Saturday. Sunday construction should be on an emergency basis only and would need to be approved by the city.
- All construction equipment would have adequate mufflers, intake silencers, and engine enclosures to minimize construction equipment noise.
- Any stationary equipment that generates noise would be located away from sensitive receivers, including residential uses, the school property, the cemetery, and open space areas.

- Equipment servicing and maintenance times would be unrestricted. The city may review and approve case-by-case exceptions to this condition if justified to comply with Washington State Department of Natural Resources industrial restrictions.

Required Mitigation Measures

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

Other Possible Mitigation Measures

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

Significant Unavoidable Adverse Impacts

Noise levels would increase in the study area due to short-term clearing/grading, demolition and construction noise, and long-term traffic and human noise under the SEIS Alternatives and the Revised Proposal. The noise from the proposed residential, commercial, and

parks/recreational uses is expected to be minor; with implementation of the mitigation measures listed above, no significant impacts are expected.

Land Use

Proposed Mitigation Measures (Included in the Project)

- Approximately 477 acres (58% of the site) should be retained in open space, including critical areas such as the Cle Elum River, wetlands, and steep slopes. A total of approximately 553 acres of open space (62% of the site) would be part of the project, including undeveloped open space (such as community/ recreation open space, stormwater open space, and steep slope areas and their buffers), wetlands and their buffers, and the powerline right-of-way. Existing easements are in place to protect the River Corridor Open Space and Managed Open Space in the western portion of the site. These easements would be retained by New Suncadia or transferred to the Applicant (Sun Communities).

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

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

Required Mitigation Measures

- Mitigation measures identified in numerous sections of the SEIS and Addendum would also minimize land use impacts from construction activities, consistent with City regulations (see DSEIS, FEIS, and Addendum sections on Earth, Air Quality/GHG Emissions, Noise, and Transportation).
- The proposed uses and land use standards would be consistent with the City of Cle Elum Comprehensive Plan and zoning for the site). This conclusion would be verified based on submittal of the 47° North Master Site Plan application and consistency analysis contained in a staff report for the proposal.
- Development of the commercial center would maintain the 50-foot-wide platted buffer adjacent to the SR 903 right of way. ~~would be maintained with possible commercial development on the adjacent 25-acre property.~~

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

- Note: The Bullfrog Flats approval required conveyance of a useable area of 7.5 acres to the City of Cle Elum, or another public or non-profit entity approved by the City, for development of a minimum of 50 affordable housing units. The 50 housing units were not counted towards the 1,334-unit cap for the Bullfrog Flats project. The parcel or parcels were required to be identified and conveyed prior to approval of the 250th residential housing unit. The Revised Proposal includes development and dispersal of 50 affordable housing units within the project in lieu of dedication of land. The existing condition would be deleted or modified.
- Note: A current development condition applicable to the Bullfrog Flats site only permits small-scale retail uses that would serve the convenience needs of residents and employees to be included on the commercial site. Retail uses would be limited to 10% of the floor area of the commercial development, and no individual retail use would contain over 5,000 sq. ft. Primary entrance to the retail uses would not be allowed from SR 903 or Bullfrog Road. The approved Bullfrog Flats project also includes 75 acres/950,000 sq. ft. of business park uses. The Revised Proposal includes an approximate 150,000-square foot commercial center (retail, restaurant and office uses) on a 25-acre site with vehicle access from SR 903, and no business park uses. Approval would require modification or elimination of the current limitations.

Other Possible Mitigation Measures

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

Significant Unavoidable Adverse Impacts

The conversion of the 47^o North site from undeveloped forest/vegetation to a mixed-use master planned community under the SEIS Alternatives and the Revised Proposal would represent a significant change in the existing land use of the site. Such change would be unavoidable if the proposal is implemented. The change would be consistent with the City of Cle Elum land use and zoning classifications for the site and is not per se an adverse impact to land use or land use patterns. The site is located within a city/UGA and is considered appropriate for urban development. The proposal would represent a continuation of the existing trend of intensifying development in the city and adjacent area. With implementation of identified mitigation measures, no significant adverse land use impacts are expected. It is acknowledged, however, that some residents may consider the proposed development to be significant and adverse because of its size, location, or other factors.

Aesthetics/Light & Glare

Proposed Mitigation Measures (Included in the Project)

- ~~Approximately 477 acres of the site would be preserved as open space, including natural open space, Managed Open Space, River Corridor Open Space, wetlands and their buffers, and power line easements. A total of approximately 553 acres of open space, including undeveloped open space (including community/ recreation open space, stormwater open space, and steep slope areas and their buffers), wetlands and their buffers, and the powerline right-of-way, would be included in the amended Master Site Plan.~~
- Development areas onsite would be arranged based, in part, on existing topographic features, as reflected in the preliminary Master Site Plan. Combined with existing, retained vegetation, site planning would block views of most elements of the project from most public off-site locations, and/or reduce the perceived visibility or scale of the overall project for viewers at ground level from locations where vegetation or topography does not.
- Proposed development would be consistent with architectural design and materials guidelines that would be developed by the Applicant for residential and other structures, and specifically tailored for the 47° North project site to ensure an overall consistent visual quality. Building materials would include muted colors and textures that are intended to blend into the existing natural setting and would be comprised primarily of wood and stone.
- Low-pressure sodium lights and full-cutoff shielding would be used on outdoor light fixtures.
- Residential area light fixtures would not be mounted higher than 30 feet.
- Unnecessary lighting of building facades would be avoided.
- Landscaping would be provided throughout the site and would be designed to create transitions and buffers between various land uses on and adjacent to the site, where necessary.
- Landscaping with native plants would help to connect the site visually and aesthetically to the surrounding area.

Bullfrog Flats Conditions of Approval (Included in the Project)

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

Required Mitigation Measures

- The 50-foot-wide platted buffer adjacent to the SR 903 right-of-way would be maintained in conjunction with proposed commercial development ~~on the adjacent 25-acre property~~. As feasible, and accounting for the need for signage, entry visibility, and similar design considerations, the existing forested vegetation in this area could be retained to partially screen the development and help maintain a natural, forested entry to the City of Cle Elum.

Other Possible Mitigation Measures

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

Significant Unavoidable Adverse Impacts

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

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

Roslyn, Suncadia, and I-90. However, the increase in skyglow would be mitigated through implementation of International Dark Sky Association lighting designs. With implementation of the mitigation measures listed above, no significant adverse aesthetic/light and glare/skyglow impacts are expected.

Housing, Population, & Employment

Proposed Mitigation Measures (Included in the Project)

- ~~The estimated monthly mortgage payment for the proposed single family housing could be affordable to city residents, based on 60% of the city's and county's 2018 Median Household Income (MHI) and dedication of 30% or less of a household's monthly gross income to housing and utilities. This affordable housing would be located onsite throughout the proposed residential development. Note: Fifty (50) affordable housing units would be integrated into the multi-family portion of the development. These affordable housing units would be developed and maintained by Sun Communities, but it is assumed that they would be managed by a public or non-profit entity approved by the city.~~

Bullfrog Flats Conditions of Approval (Included in the Project)

- ~~Access, water, and sewer would be constructed, consistent with development standards, up to the affordable housing parcel boundaries, as with every other parcel in the Master Site Plan. Note: The Revised Proposal includes provision of affordable units by the Applicant in lieu of dedication of a site for future development of those units by others; the acreage shown in SEIS Alternatives 5 and 6 as being dedicated to the city for affordable housing development would be retained as undeveloped open space. The existing requirement would be duplicative of the proposal, therefore, and would be deleted or modified depending on the City Council's action on the Revised Proposal. It is also noted that the adopted Bullfrog Flats Development Agreement makes the city responsible for providing sewer and water to the affordable units; the Addendum identifies and evaluates the incremental demand for utilities associated with those units so impacts can be mitigated by the appropriate party.~~
- ~~Sun Communities, as successor to New Suncadia, would be given the option in a new or updated Development Agreement to assist in the selection process for potential owners/developers of the affordable housing parcel. This condition is no longer relevant since the affordable housing would be integrated into the master plan's residential area and not located on a separate site.~~
- A minimum of 150 residential dwelling units, not including the 50 possible affordable housing units, would remain rental units and a covenant would be recorded on the

property to ensure this condition continues for 20 years. Note: This requirement would be met by the Revised Proposal. All proposed 180 multi-family housing units would be leased/rented; some of the single family housing would be leased/rented as well. A covenant may or may not be recorded to ensure this condition.

Required Mitigation Measures

- A housing policy in the 2019 City Comprehensive Plan (H-1.9) requires that affordable housing be provided in projects with more than 20 units. The Revised Proposal would exceed this requirement by providing 50 affordable housing units in the multi-family area onsite.

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

- ~~A useable area of 7.5 acres is required to be conveyed to the City of Cle Elum, or another public or non-profit entity approved by the city.~~ Note: Under the Revised Proposal, a separate area for affordable housing would not be conveyed to the city because this housing would be developed by the Applicant and integrated within the multi-family residential area onsite.
- The existing supply of affordable housing in Upper Kittitas County should periodically be monitored and inventoried, and as necessary advocated for, to help ensure that a continuous supply of housing is affordable for those earning the wages paid at the Suncadia resort. Note: This requirement does not appear to be necessary for the Revised Proposal given the reduced scale of housing and employment compared to the approved Bullfrog Flats project.
- The existing labor pool should be actively recruited, hired, and contracted with to minimize in-migration employment and associated housing impacts. Note: This condition may not be relevant to 47° North since construction labor demand would be considerably less than for Bullfrog Flats due to the inclusion of manufactured housing and its construction offsite.

Significant Unavoidable Adverse Impacts

Development of the 47° North site under the SEIS Alternatives and the Revised Proposal would increase housing demand, permanent population, and employment in the city. The amount of planned growth could be considered significant, and it is an unavoidable consequence of developing the Master Site Plan. In and of itself, however, growth is not necessarily an adverse impact if it has been properly planned for, including providing for adequate housing, infrastructure, and services (see DSEIS, FEIS, and Addendum Public Services, Transportation, and Utilities for information on the capacity of infrastructure and services to accommodate the SEIS Alternatives and the Revised Proposal, and mitigation measures to address any significant impacts). It is recognized, however, that some people

may consider any additional growth, and/or the particular types of development, to be an adverse impact.

Historic & Cultural Resources

Proposed Mitigation Measures (Included in the Project)

- ~~When the 25-acre property contemplated for future commercial use is proposed to be developed, a field investigation of the property should be conducted.~~
- The Applicant has voluntarily committed to pursue a Memorandum of Understanding (MOU) with the Yakama Nation regarding the protection of Cultural Resources on the 47° North project site. The Cultural Resources analyses in the SEIS and Addendum do not identify any direct impacts to resources located on the project site. In addition, the defined open space corridor adjacent to the Yakima River is subject to a pre-existing formal agreement that protects cultural and environmental resources within the defined open space. Notwithstanding these conclusions, the Applicant understands and appreciates that the Yakama Nation defines “cultural resources” more broadly than archaeological artifacts, and that this broader definition encompasses the larger context of historical activities and environmental conditions, and potential future indirect and cumulative effects on soils, water, fish and wildlife from development. The Applicant, therefore, agrees to pursue an MOU with the Yakama Nation that will address the potential to monitor construction activity proximate to culturally sensitive areas of the site, will consider protocols to ensure ongoing protection of the site’s environmental resources, and any other issues of mutual concern to the parties.

Required Mitigation Measures

- Consultation with Department of Archaeology and Historic Preservation (DAHP) and Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) would continue.
- Compliance with all state regulations (e.g., RCW 27.44, RCW 27.53, SEPA) related to cultural resources would continue. This includes State law regarding the need for an Archaeological Site Alteration Permit from DAHP for any disturbance to archaeological sites with objects that pre-date the historic era (i.e., precontact archaeological sites) or disturbance to historic archaeological resources that are eligible for or listed in the NRHP. Alterations to a site can include adding fill, building on, removing trees, using heavy equipment on, compacting, or other activities that could change or potentially impact the site, as well as archaeological excavations.
- An inadvertent discovery plan would be adopted for the project and made available onsite during construction.

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

Significant Unavoidable Adverse Impacts

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

Parks & Recreation

Proposed Mitigation Measures (Included in the Project)

- ~~A total of approximately 477 acres of open space, including the Natural, Managed, and River Corridor Open Space areas, perimeter buffers, wetlands and their buffers, and on-site power easements, should be included in the project.~~ A total of approximately 553 acres of open space, including undeveloped open space (such as community/ recreation open space, stormwater open space, and steep slope areas and their buffers), wetlands and their buffers, and the powerline right-of-way, would be included in the project.
- ~~Three public trail parks totaling 1.5 acres and two Community Trail Parks totaling 1.0 acres should be provided.~~ A Trail Head Park totaling 6.0 acres, public trail parks totaling 2.0 acres, and private parks/pocket parks totaling 1.0 acres would be provided.
- ~~An approximate 6-acre adventure center open to residents and the public should be provided.~~

- ~~Two private recreational amenity centers totaling 11 acres should be provided, one in the RV resort and the other in the residential area.~~ Private recreational amenity centers totaling 11 acres would be provided in the RV resort and residential area.
- A 627-site RV resort, including recreational facilities, would be provided.
- An approximate five-mile trail system and one mile of sidewalks would be provided and would connect on-site development and link to off-site trails in several locations.

Bullfrog Flats Conditions of Approval (Included in the Project)

- The Applicant would support the City's efforts to obtain the necessary right-of-way or easement to construct an off-site connection from the 47° North site to the existing Coal Mines Trail and would contribute to the cost of the materials to construct the off-site trail connection.
- A 12-acre parcel would be dedicated to the city for future construction of a municipal (community) recreation center. This requirement has been satisfied. The municipal recreation center site and funding have already been dedicated to the city and the site is not part of the site of the Revised Proposal.

Required Mitigation Measures

- The proposed recreational uses would be generally consistent with the City of Cle Elum Parks and Recreation Plan and would meet or exceed the Plan's LOS goals/targets for active parks, open space, trails/tracks/connections, and associated facilities. No further mitigation is required.
- The specific locations and sizes of parks would be identified in the application and on the Master Site Plan in accordance with Parks and Recreation Targets/Goals in the City's Comprehensive Plan.

Significant Unavoidable Adverse Impacts

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

Transportation

An updated Transportation analysis was performed for the Revised Proposal to identify changes in background conditions since the SEIS and to reflect changes in the proposal. The

timing of some required improvements has changed but the extent of non-compliant intersections has not changed. Note that this sub-section incorporates substantial information from the Transportation report and accompanying section of the Addendum to facilitate review and decision making.

Table 1 identifies potential mitigation measures at the 11 study intersections that are anticipated to operate at a non-compliant LOS under future weekday summer PM peak hour conditions in 2025, 2031, or 2037 due to 'Baseline' conditions or the Revised Proposal project traffic. These are the same intersections that were forecast to operate at non-compliant levels with full buildout of SEIS Alternative 6 in the same years and peak period.

As in the Final SEIS, **Table 1** also identifies two different approaches to calculating pro-rata shares to fund the identified mitigating improvements. Method A (Solely Developer Responsibility) and Method B (Shared City/Developer Responsibility) are both presented. The alternative methodologies, which reflect different principles of engineering practice and SEPA policy, are discussed in greater detail in **Appendix C**. The pro-rata shares identified in **Table 1** have been updated to reflect the updated 'Baseline' traffic volumes at the six study intersections on Bullfrog Road, the updated trip generation of the Revised Proposal, and incorporation of the commercial parcel into the project.

As described in the Final SEIS, the specific form of mitigation, the pro-rata share cost of the mitigation, and the timing of the improvements will be evaluated and discussed by the Applicant, the city, and affected agencies and jurisdictions, including WSDOT, Kittitas County, and the City of Roslyn. The selected mitigation improvement for each affected intersection, pro-rata share methodology, and timing of the mitigation will be incorporated into conditions of approval and a new or updated Development Agreement between the Applicant and the City of Cle Elum. Improvement needs and mitigation will also be addressed in subsequent updates to the appropriate jurisdiction's transportation plans and capital improvement programs.

**Table 1
SUMMARY OF MITIGATION MEASURES AND PRELIMINARY ESTIMATED PRO-RATA SHARE – REVISED PROPOSAL**

Off-Site Study Intersection	Estimated Year Improvement Required (Forecast LOS)	Potential Improvement to Mitigate Weekday PM Peak Hour LOS Deficiency ¹	Estimated Pro-Rata Share			
			METHOD A ²		METHOD B ²	
			Background Share ³	47° North Share (Revised Proposal)	Background Share ³	47° North Share (Revised Proposal)
IMPROVEMENTS NEEDED FOR “BASELINE”/BACKGROUND CONDITIONS						
#2 – Bullfrog Road / I-90 WB Ramps ^{5, 6}	2037 (LOS D)	Compact Roundabout	n/a	n/a	82.9%	17.1%
#8 – Ranger Sta Rd / Miller Ave / W 2 nd St (SR 903)	2025 (LOS E)	Restrict Northbound and Southbound Left-Turns	68.7%	31.3%	68.7%	31.3%
#11 – Douglas Munro Blvd / W 1 st Street	2025 (LOS E)	Signalization ⁹	94.4%	5.6%	94.4%	5.6%
#12 – N Pine St / W 1 st Street	2025 (LOS D)	Compact Roundabout	95.5%	4.5%	95.5%	4.5%
#13 – N Stafford Ave / W 2 nd Street (SR 903)	2025 (LOS E)	Compact Roundabout ¹⁰	74.7%	25.3%	74.7%	25.3%
IMPROVEMENTS NEEDED FOR CONDITIONS WITH REVISED PROPOSAL ⁴						
By Year 2025:						
#7 – Denny Ave / W 2 nd Street (SR 903) ⁷	2025 (LOS D)	Restrict Northbound Left/Southbound-Left Turns	n/a	100%	64.1%	33.9%
#9 – N Pine Street / W 2 nd Street (SR 903)	2025 (LOS F)	Compact Roundabout	n/a	100%	69.9%	30.1%
#15 – N Oakes Ave / W 2 nd Street (SR 903)	2025 (LOS E)	Compact Roundabout	n/a	100%	78.4%	21.6%
By Year 2031:						
#1 – Bullfrog Road / I-90 EB Ramps	2031 (LOS F)	Compact Roundabout	n/a	100%	77.2%	22.8%
#3 – Bullfrog Road / Tumble Creek Dr ⁶	2031 (LOS F)	Refuge/merge lane on Bullfrog Rd	n/a	100%	78.0%	22.0%
#21 – Pennsylvania Ave / 1 st Street (SR 903)	2031 (LOS E)	All-Way Stop	n/a	100%	84.9%	15.1%
By Year 2037: ⁵						
N/A ⁸	--	--	--	--	--	--

Source: TENW, 2023.

¹ Improvement needed to mitigate non-compliant LOS during weekday PM peak hour; LOS results with mitigation are included in **Table 3.7-6**. WSDOT preference is a roundabout which is assumed unless identified otherwise.

² Estimated pro-rata share for 47° North is preliminary and will be adjusted based on a future Monitoring Program. The pro-rata share for Method A would be the full responsibility of 47° North for any improvements needed with the Revised Proposal. The pro-rata share for Method B would be shared between the background traffic and the Revised Proposal project traffic.

³ Share of future traffic volumes associated with ‘Baseline’/background traffic growth, excluding Revised Proposal.

⁴ Mitigation not triggered by ‘Baseline’ conditions but triggered by traffic generated by Revised Proposal.

⁵ The Revised Proposal is anticipated to be built out by 2031. Thus, the pro-rata share for Method A would not be applicable for intersection #2 which is estimated to be non-compliant in 2037 under the ‘Baseline’ scenario.

⁶ Non-compliant by Year 2037 with SEIS Alternative 6 in the *Final SEIS*.

⁷ Reported as non-compliant by Year 2031 with SEIS Alternative 6 in the *Final SEIS*.

⁸ No additional intersections would operate at non-compliant levels of service by 2037 with the Revised Proposal.

⁹ The City has plans to install a traffic signal at intersection #11.

¹⁰ The City has plans to install a compact roundabout at intersection #13.

To assist in identifying the type of appropriate improvements for study intersections that require mitigation and are within WSDOT's jurisdiction (i.e., SR 903 and Bullfrog Road at I-90 interchange), Intersection Control Evaluations (ICE) have been performed and technical reports have been submitted to WSDOT. Criteria addressed in the ICE documents include LOS operations, safety, right-of-way acquisition, engineering criteria and feasibility, and context for sustainable design. WSDOT has stated its preference for construction of compact roundabouts rather than traffic signals on SR 903.

Mitigation Measures for 'Baseline' Conditions

As shown in **Table 1**, five study intersections are anticipated to operate at a non-compliant LOS under future weekday summer PM peak hour 'Baseline' conditions (without the Revised Proposal). The City of Cle Elum has recently received grant funding to install a full traffic signal at study intersection #11 (Douglas Munro Boulevard /W 1st Street) and a compact roundabout at intersection #13 (N Stafford Avenue / W 2nd Street (SR 903)). However, no improvements are currently identified at the other three study intersections by the City of Cle Elum or WSDOT.

Potential improvements to mitigate non-compliant LOS at the other three study intersections under future weekday summer PM peak hour 'Baseline' conditions are identified in **Table 1** and include a compact (single-lane) roundabout or left-turn restrictions.

For the five intersections where improvements would be needed based on forecast 'Baseline' conditions, the 47° North project would contribute a pro-rata share towards intersection improvements because some additional traffic would be added by the project even though it would not trigger the improvement.

Mitigation Measures for Revised Proposal

As shown in **Table 1**, six study intersections are anticipated to operate at a non-compliant LOS due to the Revised Proposal in either 2025, 2031, or 2037 during the summer weekday PM peak hour in addition to those that are non-compliant in the Baseline (without project) condition.

Potential improvements to mitigate non-compliant LOS at the six study intersections under future weekday summer PM peak hour conditions with the Revised Proposal are identified in **Table 1** and include a compact (single-lane) roundabout, all-way stop control, roadway widening to add refuge/merge lanes, or left-turn restrictions.

The 47° North project would complete the intersection improvements or contribute a pro-rata share.

Mitigation Measures Identified in the SEIS Addendum vs in the Final SEIS

The Final SEIS identified the same 11 off-site study intersections included in **Table 1** that are forecast to operate at non-compliant LOS in future years 2025, 2031, or 2037 without or with full buildout of 47° North during the weekday summer PM peak hour.

The key differences between **Table 1** and the Final SEIS are:

- **#2 – Bullfrog Road / I-90 WB Ramps** is anticipated to operate at a non-compliant LOS under future 2037 ‘Baseline’ conditions instead of with SEIS Alternative 6 conditions.
- **#3 – Bullfrog Road / Tumble Creek Drive** is anticipated to operate at a non-compliant LOS under Revised Proposal conditions in 2025 instead of 2031.
- **#7 – Denny Avenue / W 2nd Street (SR 903)** is anticipated to operate at a non-compliant LOS under Revised Proposal conditions in 2031 instead of 2037.

Intersection LOS with Mitigation

To test the effectiveness of identified improvements, intersection LOS was evaluated with implementation of potential improvements identified in the updated analysis. These improvements would mitigate the 11 study intersections and two site access intersections that are anticipated to operate at non-compliant LOS under future weekday summer PM peak hour conditions. LOS analysis results for weekday, Friday, and Sunday summer PM peak hour conditions in 2031 with the Revised Proposal are summarized in **Table 2**.

As shown in **Table 2**, the potential improvements identified at the 11 off-site study intersections and two site access intersections are expected to improve conditions to compliant LOS at all intersections during the weekday and Friday summer PM peak hours. During the Sunday summer PM peak hour, the potential improvements are expected to improve conditions to compliant levels of service at the majority of intersections, with the following exceptions:

- **#7 – Denny Avenue / W 2nd Street (SR 903)**: with northbound and southbound left-turn restrictions, the off-site intersection is anticipated to operate at LOS D under the Revised Proposal in 2031 during the Sunday summer PM peak hour.
- **#8 – Ranger Station Road / Miller Avenue / W 2nd Street (SR 903)**: with northbound and southbound left-turn restrictions, the off-site intersection is anticipated to operate at LOS D under the Revised Proposal in 2031 during the Sunday summer PM peak hour.
- **#9 – N Pine Street / W 2nd Street (SR 903)**: as a compact roundabout, the off-site intersection is anticipated to operate at LOS E under the Revised Proposal in 2031 during the Sunday summer PM peak hour.
- **#30 – SR 903 / Main Access Road**: as a compact roundabout, the site access intersection is anticipated to operate at LOS F under the Revised Proposal in 2031 during the Sunday summer PM peak hour.

**Table 2
FUTURE YEAR INTERSECTION LOS SUMMARY WITH MITIGATION – REVISED PROPOSAL**

Location	Potential Improvement to Mitigate Weekday LOS Deficiency ¹	Weekday PM Peak Hour				Friday PM Peak Hour				Sunday PM Peak Hour			
		Mitigation Trigger		2031 With Project Mitigation		Mitigation Trigger		2031 With Project Mitigation		Mitigation Trigger		2031 With Project Mitigation	
		Year	Condition	LOS ²	Delay ²	Year	Condition	LOS ²	Delay ²	Year	Condition	LOS ²	Delay ²
Off-Site Study Intersection:													
#1 – Bullfrog Road / I-90 EB Ramps ⁶	Compact Roundabout	2031	Project	A	9.6	2025	Project	B	11.7	2037	Project	A	9.1
#2 – Bullfrog Road / I-90 WB Ramps ^{5, 6, 7}	Compact Roundabout	2037	'Baseline'	A	5.4	2031	'Baseline'	A	8.6	2037	Project	A	5.2
#3 – Bullfrog Road / Tumble Creek Dr ⁷	Refuge/merge lane on Bullfrog Rd	2031	Project	C	20.1	2037	Project	C	18.6	2031	Project	D	34.5
#7 – Denny Ave / W 2 nd Street (SR 903) ^{6, 8}	Restrict Northbound Left/Southbound-Left Turns	2025	Project	C	16.1	2025	Project	C	18.7	2025	Project	D	28.5
#8 – Ranger Sta Rd / Miller Ave / W 2 nd St (SR 903) ⁶	Restrict Northbound Left/Southbound-Left Turns	2025	'Baseline'	C	18.8	2025	'Baseline'	C	22.5	2025	'Baseline'	D	26.2
#9 – N Pine Street / W 2 nd Street (SR 903) ⁶	Compact Roundabout	2025	Project	A	7.7	2025	Project	B	11.5	2025	'Baseline'	E	56.6
#11 – Douglas Munro Blvd / W 1 st Street	Signalization ³	2025	'Baseline'	--	--	--	--	--	--	--	--	--	--
#12 – N Pine St / W 1 st Street	Compact Roundabout	2025	'Baseline'	A	7.4	2025	'Baseline'	A	8.1	2025	'Baseline'	A	7.6
#13 – N Stafford Ave / W 2 nd Street (SR 903) ⁶	Compact Roundabout ⁴	2025	'Baseline'	--	--	--	--	--	--	--	--	--	--
#15 – N Oakes Ave / W 2 nd Street (SR 903) ⁶	Compact Roundabout	2025	Project	A	3.7	2025	Project	A	3.9	2025	'Baseline'	A	5.9
#21 – Pennsylvania Ave / 1 st Street (SR 903) ⁶	All-Way Stop	2031	Project	C	20.5	2031	Project	C	22.5	2031	Project	B	14.5
Site Access:													
#28 – Bullfrog Road / RV Access Road	Compact Roundabout	2031	Project	A	10.0	2031	Project	C	19.6	2025	Project	D	31.8
#30 – SR 903 / Main Access Road	Compact Roundabout	2025	Project	B	17.3	2025	Project	C	32.8	2025	Project	F	>100

Source: TENW, 2023.

¹ Improvement needed to mitigate non-compliant LOS during weekday PM peak hour; WSDOT preference is a roundabout which is assumed unless identified otherwise; DASHES indicate LOS was not evaluated because improvements are funded and planned by the City.

² LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard.

³ The City has plans to install a traffic signal at intersection #11.

⁴ The City has plans to install a compact roundabout at intersection #13.

Site Access Mitigation Measures

The Revised Proposal would include new on-site roadways and intersections at its two access points with Bullfrog Road and its single access onto SR 903 (public roads). All on-site roads would be private and would be constructed and maintained by 47° North. The facilities would be constructed to City of Cle Elum standards, or standards that may be included in a new or updated Development Agreement. The Revised Proposal would also ensure that design of the new on-site roadways meets minimum requirements for emergency vehicle access and school bus access.

Based on the results of the weekday PM peak hour LOS analysis documented in Table 3.6-2 in **Appendix C** and the forecast LOS with proposed mitigation at the site access documented in **Table 2**, the traffic control at the new 47° North site access points on Bullfrog Road and SR 903 is proposed as follows:

- **#28 – Bullfrog Road / RV Access Road:** Proposed mitigation is a compact (single-lane) roundabout. (Note that this intersection was reported to operate at a compliant level of service in the Final SEIS, thus this is a new mitigation measure.)
- **#29 – Bullfrog Road / Main Access Road:** is anticipated to operate at complaint LOS during the weekday summer PM peak hour in 2025 and 2031 with the Revised Proposal as a side street stop-controlled intersection with the Main Access Road being stop-controlled.
- **#30 - SR 903 / Main Access Road:** Proposed mitigation is a compact (single-lane) roundabout.

Required Mitigation Measures

- Roadway design would conform with applicable requirements for vehicular access, including roadway width, adequate turning radius, fire hydrant access, provisions for vehicle back up, and weight bearing capacity.
- A secondary access would be provided when more than 30 single- or multi-family units are built, in accordance with the International Fire Code (IFC).

Other Possible Mitigation Measures

Traffic Monitoring Program

- The 47° North development should prepare and implement a traffic monitoring program as part of a new or updated Development Agreement. It is expected that the traffic monitoring program would be similar in format and function to the previously established program documented in the 2002 Development Agreement (Condition 92). The monitoring program would be coordinated with the city, in cooperation with Kittitas County and WSDOT, and would have the following objectives:
 - A. Document traffic volumes at key locations (roadways and/or intersections) in the local transportation network that would be impacted by traffic generated by the 47° North development;

- B. Separate traffic volumes at key locations by background traffic, 47° North development traffic, and traffic associated with development of the commercial property; and,
- C. Help establish or confirm the timing, location, and nature of required transportation improvements and consider the pro-rata share calculations.

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

Construction Management Plan

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

Trail System & Sidewalks

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

Significant Unavoidable Adverse Impacts

Proposed development under the SEIS Alternatives and the Revised Proposal would increase traffic volumes and congestion on area roadways (e.g., in the city, county, and on state facilities such as SR 903, SR 907, and I-90); this is an unavoidable effect of urban development. The LOS analysis indicates that several of the studied intersections would exceed LOS standards during the PM summer peak hours in the future analysis years with the additional traffic generated by the SEIS Alternatives and the Revised Proposal; some of these intersections would also exceed the LOS standards without the project due to continued growth in background traffic. The mitigation measures listed above would offset or reduce the significant adverse impacts under the SEIS Alternatives and the Revised Proposal.

Public Services

Proposed Mitigation Measures (Included in the Project)

- All the non-residential buildings would include sprinkler systems in case of fire. Fire hydrants would be provided throughout the residential areas.
- Traditional wood campfires would not be allowed within the RV resort.

Bullfrog Flats Conditions of Approval (Included in the Project)

- Mitigation measures for each public service provider would include execution of a separate mitigation agreement, where feasible, and a program to monitor actual calls for service, actual revenues and expenses, for affected providers. The program would, to the maximum extent possible, strive to time expenditures to when revenues are available and strive to time capital expenditures to when the jurisdiction has sufficient capacity to issue bonds for the improvements and sufficient tax revenue to service the debt. The program would also rely on shortfall mitigation payments to address any identified fiscal impacts, where applicable.
- Monitoring would track the number of service calls to affected providers at reasonable intervals to allow comparisons of actual and estimated calls and impacts. Any mitigation requirements would be adjusted accordingly to reflect actual impacts. Outreach and coordination between the Applicant and affected service providers is underway and is anticipated to result in mitigation agreements that will address impacts that are attributable to the Revised Proposal. Executed agreements will be included in a new or updated Development Agreement, if available.
- Site development would follow the Land Stewardship Plan (LSP) that is used for Suncadia, which includes provisions for fire-wising (e.g., thinning small trees, cutting limbs, raking debris and other fuel-reduction techniques to help prevent fires) during operation of the project. The LSP would be reviewed and updated, as necessary.
- Any emergency vehicle access, other than the public right of way would be coordinated with the City of Cle Elum Fire Marshall.

Required Mitigation Measures

- Worker safety measures would be implemented consistent with Occupational Safety and Health Administration (OSHA) and Washington Industrial Safety and Health Act (WISHA).
- A comprehensive construction plan would be developed. This plan would include, in part, a Fire and Life Safety plan, which would be consistent with the City of Cle Elum's adopted building code requirements for construction, a snow management plan,

designated emergency haul routes and access areas, and provisions for fencing and signing the construction site.

- Roadway design would conform with applicable requirements for vehicular access, including roadway width, adequate turning radius, fire hydrant access, provisions for vehicle back up, and weight bearing capacity to provide adequate emergency access to site.
- A secondary access would be provided when more than 30 single- or multi-family units are built, in accordance with the International Fire Code (IFC) to provide emergency access to the site.

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

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

Other Possible Mitigation Measures

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

Significant Unavoidable Adverse Impacts

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

Utilities

Proposed Mitigation Measures (Included in the Project)

- Recycling within the 47^o North development would be encouraged.

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

Water & Sewer

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

Solid Waste

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

Required Mitigation Measures

Water & Sewer

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

Projected water demand would be translated into actual consumption as the phases of development are constructed. The 2001 Water Supply System Project Development

Agreement between the City of Cle Elum and Trendwest (now New Suncadia) established “trigger” points when improvements would become necessary, including production thresholds for specified duration, or when a specified number of new connections are reached. Similar “trigger” points would be established for the three system components identified above.

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

Solid Waste

- The Applicant would handle all construction debris, separate re-cyclable materials, and otherwise handle all its solid waste and household hazardous waste consistent with the requirement for such handling in the Kittitas SWMP.
- ~~The Applicant would contribute a pro-rata share to construct improvements to the solid waste transfer station, consistent with the Kittitas County Solid Waste Management Plan (SWMP) Amendment for the Trendwest (now New Suncadia) Master Plan Resort and UGA (November 2000). The Applicant would handle all construction debris, separate re-cyclable materials, and otherwise handle all of its solid waste and household hazardous waste consistent with the requirement for such handling in the Kittitas SWMP. The same requirements would apply to the adjacent commercial development property, based on pro-rata share. Kittitas County Solid Waste will be consulted to determine the basis for any mitigation requirement and whether the 47° North development is responsible to mitigate impacts, and for its proportional contribution to improvements to the Cle Elum Transfer Station and the Ryegrass Landfill. Kittitas County supports its solid waste program through tipping fees (91%) and grants; project-based mitigation may not be applicable.~~

Significant Unavoidable Adverse Impacts

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

Fiscal & Economic Conditions

Economic Impacts

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

Fiscal Impacts

This section presents fiscal mitigation measures by taxing authority/entity to address the findings for the Revised Proposal. The updated Fiscal analysis did not conclude that mitigation measures would definitely be required for reasons discussed below. However, “Other Possible Mitigation Measures” have been identified to reflect uncertainties about the future that are inherent in any fiscal analysis. Note that this sub-section incorporates substantial information and discussion from the updated Fiscal report and the Public Services section of the Addendum; while this goes beyond mitigation measures, it is intended to provide a more complete picture of fiscal conditions and to facilitate review and decision making.

City of Cle Elum

The updated fiscal analysis focused on a calculation of net fiscal impacts of the Revised Proposal on the City of Cle Elum. Similar to SEIS Alternative 6, the analysis identified a fiscal surplus in 2037 with the Revised Proposal. For the Revised Proposal, the analysis identifies:

- A cumulative net surplus in year 2037 of \$2.9 million to cover police and fire costs; and,
 - An additional cumulative surplus of \$9.7 million in restricted revenues.
- Based on this analysis, mitigation for fiscal impacts of the Revised Proposal is not anticipated to be necessary to maintain the city’s fiscal solvency. However, these conclusions are projections based on assumptions, estimates and modeling of tax rates, estimates of public service demands, development conditions, and the performance of economic systems, and future monitoring is therefore recommended. Should future mitigation become necessary, the city should — consistent with typical municipal budgeting practices — consider imposing new taxes or fees to balance its budget or seek to change levels of public services to meet available revenues, or a combination of both approaches.

Other Service Purveyors

- While costs to serve 47° North could exceed tax revenues for the other public service purveyors considered in the analysis— including Hospital District No. 2, Hospital District No. 1, KITTCOM, and Cle Elum – Roslyn School District – mitigation is not certain to be

warranted. The updated Fiscal analysis only includes tax revenues, which provide only a portion of total revenues for the service purveyors and excludes other funding sources such as charges for service or intergovernmental revenues; these non-tax sources comprise a major source of revenues for the affected service providers.

Kittitas Hospital District No. 2

- Projected costs for Hospital District No. 2 would exceed property tax revenues alone. However, the District would also receive patient service fees, which were not included in the analysis. The analysis assumed that New Full Time Equivalent (FTE) employees could be added to meet service needs, and, therefore, as service needs grow, so too would patient service fees.
- Mitigation for FEIS Alternative 5 cited several criteria for consideration in a final mitigation agreement. It was noted that a future mitigation agreement should consider a fiscal monitoring program.
- The Hospital District could track property tax revenues and patient fees attributed the Revised Proposal and, should revenues not cover costs of service (over a certain period of time), a monthly mitigation payment could be made to the Hospital District to avoid fiscal shortfalls. A monitoring program by the Hospital District could inform future negotiations to mitigate a fiscal shortfall of the Revised Proposal, if any.

Kittitas Hospital District No. 1

- Projected costs for Hospital District No. 1 would not have any offsetting property taxes under the Revised Proposal since Cle Elum (and 47° North) is not within its taxing district. Like the situation for Hospital District No. 2, user fees are the primary basis for funding services. It is not clear on what basis mitigation would be appropriate for a development that is outside of the district taxing area and where patients would pay fees for the services provided.

KITTCOM

- Projected costs from the KITTCOM phone tax exceeded projected revenues for the Revised Proposal. Households within 47° North would contribute at the same level of per line charges as existing households within the district. It is reasonable to assume that intergovernmental revenues would scale up with growth in the city/county. Further, subscriber fees could reasonably be restructured to cover additional funding needs as underlying needs change.

Cle Elum - Roslyn School District

- Cumulative costs derived from projected new teacher FTE would exceed projected property tax revenues for operations under the Revised Proposal. However, the district would receive additional intergovernmental revenues which are expected to offset fiscal shortfalls, mainly through state support for schools funded by the state property tax.

- With respect to buses, only partial state and federal funding is provided to replace school buses. Some school districts in the state have responded by requesting transportation levies or by using other general funds to purchase buses. The need for additional school buses from student growth at 47° North will likely need to be similarly accommodated. To the extent that there are other facility related issues, the School District plans to develop an Early Childhood Learning Center in the future. This facility would help to address capacity issues in the district.

Other Possible Mitigation Measures

City of Cle Elum

- Implementation of a periodic fiscal monitoring program (e.g., in two to five-year increments) should also be considered following buildout in view of the uncertainties in the fiscal analysis. Fiscal monitoring could reasonably occur during buildout as well; however, revenues may lag behind costs resulting in an incomplete picture of the impact. Fiscal monitoring could be particularly helpful as costs and revenues associated with the Revised Proposal could impact the city’s overall fiscal situation. Additionally, the Addendum assumes the city’s Fire Department will move to full time employment and away from its current model of service. Furthermore, future negotiations should consider the measures proposed in the Approved Bullfrog Flats Development Agreement. That agreement identified several conditions to mitigate fiscal shortfalls and to ensure existing citizens and ratepayers would not suffer negative financial impacts as a result of the development. Conditions cited that Trendwest (now New Suncadia) would: allow a Municipal Facilities and Services Expansion Plan to guide capital expansions; make fiscal shortfall mitigation payments; pay for the development’s share of planning, water/wastewater treatment plant construction, and permit fees; and coordinate security forces with police and fire services (note that the water/wastewater treatment plant has since been built).
- The fiscal monitoring consultant will need the following information to assure that all taxes due to the city are properly reported and collected:
 - **Property Taxes.** The consultant will need information from the county assessor that detail new construction value and assessed value for all 47° North tax parcels.
 - **Sales Taxes.** The city will have to work with the Washington State Department of Revenue to request individual tax reports for businesses and households. If these data are not available to the fiscal monitoring consultant due to data privacy restrictions, the consultant will have to work with publicly available retail sales data to apportion city receipts to 47° North.
 - **Utility Taxes.** Due to the mix of utility providers, the consultant will have to work with publicly available utility tax data to apportion city receipts to 47° North.
 - **Real Estate Excise Taxes.** The consultant will need information from the county assessor to summarize real estate transactions within 47° North.

Other Service Purveyors

- The Applicant should, and has committed to, pursue mitigation agreements with the affected service providers to address fiscal impacts, if any, resulting from increased service demands attributable to the Revised Proposal.
- Similar to existing agreements between Trendwest (now New Suncadia) and the School District (e.g., the December 2001 Letter to the District from Trendwest and the January 2003 School Mitigation Agreement between Trendwest and the School District), a School Mitigation Agreement could be executed between the Applicant and the district that would:
 - Reimburse the district for the costs of starting up and maintaining a system to account for student enrollment related to the 47° North project;
 - Contribute to the costs of portables attributable to the project; and
 - Contribute to the costs of buses attributable to the project.

Significant Unavoidable Adverse Impacts

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

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