

SEPA Supplemental Environmental Impact Statement
ADDENDUM

for the

**Revised 47° North
Major Site Plan Amendment Proposal**



prepared by

**City of Cle Elum,
Planning Department**

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*EA Engineering, Science, and Technology, Inc., PBC
ESM Consulting Engineers
Yakama Nation Cultural Resources Program
Transportation Engineering Northwest
ECONorthwest*

TABLE of CONTENTS

	<i>Page</i>
CHAPTER 1 – SUMMARY	1-1
CHAPTER 2 – PROJECT DESCRIPTION	2-1
CHAPTER 3 – NEW INFORMATION & ANALYSIS	3.0-1
A. Natural Environment	3.0-6
B. Built Environment	
1. Land Use / Plans & Policies.....	3.1-1
2. Aesthetics / Light & Glare	3.2-1
3. Housing, Population, & Employment	3.3-1
4. Cultural Resources	3.4-1
5. Parks and Recreation	3.5-1
6. Transportation	3.6-1
7. Public Services.....	3.7-1
8. Utilities.....	3.8-1
9. Fiscal Conditions	3.9-1
CHAPTER 4 – REFERENCES	
APPENDICES	
A. <i>Natural Environment Memos</i>	
B. <i>Utilities Report</i>	
C. <i>Transportation Report</i>	
D. <i>Hospital District No. 2 Call Data</i>	
E. <i>Fiscal Conditions Report</i>	
F. <i>Mitigation Measures & Significant Unavoidable Adverse Impacts</i>	

LIST of FIGURES

<i>Figure</i>	<i>Page</i>
2-1 Regional Map	2-4
2-2 Vicinity Map	2-5
2-3 Boundary Map – Revised Proposal	2-6
2-4 Master Site Plan – Revised Proposal	2-9
2-5 Main Access Road Cross Section.....	2-14
3.9-1 Summary of Kittitas Hospital District #2 Revenues	3.9-8

LIST of TABLES

<i>Table</i>	<i>Page</i>
1-1 Summary Comparison – SEIS Alt. 6 and Revised Proposal	1-4
1-2 Impact Summary Table	1-6
1-3 Summary of Mitigation Measures & Preliminary Estimated Pro-Rata Share – Revised Proposal	1-23
1-4 Future Year Intersection LOS Summary with Mitigation – Revised Proposal	1-26
2-1 Land Use Summary Comparison – SEIS Alt. 6 & Revised Proposal	2-7
2-2 Commercial Development Assumptions – SEIS Alt. 6 & Revised Proposal	2-12
3.3-1 Permanent Housing, Population & Employment – SEIS Alt. 6 & Revised Proposal	3.3-1
3.3-2 Estimated Commercial Area Employees – Revised Proposal	3.3-7
3.5-1 Required & Proposed Park & Recreation Facilities	3.5-2
3.6-1 Trip Generation Comparison – SEIS Alt. 6 & Revised Proposal.....	3.6-4
3.6-2 Intersection LOS Summary – Weekday PM Peak Hour (Summer) Revised Proposal	3.6-6
3.6-3 Roadway Weekday Peak Hour Volume and Level of Service	3.6-8
3.6-4 Site Access LOS Summary – SEIS Alt. 6 & Revised Proposal	3.6-10
3.6-5 Summary of Mitigation Measures & Preliminary Estimated Pro-Rata Share – Revised Proposal	3.6-12
3.6-6 Future Year Intersection LOS Summary with Mitigation - Revised Proposal	3.6-15
3.7-1 Cle Elum-Roslyn School District Student Enrollment Projections.....	3.7-3
3.7-2 Residential Population – SEIS Alts. 5 and 6, and Revised Proposal	3.7-6
3.7-3 Public Service Demands – SEIS Alts. 5 and 6, and Revised Proposal	3.7-7
3.7-4 Revised Proposal Hospital District No. 1 Staff Needs – Alternative Population-Based Ratio	3.7-10
3.8-1 Construction & Demolition Debris Generation Summary – Revised Proposal and SEIS Alts. 5 and 6	3.8-2
3.8-2 Average Daily Treated Water Demands – Revised Proposal and SEIS Alts. 5 and 6	3.8-3
3.8-3 Maximum Month Treated Water Demands – Revised Proposal and SEIS Alts. 5 and 6	3.8-3
3.8-4 Monthly Wastewater Flow – Revised Proposal and SEIS Alts. 5 and 6.....	3.8-5
3.8-5 Project Wastewater Loadings – Revised Proposal and SEIS Alts. 5 and 6	3.8-5
3.8-6 Solid Waste Production – Revised Proposal and SEIS Alts. 5 and 6	3.8-6
3.9-1 Summary of Cost Impacts for Cle Elum – Revised Proposal	3.9-5

3.9-2	Summary of Revenue Impacts for Cle Elum – Revised Proposal.....	3.9-6
3.9-3	Surplus/Deficit of Costs and Revenues for Cle Elum – Revised Proposal.....	3.9-7

Chapter 1

SUMMARY

CHAPTER 1

INTRODUCTION & SUMMARY

1.1 Introduction

Prior Permitting & Environmental Documentation

This SEIS Addendum is the third environmental document prepared by the City of Cle Elum, as lead agency, pursuant to the State Environmental Policy Act (SEPA), for proposed development of a Master Site Plan for a site generally referred to as the Bullfrog Flats/Urban Growth Area (UGA) property. In 2002, an Environmental Impact Statement (EIS) was prepared to evaluate annexation by the city and development by Trendwest Resorts (now New Suncadia) of the approximate 1,100-acre site. That EIS evaluated five development alternatives. The preferred Master Site Plan (EIS Alternative 5) was approved by the city subject to numerous conditions; a Development Agreement was also approved. Trendwest did not proceed with development.

In 2020, Sun Communities acquired the Bullfrog Flats property and submitted an application to modify the approved master plan and to develop the site with a different mix of land uses. A Supplemental EIS (SEIS) was prepared to evaluate Sun Communities' proposal in 2020 (Draft SEIS) and 2021 (Final SEIS). The SEIS updated information about background conditions, including information relevant to the approved Master Site Plan (Alternative 5), and compared the impacts of Sun Communities' modified master plan proposal to the approved master plan. In 2022, Sun Communities withdrew its original application and continued to evaluate plans for development of the property. The Applicant provided updated information to the city about its revised proposal and that information is the basis for the analysis in this Addendum.

SEPA Addendum

This document is an Addendum to the *47° North Master Site Plan Amendment Final SEIS* (2021); it documents and evaluates impacts associated with the Revised 47° North Master Site Plan Amendment (Revised Proposal). The Addendum updates and adds information about the alternatives, impacts, and mitigation measures identified in the prior SEIS in light of the changes in the Revised Proposal. Pursuant to the SEPA rules, an Addendum is appropriate when a proposal has been modified but the impacts of the changes are within the range of impacts and alternatives identified in existing environmental documents (WAC 197-11-600(3)(b)(ii)).

The Revised Proposal is substantially similar to the project evaluated in the SEIS (Alternative 6) in most respects. Proposed changes are the impetus for and the focus of the

reevaluations in this Addendum. The most substantial changes in the Revised Proposal include the following:

- addition of 50 units of affordable, multi-family housing. The units would be constructed and maintained by the Applicant and dispersed on the project site. A condition of approval adopted in 2002 required the developer to dedicate a 7.5-acre site to the city, which would be developed for 50 units of affordable housing and maintained by a third party developer;
- incorporation of the 25-acre, 150,000-square foot commercial center into the Revised Proposal. The commercial center was not part of the original Sun Communities Master Site Plan proposal. Although the SEIS considered future, possible development of the commercial center by a different property owner as speculative, it nevertheless evaluated future development to provide a complete picture of possible cumulative impacts; and
- a change in the timing of development of the Master Site Plan to affect an earlier buildout of the overall project — 2028 for residential and RV uses, and 2031 for the commercial center.

Other differences between the SEIS Proposal (SEIS Alternative 6) and the Revised Proposal include minor changes to the mix of land uses in the commercial center, but no change in the total amount of commercial development; and minor changes to some details of the site plan, such as the location of types of on-site parks. The amount of open space provided in the Revised Proposal has been increased. All on-site roads, parks, and utilities would now be owned, constructed, and maintained by the Applicant rather than the city.

Information about existing conditions, particularly regarding transportation, public services, and fiscal conditions, has been updated to reflect any new information about impacts or changes in background conditions that have occurred since publication of the SEIS and that could affect previous conclusions. The Addendum reevaluates and compares potential impacts accordingly.

All SEPA elements of the environment evaluated in the SEIS have been reconsidered in light of the Revised Proposal. As documented in the Addendum, changes in impacts relative to those identified in the SEIS are incremental in nature and are within the range of impacts and alternatives considered in the prior environmental documents prepared for or bearing on the Revised Proposal. No impacts that are significantly different in type or degree have been identified.

The reader should note that the Addendum is focused on comparing the impacts of the Revised Proposal to the 2020/2021 Master Site Plan amendment that was evaluated in the SEIS (SEIS Alternative 6). That is the function and focus of an Addendum as defined in the SEPA Rules. The context of the prior SEIS, however, was to compare the 2020/2021 Sun

Communities master plan proposal to the approved Bullfrog Flats Master Site Plan evaluated in the original/2002 EIS (Alternative 5). To avoid unnecessary repetition, the Addendum refers to and summarizes information contained in the SEIS that is being reevaluated, including that related to Alternative 5 (the preferred master plan in the 2002 EIS), but it does not repeat the prior analysis. Together, the three environmental documents prepared for the various proposals and alternatives for development of the site provide a thorough disclosure and comparison of significant impacts and measures to mitigate those impacts.

The Addendum is organized similarly to the SEIS. **Chapter 1** is an introduction and summary of the Revised Proposal, identified impacts, and mitigation measures. Mitigation measures include any new measures applicable to the Revised Proposal. **Chapter 2** describes the Revised Proposal in detail. **Chapter 3** contains the updated environmental analysis. **Appendices** include technical reports and memoranda for engineering/utilities, transportation, fiscal impacts, and for elements of the natural environment. Note that the Yakama Nation Cultural Resource Program prepared an analysis of the portion of the site proposed for the commercial center. That report has been submitted to the Department of Archaeology and Historic Preservation and the conclusions are summarized in the Addendum; however, state law does not permit disclosure of the full report.

1.2 Site Area

The Revised Proposal site is approximately 889 acres in size, about 65 acres larger than the site under SEIS Alternative 6 (and 211 acres smaller than the approved 2002 Bullfrog Master Plan site). The difference in site area under the Revised Proposal is due to the addition of the commercial property to the eastern part, addition of open space to the southern part, and removal of the municipal recreation center property from the northern part (previously dedicated to the City) and a road dedication from the southern part of the site (see **Chapter 2** for details).

1.3 Revised Proposal & SEIS Alternatives

The Revised Proposal is Sun Communities' current (2023) proposal for the 47° North site. Two alternatives were studied in the SEIS: SEIS Alternative 5, the Approved Bullfrog Flats Master Site Plan (the No Action Alternative), updated to reflect current conditions and regulations; and SEIS Alternative 6, the proposed 47° North Master Site Plan Amendment (the Applicant's proposal at the time). Highlights of the Revised Proposal and SEIS Alternative 6 are shown in **Table 1-1**. A detailed description of the Revised Proposal, including significant differences between the prior and current proposals, is contained in **Chapter 2** of this SEIS Addendum.

Table 1-1
SUMMARY COMPARISON - SEIS ALTERNATIVE 6 & REVISED PROPOSAL

Land Use	SEIS Alternative 6	Revised Proposal
Residential	<ul style="list-style-type: none"> • 150.1 ac. • 707 residential units <ul style="list-style-type: none"> ○ 527 single family units ○ 30 multi-family units ○ site for future affordable housing 	<ul style="list-style-type: none"> • 144.9 ac. • 757 residential units <ul style="list-style-type: none"> ○ 527 single family units ○ 30 multi-family units ○ 50 affordable housing units
RV Resort Sites	<ul style="list-style-type: none"> • 145.5 ac. • 627 RV sites 	<ul style="list-style-type: none"> • 125.8 ac. • 627 RV sites
Active Parks	<ul style="list-style-type: none"> • 19.5 ac. <ul style="list-style-type: none"> ○ public adventure center, private amenity centers, private parks 	<ul style="list-style-type: none"> • 20.0 ac. <ul style="list-style-type: none"> ○ public trailhead park, private amenity centers, public parks
Open Space	<ul style="list-style-type: none"> • 477 ac. (58% of site) 	<ul style="list-style-type: none"> • 553 ac. (62% of site)
Cemetery Expansion Site	<ul style="list-style-type: none"> • 13.0 ac. 	<ul style="list-style-type: none"> • 13.0 ac.
Municipal Recreation Center Site	<ul style="list-style-type: none"> • 12.0 ac. 	<ul style="list-style-type: none"> • N/A, dedicated to City
Commercial	<ul style="list-style-type: none"> • 25.0 ac., not part of project <ul style="list-style-type: none"> ○ 150,000 sq. ft. of possible grocery, retail, restaurant, medical office uses 	<ul style="list-style-type: none"> • 25.0 ac., part of project <ul style="list-style-type: none"> ○ 150,000 sq. ft. of possible grocery, retail, restaurant, office uses

Source: Sun Communities, 2022.

1.4 Impacts

This subsection includes a summary of the key impacts that would potentially result from construction and operation of the Revised Proposal and SEIS Alternative 6. **Table 1-2**, below, provides greater detail on the significant impacts of the SEIS Alternatives. Note that this summary information is not intended to be a substitute for the complete discussion of each element that is contained in **Chapter 3** (and the SEIS) and should not be relied on by readers to make judgements about the completeness or sufficiency of the discussion in the Addendum. Overall, differences between the Revised Proposal and SEIS Alternative 6 and their respective impacts are minor.

Summary of Key Impacts

The Addendum's conclusions about impacts of the Revised Proposal are highlighted below; note that impact comparisons are relative to SEIS Alternative 6.

Natural Environment

The Revised Proposal would result in:

- less grading and associated potential for erosion and sedimentation;

- no significant impacts to geologic hazards, mostly because development would be located outside of these areas (same as SEIS Alternative 6)
- less impervious surface area and potential for pollution and other impacts on surface and groundwater;
- no direct impacts to water resources, including the Cle Elum River and on-site wetlands and their buffers (same as SEIS Alternative 6);
- adequate water supply through existing water rights to serve the project (similar to SEIS Alternative 6); and
- a larger percentage of the site maintained in open space.

Land Use /Visual Change

The Revised Proposal would result in:

- conversion of a vacant, largely forested site to urban mixed-use development; this change is consistent with its location in the Cle Elum UGA and mixed-use zoning, and almost identical to SEIS Alternative 6;
- no significant land use conflicts considering the proposed layout of land uses, proposed open space and buffers incorporated into the site plan, and existing physical barriers within and adjacent to the site; overall, similar to SEIS Alternative 6;
- similar density/intensity of residential and commercial development;
- development of an RV resort, almost identical to SEIS Alternative 6;
- construction activities could be visible or noticeable from surrounding roadways but would occur over a shorter buildout period;
- views of on-site development and visual change would be limited or blocked by preserved vegetation and topography, similar to SEIS Alternative 6;
- new light sources occurring onsite, including the RV resort, particularly during the peak visitor season, similar to SEIS Alternative 6; and
- new light sources onsite that would be limited or obscured by preserved vegetation and topography and implementation of Dark Sky provisions, similar to SEIS Alternative 6.

Public Infrastructure, Services, & Facilities

The Revised Proposal would result in:

- slightly more additional permanent population than SEIS Alternative 6 but less than SEIS Alternative 5; the same temporary RV visitor population as Alternative 6;
- incrementally greater demand for public services and associated facilities (police, fire/EMS, emergency dispatch, hospitals, and schools) compared to SEIS Alternative 6 due primarily to an incrementally larger permanent population; as with SEIS Alternative 6, the RV visitor population would not impact schools; as with SEIS Alternative 6, mitigation agreements should be pursued with service providers to address probable deficiencies;
- similar reduction as for SEIS Alternative 6 in potential construction-related traffic impacts, such as the number of truck trips, due to the manufacturing of homes offsite and less grading/hauling);

- an increase in traffic volumes and congestion on area roadways requiring improvements to certain intersections (similar to SEIS Alternative 6); and
- demand for water, sewer and solid waste service, exceeding water and solid waste facility capacity (similar to SEIS Alternative 6).

Economic & Fiscal Conditions

The Revised Proposal would result in:

- an estimated 400 new permanent and seasonal employees at the commercial development and RV resort at full buildout of the Revised Project, similar to SEIS Alternative 6;
- an estimated cumulative net general revenue surplus of \$2.7 million for the City of Cle Elum by year 2031 (buildout), plus a cumulative \$5.3 million in restricted revenues; and
- as with SEIS Alternative 6, costs would exceed revenues for certain of the special districts if tax revenues alone are considered, but user charges, intergovernmental revenues or other sources comprise a substantial portion of special district revenues and have historically been scaled upward to balance costs; shortfalls would be addressed through mitigation agreements, where appropriate.

**Table 1-2
IMPACT SUMMARY TABLE**

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
3.0 EARTH		
<ul style="list-style-type: none"> SEIS Alternative 5 would result in approximately 403 acres of clearing onsite. SEIS Alternative 5 would require approximately 644,000 CY of cut and 420,000 CY of fill. All on-site areas classified as erosion, steep slope, and landslide hazard areas would be located outside developed areas. Low risk of liquefaction during seismic events, as well as the risk of coal mine hazard and subsidence of underground mine workings. 	<ul style="list-style-type: none"> SEIS Alternative 6 would result in approximately 315 acres of clearing onsite. SEIS Alternative 6 would require approximately 351,000 CY of cut and 310,000 CY of fill. Impacts to geotechnical hazards (erosion, steep slope, landslide, seismic, and coal mine) would be similar. 	<ul style="list-style-type: none"> Impacts to earth, including geotechnical hazards, would be similar to or less than SEIS Alternative 6 and less than SEIS Alternative 5.
3.0 WATER QUANTITY & QUALITY		
<ul style="list-style-type: none"> Clearing and grading operations could result in erosion and sedimentation of surface water runoff, and could also deliver fine sediments, accidental spills of petroleum products, and/or construction waste to the Cle Elum River by way of the underlying alluvial aquifer. Sufficient water rights are available to serve SEIS Alternative 5, as well as full buildout of Suncadia, and significant impacts to water supply are not anticipated. 	<ul style="list-style-type: none"> Less potential for erosion and sedimentation, and other pollution of surface waters because there would be less clearing and development onsite. Temporary stormwater management would comply with current regulations. Like SEIS Alternative 5, sufficient water rights are available to serve SEIS Alternative 6 and Suncadia. However, the fewer residential units and reduced commercial development that would result in less domestic water use. 	<ul style="list-style-type: none"> Impacts to water quality and quantity would be similar to or less than SEIS Alternative 6 and incrementally less than SEIS Alternative 5 due to less impervious surface area. Sufficient water rights are available. Incrementally greater domestic water use than SEIS Alternative 6.
3.0 PLANTS, ANIMALS, & WETLANDS		
<ul style="list-style-type: none"> A total of 524 acres (48% of the site) would be retained in largely forested open space under SEIS Alternative 5 The 2020 SEIS identified a new wetland (Wetland 6). SEIS Alternative 5 site plan would impact Wetland 6 and its buffer. SEIS Alternative 5 would result in the displacement of wildlife and wildlife habitat within development areas but would not substantially affect threatened, endangered, sensitive or priority wildlife species. 	<ul style="list-style-type: none"> A total of 477 acres (58% of the site) would be retained in largely forested open space under SEIS Alternative 6. SEIS Alternative 6 would result in no direct impacts to wetlands and their buffers. Like SEIS Alternative 5, SEIS Alternative 6 would result in displacement of wildlife and habitat, but would not substantially affect endangered, threatened, sensitive or priority wildlife species. 	<ul style="list-style-type: none"> A total of 553 acres (62% of the site) would be retained in open space under the Revised Proposal. There would be no direct impacts to wetlands and their buffers. Impacts to wildlife and habitat would be similar to or incrementally less than SEIS Alternatives 5 and 6.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
3.0 AIR QUALITY		
<ul style="list-style-type: none"> Demolition and construction would generate dust and emissions from construction activities over the 30-year buildout. Tailpipe emissions would be the major source of air pollution under SEIS Alternative 6. SEIS Alternative 5 would generate approximately 44,753 metric tons of CO₂e per year by 2037 and 72,368 metric tons of CO₂e per year by 2051. The GHG emissions increase would be only a small fraction (0.04%) of total statewide annual GHG emissions and no single project emits enough GHG emissions to solely influence global climate change. 	<ul style="list-style-type: none"> Dust and other emissions would occur at a reduced level compared to SEIS Alternative 5 due to fewer residential units and a shorter buildout period. Tailpipe emissions would be the major source of air pollutants but are anticipated to be less than SEIS Alternative 5. SEIS Alternative 6 is estimated to generate less GHG emissions, 35,719 metric tons of CO₂e per year by 2037, and would represent a slightly smaller percentage of statewide annual GHG emissions. 	<ul style="list-style-type: none"> Air quality impacts would be similar to SEIS Alternative 6 and incrementally less than SEIS Alternative 5, primarily due to project traffic. Tailpipe emissions would be the major source of air pollutants but are anticipated to be less than SEIS Alternative 5 and slightly more than SEIS Alternative 6. The Revised proposal would generate less GHG emissions than SEIS Alternative 6, and a similar amount of emissions as SEIS Alternative 6.
NOISE		
<ul style="list-style-type: none"> The primary source of operational noise would be vehicle traffic on local roadways. Increases in noise levels would range from one to four dBA (below WSDOT's threshold of 10 dBA). Noise levels exceeding WSDOT's threshold of 66 dBA were modeled to occur at two residential receivers and the existing cemetery. Residential and business park uses would also generate noise. Temporary increases in noise from construction equipment and vehicle traffic and could result in temporary localized impacts to adjacent land uses. 	<ul style="list-style-type: none"> Vehicle traffic would be the primary source of noise; the differences in modeled noise between SEIS Alternative 6 and Alternative 5 would be negligible. Increases in noise from proposed land uses would be less than SEIS Alternative 5 due to less development. Construction noise and any associated impacts on adjacent land uses would be less than SEIS Alternative 5 due to less onsite construction and faster buildout. 	<ul style="list-style-type: none"> Noise impacts would be similar to SEIS Alternative 6 and incrementally less than SEIS Alternative 5, primarily due to less project traffic.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
3.1 LAND USE		
<ul style="list-style-type: none"> SEIS Alternative 5 would convert the existing undeveloped, largely forested site to a mix of intensive urban residential uses (1,334 housing units) and business park uses (950,000 sf). Development of 10 acres of commercial uses is also possible. Residential density would be 6.0 DU/acre. The site layout, open space/buffers, and existing physical barriers within and adjacent to the site under SEIS Alternative 5 would limit conflicts with adjacent land uses. New residents under SEIS Alternative 5 would create additional demand for goods and services, which could cause pressure for off-site commercial development. 	<ul style="list-style-type: none"> SEIS Alternative 6 would convert the site to a mix of urban residential (707 housing units) and commercial uses (potential 150,000 sq. ft. on an adjacent site by a different owner) and an RV resort (627 sites); total development would be substantially less than SEIS Alternative 5. Residential density with 4.9 DU/acre, lower than SEIS Alternative 5. Land use conflicts are not anticipated due to the proposed site layout, the amount and location of open space/buffers, and existing physical barriers within and adjacent to the site. Compared to SEIS Alternative 5, the smaller permanent and seasonal population together would generate less demand for goods and services; potential development of commercial uses adjacent to the site would absorb some demand and diminish pressure for commercial development off-site. 	<ul style="list-style-type: none"> Total development would be incrementally greater than SEIS Alternative 6 and significantly less than SEIS Alternative 5. The Revised Proposal would include 50 additional residential units, the same number of RV sites, and the same amount of commercial development as SEIS Alternatives 6. Affordable units would be provided and dispersed on-site, compared to provision of land for future development for SEIS Alternative 5 or 6. Residential density would be similar to SEIS Alternative 6. Residential density would be less than SEIS Alternative 5, and similar to SEIS Alternative 6. Land use conflicts are not anticipated. The Revised Proposal would generate demand for goods and services, similar to SEIS Alternative 6 and less than SEIS Alternative 5.
3.1 RELATIONSHIP TO PLANS & POLICIES		
<ul style="list-style-type: none"> Development under SEIS Alternative 5 would be generally consistent with relevant Washington State, Kittitas County, City of Cle Elum, and neighboring city/town (e.g., Roslyn, Ronald, South Cle Elum) plans, policies, and regulations. 	<ul style="list-style-type: none"> Development under SEIS Alternative 6 would be generally consistent with relevant Washington State, Kittitas County, City of Cle Elum, and neighboring city/town plans, policies, and regulations. 	<ul style="list-style-type: none"> Similar to SEIS Alternative 6, development under the Revised Proposal would be generally consistent with relevant plans, policies, and regulations.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
3.2 AESTHETICS/LIGHT & GLARE		
<ul style="list-style-type: none"> The primary visual impact would be the conversion of forested area to residential neighborhoods and commercial uses. Vegetated buffers on the perimeter of the site would minimize visual impacts from surrounding areas. Development would be most visible from higher vantage points. New light sources would be introduced to the site (including building and landscape lighting, and additional lights from vehicle traffic) and would increase the amount of visible light during the evening hours. Vegetated buffers and other mitigation (e.g., Dark Sky provisions) would minimize lighting impacts. 	<ul style="list-style-type: none"> Impacts would be similar to SEIS Alternative 5 in type but lesser in degree due to preservation of greater open space. The proposed site layout, preserved vegetated buffers, existing landforms, and distance to development would avoid or minimize visual impacts from surrounding areas. Development would be most visible from higher vantage points. New light sources would occur on the site but would be less than SEIS Alternative 5 due to less development. Vegetated buffers and other mitigation would minimize lighting impacts. 	<ul style="list-style-type: none"> Visual impacts under the Revised Proposal would be similar to SEIS Alternative 6 and less than SEIS Alternative 5. Lighting impacts would be similar to SEIS Alternative 6 and less than SEIS Alternative 5.
3.3 HOUSING, POPULATION, & EMPLOYMENT		
<ul style="list-style-type: none"> Under SEIS Alternative 5, the following approximate housing, population, and employment would be generated by buildout in 2051: <ul style="list-style-type: none"> 1,334 housing units 2,809 permanent residents 1,900 employees (mostly from business park) A 7.5-acre site would be set aside for dedication and future development of affordable housing by others under SEIS Alternative 5. The housing under SEIS Alternative 5 is expected to largely be market rate. Construction of SEIS Alternative 5 would occur through a combination of local and non-local construction which would result in some workers moving to the area temporarily and/or permanently. The largest demand for construction workers 	<ul style="list-style-type: none"> Under SEIS Alternative 6, the following approximate housing, population, and employment would be generated by buildout in 2037: <ul style="list-style-type: none"> 707 housing units 1,489 residents 400-425 employees 627 RV sites and a conservative, hypothetical “proxy” population of 941 is used to estimate some types of impacts (see section 3.7). An approximate 6.8-acre site would be set aside for development by others of future affordable housing. Based on preliminary estimates, housing would be financially accessible but would not be considered affordable to local residents earning 60% or less of area Median Household Income. Demand for local construction workers would be less because housing would be constructed offsite and assembled onsite, and less overall development would occur onsite and be developed in a shorter period. 	<ul style="list-style-type: none"> Under the Revised Proposal, the following approximate housing, population and employment would be generated by buildout: <ul style="list-style-type: none"> 757 housing units 1,579 residents 400-425 employees 627 RV sites; a conservative, hypothetical “proxy” population of 941 is used to estimate some types of impacts (see section 3.7). 50 affordable housing units would be integrated and dispersed on-site with the Revised Proposal. Demand for local construction workers would be similar to SEIS Alternative 6 but less than SEIS Alternative 5 because housing would be manufactured off-site.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
would occur during the first five years of construction.		
3.4 HISTORIC & CULTURAL RESOURCES		
<ul style="list-style-type: none"> 23 cultural resource sites were identified in the project area in the 2002 Cle Elum UGA EIS. Most of the sites are located in the lower third of the site that would be reserved for open space, while development would occur in the upper two thirds of the site. A conservation easement would also protect areas adjacent to the Cle Elum River. Potential impacts to known cultural resources under SEIS Alternative 5 are not expected to be significant because on-site archaeological sites identified in 2002 have since been determined to be not eligible for listing on the National Register of Historic Places (NRHP) or Washington Historic Register (WHR). Unidentified cultural resources could potentially be inadvertently impacted or destroyed with site development under SEIS Alternative 5. 	<ul style="list-style-type: none"> The same areas would be preserved in open space and protected by an easement. Like SEIS Alternative 5, potential impacts to cultural resources are not expected to be significant because known archaeological sites that are located onsite have been determined to be not eligible for listing on the NRHP or WHR. Like SEIS Alternative 5, unidentified cultural resources could be impacted or destroyed by site development under SEIS Alternative 6. 	<ul style="list-style-type: none"> Identified resource sites would be contained in open space areas and protected by an easement. Similar to SEIS Alternatives 5 and 6, potential impacts to cultural resources are not expected to be significant. Similar to SEIS Alternatives 5 and 6, unidentified cultural resources could be impacted by site development.
3.5 PARKS & RECREATION		
<ul style="list-style-type: none"> Increased population under SEIS Alternative 5 would result in increased demand for park and recreation facilities in Cle Elum and the site vicinity. A range of recreational facilities would be provided onsite to help meet demand, including: parks, trails, a neighborhood clubhouse, lake, and two soccer fields. During development of SEIS Alternative 5, non-local construction workers could choose to live in local RV campgrounds, which would reduce the number of sites available for recreational users. 	<ul style="list-style-type: none"> Demand for parks and recreation facilities would be less due to fewer permanent residents. Resort visitors to the RV resort would also contribute to increased demand but resort facilities would absorb a portion of demand. A range of recreational facilities would be provided onsite, including: parks, trails, an adventure center, and two recreation amenity centers. These facilities would meet or exceed Comprehensive Plan targets. Less development overall and less on-site construction would reduce the potential for construction workers to live in local RV campgrounds. 	<ul style="list-style-type: none"> The Revised Proposal would contain incrementally greater population and demand for parks and recreation facilities compared to SEIS Alternative 6, but less than SEIS Alternative 5. Onsite recreational facilities would be similar to SEIS Alternative 6 and would meet or exceed the Comprehensive Plan targets. The potential for construction workers to live in local RV campgrounds would be less than SEIS Alternative 5 and similar to SEIS Alternative 6.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
3.6 TRANSPORTATION		
<ul style="list-style-type: none"> SEIS Alternative 5 would result in temporary construction-related traffic impacts over the 30-year buildout period. Based on estimated grading, 200 to 400 trucks per month would be generated to haul grading materials. SEIS Alternative 5 would generate 1,826 net new weekday trips at buildout. SEIS Alternative 5 would increase traffic volumes and congestion on area roadways; this is an unavoidable effect of urban development. The following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 with future Baseline (without the project) conditions, and continue to operate at non-compliant LOS with SEIS Alternative 5: <ul style="list-style-type: none"> #8 – Ranger Station Rd / Miller Ave / W 2nd Street (SR 903) #11 – Douglas Munro Blvd / W 1st Street #12 – N Pine Street / W 1st Street #13 – N Stafford Ave / W 2nd Street (SR 903) #15 – N Oakes Ave / W 2nd Street (SR 903) The following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 as a result of the additional traffic generated by SEIS Alternative 5: <ul style="list-style-type: none"> #2 – Bullfrog Road / I-90 WB Ramps #3 – Bullfrog Road / Tumble Creek #7 – Denny Ave / W 2nd Street (SR 903) #9 – N Pine Street / W 2nd Street (SR 903) 	<ul style="list-style-type: none"> SEIS Alternative 6 would result in temporary construction-related traffic impacts over the 17-year buildout period. Based on estimated grading, including the commercial center, approximately 200 trips per month would be generated to haul grading materials. SEIS Alternative 6 would generate 1,225 net new weekday (Friday) trips at buildout and 13 fewer Sunday trips. Like SEIS Alternative 5, SEIS Alternative 6 would increase traffic volumes and congestion on area roadways. The same study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 with future Baseline conditions and would continue to operate at non-compliant LOS with SEIS Alternative 6. The following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour by 2037 as a result of the additional traffic generated by SEIS Alternative 6: <ul style="list-style-type: none"> #1 – Bullfrog Road / I 90 EB Ramps #3 – Bullfrog Road / Tumble Creek #7 – Denny Ave / W 2nd Street (SR 903) #9 – N Pine Street / W 2nd Street (SR 903) #15 – N Oakes Ave / W 2nd Street (SR 903) 	<ul style="list-style-type: none"> The temporary construction-related traffic and impacts of the Revised Proposal would be similar to SEIS Alternative 6 and less than SEIS Alternative 5 and would occur over a shorter (8-year) development period. The Revised Proposal would generate 1,302 net new weekday (Friday) trips at buildout and 26 additional Sunday trips. Like SEIS Alternatives 5 and 6, the Revised Proposal would increase traffic volumes and congestion on area roadways and intersections. The same study intersections that operate at non-compliant LOS with future Baseline conditions would operate at non-compliant LOS with the Revised Proposal. The same intersections that operate at non-compliant LOS during the summer weekday PM peak hour under SEIS Alternative 6 would also operate at non-compliant LOS with the Revised Proposal. <p>The same intersections would operate at non-compliant LOS during summer Friday PM peak hour and summer Sunday PM peak hour with SEIS Alternative 6 and the Revised Proposal.</p>

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
<ul style="list-style-type: none"> – #15 – N Oakes Ave / W 2nd Street (SR 903) – #17 – Pennsylvania / 2nd Street – #21 – Pennsylvania Ave / N 1st Street (SR 903) in Roslyn – #30 – SR 903 / Site Access Connector Road <p>Additional study intersections would operate at non-compliant LOS during the Friday and Sunday summer PM peak hour as a result of project traffic.</p> <ul style="list-style-type: none"> • Increased traffic volumes on area roadways from SEIS Alternative 5 could result in moderate increases in accident rates; however, no study intersections were identified as high accident locations. • New trails and sidewalks (not quantified) would be provided throughout the site and would connect with off-site trails. 	<ul style="list-style-type: none"> – #21 - Pennsylvania Ave / N 1st Street (SR 903) in Roslyn <p>Additional study intersections would operate at non-compliant LOS during the Friday and Sunday summer PM peak hour as a result of project traffic.</p> <ul style="list-style-type: none"> • During the weekday summer PM peak hour, all evaluated roadway sections are anticipated to operate at compliant levels of service. • During the Friday summer PM peak hour, two evaluated roadway sections would operate at non-compliant levels of service: <ul style="list-style-type: none"> – W 2nd Street (SR 903) west of N Oakes Ave – W 2nd Street (SR 903) west of N Stafford Ave • During the Sunday summer PM peak hour, three evaluated roadway sections would operate at non-compliant levels of service: <ul style="list-style-type: none"> – I-90 Westbound Off-Ramp (Exit 84A) – W 2nd Street (SR 903) west of N Oakes Ave – W 2nd Street (SR 903) west of N Stafford Ave • Like SEIS Alternative 5, traffic volumes on area roadways due to SEIS Alternative 6 could result in moderate increases in accident rates. No high accident locations were identified. • Includes an approximate 6-mile network of non-motorized trails and sidewalks would connect with off-site trails. 	<ul style="list-style-type: none"> • During the weekday summer PM peak hour, all evaluated roadway sections are anticipated to operate at compliant levels of service. • The Revised Proposal would result in the same non-compliant roadway sections during the Friday and Sunday summer PM peak hour as SEIS Alternative 6. • Like SEIS Alternatives 5 and 6, traffic volumes on area roadways could result in moderate increases in accident rates. No high accident locations were identified. • Includes an approximate 6-mile network of non-motorized trails and sidewalks.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
3.7 PUBLIC SERVICES		
<ul style="list-style-type: none"> SEIS Alternative 5 population would generate demand for several public services: police, fire/emergency medical, medical dispatch, hospital, and schools. Effects would occur during the construction and operation phases. SEIS Alternative 5 population would generate the following approximate need for additional public services staff at buildout in 2051, based on the project's population¹ and de facto levels of services: <ul style="list-style-type: none"> 8.9 police officers (City Police Dept.) 1.8 paid full-time firefighters (City Fire Dept.) 5.4 EMTs and 6.6 paramedics (Hospital Dist. No. 2 Medic 1) 0.6 physicians, 4.8 APCs, and 3.6 RN (Hospital Dist. No. 2 clinics in Cle Elum) 1.0 physicians, 0.2 APCs, and 6.0 RNs (Hospital Dist. No. 1 in Ellensburg) 0.9 dispatchers (KITTCOM) 25.4 teachers based on 376 additional students (Cle Elum – Roslyn School Dist.) 	<ul style="list-style-type: none"> SEIS Alternative 6 would generate less demand for public services generally, due to fewer permanent residents, less commercial development, and a shorter buildout period. SEIS Alternative 6 population would generate the following approximate need for additional public services staff at buildout in 2037, based on the project's population and de facto levels of service. (Refer to the updated discussion of de facto population- based service standards and estimated RV proxy population in Addendum Section 3.7.): <ul style="list-style-type: none"> 7.7 police officers (City Police Dept.) 1.6 paid full-time firefighters (City Fire Dept.) 4.7 EMTs and 5.7 paramedics (Hospital Dist. No. 2 Medic 1) 0.5 physicians, 4.2 APCs, and 3.1 RNs (Hospital Dist. No. 2 clinics in Cle Elum) 0.9 physicians, 0.2 APCs, and 5.2 RNs (Hospital Dist. No. 1 in Ellensburg) 0.8 dispatchers (KITTCOM) 15.5 teachers based on 229 additional students (Cle Elum – Roslyn School Dist.) 	<ul style="list-style-type: none"> Demand for public services would be similar to SEIS Alternative 6 and less than SEIS Alternative 5. The Revised Proposal would generate the same or fractionally greater approximate need for public services staff at buildout, based on the project's population and de facto levels of service. (Refer to the updated discussion of de facto population-based service standards and estimated RV proxy population in Addendum Section 3.7): <ul style="list-style-type: none"> 8.0 police officers (City Police Dept.) 1.6 paid full-time firefighters (City Fire Dept.) 4.9 EMTs and 5.9 paramedics (Hospital Dist. No. 2 Medic 1) 0.5 physicians, 4.3 APCs, and 3.2 RNs (Hospital Dist. No. 2 clinics in Cle Elum) 0.9 physicians, 0.2 APCs, and 5.3 RNs (Hospital Dist. No. 1 in Ellensburg) 0.8 dispatchers (KITTCOM) 15.8 teachers based on 234 additional students (Cle Elum– Roslyn School Dist.)
	<ul style="list-style-type: none"> Alternative approaches to determining level of service are discussed in Section 3.7. 	<ul style="list-style-type: none"> Alternative approaches to determining level of service are discussed in Section 3.7.
3.8 UTILITIES		
<ul style="list-style-type: none"> At buildout, average daily treated water demand would range from 0.31 to 0.50 MGD. The City Water System would require the following improvements to serve the project together with other approved/vested projects: <ul style="list-style-type: none"> New filtration train in the Water Treatment Plant 	<ul style="list-style-type: none"> At buildout, average daily treated water demand would range from 0.17 to 0.36 MGD. The same improvements to the City Water System would be required as under SEIS Alternative 5. 	<ul style="list-style-type: none"> At buildout, average daily treated water demand under the Revised Proposal would range from 0.18 to 0.38 MGD. Improvements to the City Water System would be the same as for SEIS Alternatives 5 and 6.

¹ Assumes that all the residential units are primary homes.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
<ul style="list-style-type: none"> – New Zone 3 finished water pump – New Zone 3 reservoir storage • At buildout, monthly wastewater flow would range from 0.26 to 0.30 MGD. The City Wastewater Treatment Plant (WWTP) has adequate capacity to serve the project. • SEIS Alternative 5 would generate approximately 2,900 tons of solid waste per year at buildout. Improvements to the Cle Elum Transfer Station could be required. 	<ul style="list-style-type: none"> • At buildout, monthly wastewater flow would range from 0.21 to 0.23 MGD under SEIS Alternative 6. The City WWTP has adequate capacity to serve the project. • SEIS Alternative 6 would generate approximately 2,218 tons of solid waste per year at buildout. Improvements to the Cle Elum Transfer Station could be required. 	<ul style="list-style-type: none"> • At buildout, monthly wastewater flow would range from 0.20 to 0.24 MGD. The City WWTP has adequate capacity to serve the project. • The Revised Proposal would generate approximately 2,343 tons of solid waste per year at buildout. Improvements to the Cle Elum Transfer Station could be required.
3.9 FISCAL & ECONOMIC CONDITIONS		
<ul style="list-style-type: none"> • Operational economic impacts of SEIS Alternative 5 would include increased employment opportunities, higher potential personal income, lower unemployment, and new business commerce. • Development of SEIS Alternative 5 business park uses would increase permanent employment by approximately 1,900 new employees at full buildout. • SEIS Alternative 5 would net positive revenues to the City of Cle Elum over the course of the project and at full buildout. • Costs could exceed tax revenues for other public service purveyors. However, the affected districts primary sources of revenues include charges for service, intergovernmental revenues, and/or other sources, and these revenues could be scaled-up to meet demand as they have historically. Mitigation may or may not be required. 	<ul style="list-style-type: none"> • Operational economic impacts under SEIS Alternative 6 would be similar to SEIS Alternative 5 and are expected to be positive. • Development of SEIS Alternative 6 (including future commercial development and the RV resort) would result in approximately 400 new permanent and seasonal employees at full buildout. • SEIS Alternative 6 would generate net positive revenues to the City, but fiscal surpluses would be lower than those with SEIS Alternative 5. The possible commercial development could generate small fiscal shortfalls in earlier years while the residential and RV resort could generate fiscal shortfalls post buildout. • Costs could exceed tax revenues for other service purveyors under SEIS Alternative 6 if tax revenues alone are considered, similar to SEIS Alternative 5. However, the affected districts primary sources of revenue include charges for service, intergovernmental revenues and/or other sources, and these revenues could be scaled-up to meet demand as they have historically. Therefore, 	<ul style="list-style-type: none"> • Operational economic impacts would be similar to SEIS Alternative 6 and are expected to be positive. • Development of the Revised Proposal would result in approximately 400 new permanent and seasonal employees from the commercial development and RV resort at buildout, similar to SEIS Alternative 6. • The Revised Proposal would generate net positive revenues to the City at buildout: \$2.7 cumulative net surplus in general revenues and \$5.3 million in restricted revenues. Fiscal surpluses would be lower than those with SEIS Alternative 5. • Costs could exceed tax revenues for other service purveyors under the Revised Proposal, similar to SEIS Alternatives 5 and 6. If tax revenues alone are considered. However, the affected districts primary sources of revenue include charges for service and intergovernmental revenues, and these revenues could be scaled-up to meet demand as they have historically. Therefore, mitigation may or may not be required.

SEIS Alternative 5 (2002 Approved Master Plan)	SEIS Alternative 6 (2020 Proposal)	Revised Proposal (2023)
<ul style="list-style-type: none"> Mitigation agreement with service providers would address potential shortfalls, as feasible. 	<p>mitigation may or may not be required.</p> <ul style="list-style-type: none"> Mitigation agreements would be executed with service providers to address potential shortfalls, as feasible. Monitoring provisions should be included to verify assumptions and estimates and to track actual demand, as appropriate. 	<ul style="list-style-type: none"> Mitigation agreements would be executed with service providers to address potential estimated shortfalls, as feasible. Monitoring provisions should be included to verify assumptions and estimates and to track actual demand, as appropriate.

1.4 Mitigation Measures

No new significant adverse impacts would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the *Final SEIS*. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

Earth

Required Mitigation Measures

- 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.

Water Quantity & Quality

Proposed Mitigation Measures (Included in the Project)

Approved 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.

Plants, Animals & Wetlands

Proposed Mitigation Measures (Included in the Project)

Approved 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.

Air Quality/GHGs

Proposed Mitigation Measures (Included in the Project)

- 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.

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).

Required Mitigation Measures

- 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.

Aesthetics

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.

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.

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.~~

Approved 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.

Approved Bullfrog Flats Conditions of Approval Not Included in the Proposal

- ~~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.

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

- 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.

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.

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

- 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.

Transportation

Overall, the significant adverse impacts on transportation that would occur from the Revised Proposal are consistent with those identified in the *Final SEIS*. Additionally, no new off-site mitigation measures are required for the Revised Proposal. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

Table 1-3 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 1-3** 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 1-3** 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 1-3
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 1-3** 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 1-3** 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 1-3**, 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 1-3** 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 1-3** that are forecast to operate at non-compliant LOS in future years 2025, 2031, or 2037 without or with full buildout of 47th North during the weekday summer PM peak hour.

The key differences between **Table 1-3** 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 1-4**.

As shown in **Table 1-4**, 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 1-4
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 1-4**, 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.

Other Mitigation Measures

Other mitigation measures related to traffic monitoring, construction management program, and trail system and sidewalks still apply with the Revised Proposal and are consistent with mitigation measures in the *Final SEIS*. A complete list of mitigation measures is included in **Appendix F**.

Public Services

Proposed Mitigation Measures (Included in the Project)

Approved 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.

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 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.

Utilities

Required Mitigation Measures

Solid Waste

- ~~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.~~

Fiscal Condition

No new, significant or materially different fiscal impacts would occur from the Revised Proposal and no additional mitigation measures are recommended.

The mitigation measure identified below is updated to provide additional considerations relating to fiscal monitoring; monitoring was recommended in the Final SEIS and would similarly apply to the Revised Proposal.

City of Cle Elum

- 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.

Chapter 2

DESCRIPTION OF THE REVISED PROPOSAL

CHAPTER 2

DESCRIPTION OF THE REVISED PROPOSAL

2.1 Background

Introduction

The *47° North Revised Master Site Plan Amendment Proposal* (Revised Proposal) is based on pre-application discussions and information and the revised formal application prepared by Sun Communities. The Revised Proposal incorporates some focused revisions to the project that was previously evaluated in the 2020/2021 SEIS. The principal features of the Revised Proposal include:

- 757 residential units, including 50 affordable housing units that are integrated into the project being developed by Sun Communities;
- 627 Recreational Vehicle (RV) sites;
- a 150,000-square foot commercial center that is integrated into the project being developed by Sun Communities
- 553 acres of open space;
- private amenity centers and other recreational facilities, and public and private parks; and
- a 13.4-acre expansion of the Cle Elum Cemetery.

Approved Bullfrog Flats Master Site Plan & Development Agreement

The Master Site Plan approved for the 1,100-acre Bullfrog Flats property in 2002 provided for the construction of 1,334 dwelling units (including 810 single family units and 524 multi-family units), a 75-acre/950,000-square foot business park (including a limited amount of small-scale retail use), and 524 acres of open space. It also provided for the dedication of several properties for public uses including:

- 35 acres for expansion of the Cle-Elum Roslyn school site;
- 12 acres for expansion of the city water treatment plant;
- 12 acres for a municipal (community) recreation center;
- 10 acres for expansion of the Cle Elum Cemetery; and
- 7.5 acres for the construction of 50 affordable housing units.

The Bullfrog Flats Master Site Plan was approved by the city in 2002 subject to numerous development conditions. Approval followed review pursuant to SEPA and preparation of an EIS for the Cle Elum Urban Growth Area (UGA), annexation, and adoption of Planned Mixed Use zoning for the property. A Development Agreement between the city and New Suncadia, also adopted in 2002, details the obligations of both parties and specifies the standards and conditions that will govern development of the property.

Other than the dedication of properties to the School District and the city in the early 2000s, and approval by the city of a Short Plat in 2007, no actions had been taken to implement the approved Master Site Plan until recent activities relating to the sale of the property.

47° North Master Site Plan Amendment & SEPA Review

In 2019, New Suncadia informed the city that they had entered into an agreement to potentially sell approximately 824 acres of the Bullfrog Flats site to Sun Communities, while retaining ownership of approximately 25 acres of the property for future development of a commercial center. Sun Communities indicated that they would be proposing revisions to the approved Master Site Plan to reduce the number of residential units and to add a Recreational Vehicle (RV) resort component. They renamed the planned project “47° North”.

Based on initial project information submitted to the City of Cle Elum, the city concluded that the proposed revisions to the approved Master Site Plan would constitute a “major amendment”, as that term is defined in the Development Agreement. As lead agency pursuant to the State Environmental Policy Act (SEPA), the city determined that a Supplemental Environmental Impact Statement (SEIS) should be prepared to update the 2002 Cle Elum UGA EIS, as necessary, to reflect the changes that have occurred since the original approval and to evaluate the proposed revisions to the project. The 47° North Master Site Plan Amendment Draft SEIS was published in September 2020, and the Final EIS in April 2021. Two alternatives were analyzed in the SEIS: SEIS Alternative 5 – Approved Bullfrog Flats Master Site Plan (No Action), which was updated to reflect current background conditions; and SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment. Fifteen elements of the environment were evaluated in the SEIS.

In December 2021, Sun Communities acquired all 889 acres of the Bullfrog UGA properties from New Suncadia, including the 25 acres that New Suncadia had intended to develop as a commercial center. In February 2022, the Cle Elum City Council gave its consent to the transfer of the rights, responsibilities, and obligations under the Bullfrog UGA Development Agreement to Sun Communities. Sun Communities is now preparing to submit a revised application to modify the approved Master Site Plan which incorporates some focused revisions to the project that was evaluated in the SEIS. Because the revised application could possibly result in some impacts that were not identified in the SEIS, the city has determined that the project revisions will require further SEPA review.

To make an appropriate determination, the city reviewed the nature and extent of the likely revisions to the proposal communicated by Sun Communities, the type and magnitude of anticipated impacts, and the analysis contained in the SEIS. Based on this review, the city concluded that an Addendum to the SEIS is an appropriate SEPA document to use to evaluate impacts associated with the Revised Proposal. Per WAC 197-11-600(4)(c), an Addendum is appropriate when a proposal has been modified, but the changes would not

result in probable significant adverse impacts that are not within the range of impacts and alternatives analyzed in an existing environmental document. As noted in the Introduction to this Addendum, the city has reviewed the prior SEIS and determined that it is directly relevant to the present proposal; pursuant to WAC 197-11-600(4)(a) and 197-11-630, therefore, the city is adopting the SEIS for purposes of environmental review for the Revised Proposal and providing additional information about impacts in this Addendum. Although the SEPA Rules do not require a comment period for an Addendum, the city has decided to make it available for public review and comment.

Following is a detailed description of the *47° North Revised Master Site Plan Amendment Proposal*. The Revised Proposal is compared to SEIS Alternative 6.

2.2 Project Location

The 47° North property is located in the southwestern portion of the City of Cle Elum, generally bounded by I-90, Bullfrog Road, SR 903, and the city cemetery (see **Figure 2-1**, Regional Map, and **Figure 2-2**, Vicinity Map).

The Revised Proposal site is approximately 889 acres in size, about 65 acres larger than the site under SEIS Alternative 6 (and 211 acres smaller than the approved 2002 Bullfrog Master Plan site). The difference in site area under the Revised Proposal, compared to SEIS Alternative 6, is due to the addition of the commercial property to the eastern part, addition of open space to the southern part of the site, and removal of the municipal recreation center property from the northern part and a road dedication from the southern part of the site (see **Figure 2-3**, Boundary Map – Revised Proposal)

2.3 Revised Proposal

Overview

Sun Communities' stated vision for 47° North is to provide housing that is financially accessible for both local and public service employees, and an RV resort component that will incorporate high development and infrastructure standards. The vision for 47° North will be guided by the revised Master Site Plan and will be implemented based on project-specific conditions of approval, a revised Development Agreement, and site-specific development permits approved by City of Cle Elum.

The Proposed Actions and approvals for the Revised 47° North Project continue to include:

- Major Amendment to the Bullfrog Flats Master Site Plan (City of Cle Elum);
- Revised Development Agreement between the city and the Applicant;
- Subdivision and/or Boundary Line Adjustment approvals (City of Cle Elum); and
- Local, state, and federal permit approvals required for construction and development of the project.

47° North Revised Proposal SEIS Addendum



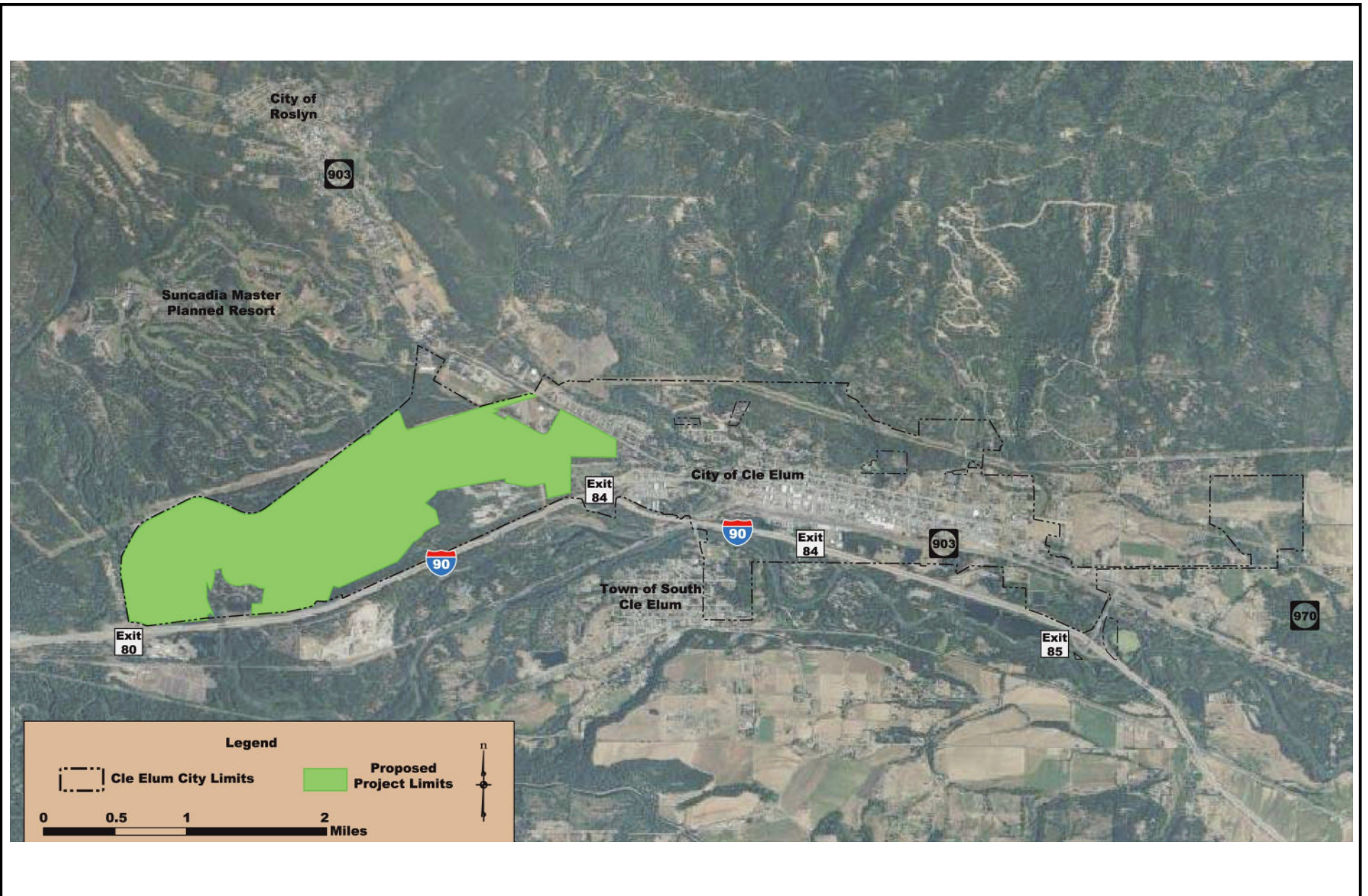
Note: This figure is not to scale



Source: Google Maps and EA Engineering, 2020.

Figure 2-1
Regional Map

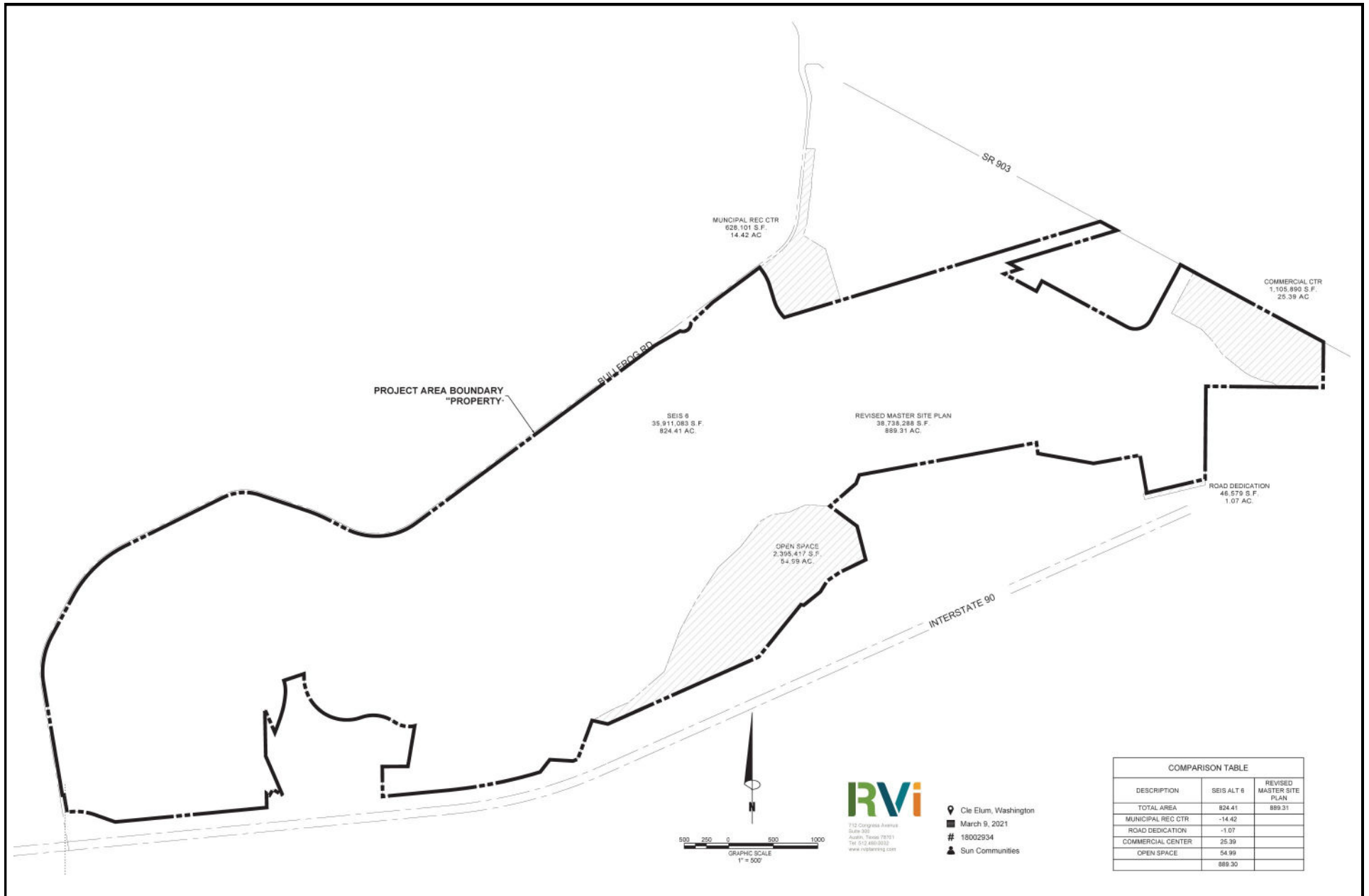
47° North Revised Proposal
SEIS Addendum



Source: ESM Consulting Engineers, 2023.

Figure 2-2
Vicinity Map

47° North Revised Proposal SEIS Addendum



Source: Atwell, LLC.

Figure 2-3
Site Boundary Map

Proposed Development

The Revised Proposal incorporates the Applicant's proposed revisions to the approved Bullfrog Flats Master Site Plan. It features development of a mix of residential, RV resort, commercial, and open space/recreational uses on the 889-acre site (see **Table 2-1** and **Figure 2-4**, Master Site Plan – Revised Proposal). Key changes to the Revised Proposal compared to SEIS Alternatives 6 include:

- inclusion of 50 affordable housing units, dispersed in the project's multi-family areas. It was previously assumed that environmental review for the development of these units would occur separately;
- inclusion of the 25-acre commercial property in the project and development of a mix of retail, restaurant, and office uses as part of the master plan. This use was previously evaluated as a separate project that would be developed in the future by a different property owner;
- removal of the 12-acres dedicated to the city for a municipal recreation center from the master plan site. The City of Cle Elum and New Suncadia implemented an agreement that provided for transfer of title to the recreation center site and provided payments to support construction of a facility. Therefore, the municipal recreation center property is not part of Revised Proposal. Separate environmental review will be conducted by the city as development plans are prepared;
- addition of approximately 55 acres of undeveloped open space that was formerly categorized as Reserve area under SEIS Alternative 5 (this area was not within the SEIS Alternative 6 site area); and
- a different development phasing plan with anticipated buildout of all land uses by 2031.

Residential Uses

Single Family

Construction of the proposed single family housing is scheduled to begin in 2023 and be completed in 2028 (see the *Development Schedule* later in this Project Description for details). A total of 527 single family residential units would be developed on 116.7 acres¹ in the eastern portion of the site, the same number of units on less area than under SEIS Alternative 6 (see **Table 2-1** and **Figure 2-4**). The single family neighborhoods would be in the same general locations as under SEIS Alternative 6. However, the single family neighborhood to the southwest of the commercial center under SEIS Alternative 6 would become multi-family housing under the Revised Proposal. The single family residential units would be situated on approximately 5,500 to 7,000-square foot lots. At buildout, the net density in the single family area would be 6.4 dwelling units/acre, slightly more dense than SEIS Alternative 6.²

¹ The 116.7 acres represents gross acreage.

² Net density is calculated based on net acreage, calculated as gross acreage with a 25% allowance for roads and utility rights of way.

Table 2-1
LAND USE SUMMARY COMPARISON –
SEIS ALTERNATIVE 6 & REVISED PROPOSAL

	SEIS Alternative 6		Revised Proposal	
	Acres	Units	Acres	Units
Residential Uses				
Single Family	124.7	527	116.7	527
Multi-Family	18.6	180	28.2	180
Affordable Housing	6.8	--- ¹	--- ²	50 ³
Subtotal	150.1	707	144.9	757³
Non-Residential Uses				
RV Resort Sites & Amenity Ctr./Community Park ⁴	150.5	627	130.8	627
Residential Amenity Centers ⁵	6.0		6.0	
Trail Head Park	6.0 ⁶		6.0	
Commercial Center	(25.4) ⁷		25.4 ⁸	
Subtotal	162.5	627	168.3	627
Other Uses				
Municipal Recreation Center Site	12.2		--- ⁹	
Cemetery Expansion Site	13.4		13.4	
Connector Road	9.5		9.5	
Subtotal	35.1		22.9	
Open Space				
Undeveloped Open Space ¹⁰	436.1		513.7 ¹¹	
Wetlands/Buffers	3.4		3.4	
Power ROW	37.2		36.1	
Subtotal	476.7		553.2	
TOTAL	824.4	1,334	889.3	1,384³

Source: Sun Communities, 2020 and 2022.

Note: any mathematical discrepancies are due to rounding.

¹ A 6.8-acre affordable housing site was reserved; however, development of these affordable housing units was not part of the project under SEIS Alt. 6 and was assumed to occur in the future by the city of another party.

² The proposed affordable housing units are included in the multi-family area and not in a separate portion of the site.

³ Fifty (50) affordable housing units are part of the project under the Revised Proposal. The analyses in the Addendum shows results with and without these units.

⁴ The RV resort amenities include 5.0 acres of amenities, the same amount as SEIS Alt. 6; these amenities would be mixed throughout the RV resort under the Revised Proposal.

⁵ The residential amenities include amenity center(s) totaling 6.0 under SEIS Alt. 6 and the Revised Proposal.

⁶ The 6.0-acre Trail Head Park was the Adventure Center under SEIS Alt. 6.

⁷ The Commercial Center property was not part of the Master Site Plan but possible development was analyzed under SEIS Alt. 6.

⁸ The Commercial Center property is now part of the Master Site Plan.

⁹ The Municipal Recreation Center has been dedicated to the city and is not part of the site under the Revised Proposal.

¹⁰ The Undeveloped Open Space includes community/recreation open space (e.g., public trails, one 1.0-acre public trail park, and 1.0-acre of private community parks); stormwater open space; and steep slope areas their buffers under the Revised Proposal. SEIS Alt. 6 would have the same types of Undeveloped Open Space, except there would be three 0.5-ac. public trail parks and two 0.5-acre private community parks under SEIS Alt. 6.

¹¹ The Undeveloped Open Space includes a 55.0-acre parcel in the southern portion of the site that has been added to the property under the Revised Proposal.

47° North Revised Proposal SEIS Addendum



Source: Atwell, LLC.

Figure 2-4
Revised Proposal Master Site Plan

Sun Communities retains ownership of the underlying land in all its projects, and the company leases individual home sites to home purchasers and renters (see Draft SEIS – Chapter 2 for details on Sun Communities’ residential lease/ownership structure). Individual lots may be platted or un-platted and demarked using other techniques.

The single family housing units would average from 1,000 square feet to 2,000 square feet in size, would not exceed 20 feet in height, and, according to the Applicant, would be designed in an architectural style that is intended to compliment the rural mountain character of the area. All the units would be manufactured or modular housing (see Draft SEIS – Chapter 2 for details on the residential design and construction).

Multi-family

Construction of the proposed multi-family housing is scheduled to begin in 2023 and be complete in 2027 (see the *Development Schedule* discussion later in this Project Description for details). A total of 180 multi-family residential units would be developed in two areas totaling 28.2 acres³ in the northeastern portion of the site, the same number of units as SEIS Alternative 6 but with some of the units located in an additional area to the southwest of the commercial center (see **Table 2-1** and **Figure 2-4**). The multi-family housing is planned to consist of tri-plexes, each on 8,000-square foot lots, or multi-story apartment buildings. At buildout, the net density in the multi-family area, including the affordable housing (see below), would be 11.0 du/acre, slightly less dense than SEIS Alternative 6.⁴

The multi-family units would average from 600 to 1,200 square feet in size, the buildings would not exceed 50 feet in height, and would be designed in an architectural style that is intended to complement the rural mountain character of the area. The units would be a combination of manufactured units, conventional stick-built, and stacked modular units (see Draft SEIS – Chapter 2 for details on the residential design and construction).

Affordable Housing

Construction of the proposed affordable housing is scheduled to begin in 2023 and all the affordable housing units would be ready for lease in 2027 (see the *Development Schedule* discussion later in this this Project Description for details). Fifty (50) affordable housing units are part of the project under the Revised Proposal; the units would be integrated and dispersed within multi-family neighborhoods rather than being a distinct development area. This housing would be developed and maintained by Sun Communities. The technical analyses in this SEIS Addendum analyze the project with and without these units to highlight the environmental effects of the additional units.

Under SEIS Alternative 6, a 6.8-acre property located in the southeastern portion of the site was reserved for dedication to the City of Cle Elum for future development of affordable housing; this area is now open space under the Revised Proposal. No specific development

³ The 28.2 acres represents gross acreage.

⁴ Ibid 3.

was proposed or assumed on the affordable housing property in the SEIS and potential affordable housing units were not included in the unit calculations for SEIS Alternative 6 or evaluated in the SEIS. Note that the 2002 Development Agreement stipulated that the 50 affordable units assumed to be developed by others on the 6.8-acre site did not count towards the limit of 1,334 approved housing units.

Non-Residential Uses

RV Resort Sites & Amenities

Construction of the RV resort element of the Revised Proposal is scheduled to begin in 2023 and be completed in 2027 (see the *Development Schedule* discussion later in this Project Description for details). The RV resort would feature 627 sites located on 130.8 acres in the central portion of the site, the same number of RV sites as SEIS Alternative 6 but on a smaller site area (see **Table 2-1** and **Figure 2-4**). The easternmost portion of the RV resort would feature traditional pull-through and back-in RV sites, as well as various forms of “glamping”⁵. The westernmost portion may be limited to glamping, including the potential for placement of park models⁶ and/or airstreams. Other uses in the central and western areas would be focused on recreational facilities and would include a mix of indoor and outdoor recreation amenities, such as parks, playground, trails, sport courts, dog parks, mountain bike trails, and indoor and outdoor gathering space.

Five (5)+ acres of amenity areas would be mixed throughout the RV resort, rather than concentrated in one location, as was the case with SEIS Alternative 6. There would also be a welcome center with check-in kiosks at the RV resort entrance. Multiple comfort stations, a maintenance facility, and various sport courts would also be located throughout the resort. The proposed recreational buildings under the Revised Proposal would vary from 4,000 to 11,000 square feet in size, would not exceed 50 feet in height, and would be designed in an architectural style that is intended to compliment the rural mountain character of the area. The RV resort buildings would be conventional stick built (see Draft SEIS – Chapter 2 for details on the RV resort design and construction).

Sun Communities would own all the buildings and sites in the RV resort and would lease the sites. The average stay for the typical guest of the RV resort is expected to be three to four days. Seasonal passes to the RV resort would be sold with the stipulation that the site could be occupied a maximum of nine months of a calendar year. There would be no permanent

⁵ Glamping is a term that blends glamorous and camping. Glamping is defined in the industry as a style of camping with resort-type amenities, and units may include yurts, safari tents, and airstream trailers, and is typically more luxurious than “traditional” style camping.

⁶ A park model RV (PMRV) is a unique trailer-type RV that is designed to provide temporary accommodations for recreation, camping, or seasonal use. These units are designed and built to be used for recreational/camping purposes only. They are not meant to be affixed to the property in any way, they do not improve property values in any way, and they are neither designed nor intended by their manufacturer to be used as a permanent residence. Most PMRV owners (67%) locate their unit within several hours of drive time from their primary residences and use them for weekend getaways. Some owners may use them as a seasonal/temporary get-away to escape more extreme weather. (Source: Recreation Vehicle Association.)

residents living at the RV resort (see Draft SEIS Chapter 2 for details on the RV resort lease/ownership structure).

Residential Amenity Centers

Two amenity centers totaling approximately 6.0 acres would be located in the northern part of the residential areas under the Revised Proposal, the same amount as under SEIS Alternative 6 but in different locations (see **Table 2-1** and **Figure 2-4**). The recreational amenity centers would include: combined clubhouse and fitness building, pool, playground, sport courts, recreation lawn, and maintenance facility.

Trail Head Park

The approximately 6.1-acre Adventure Center in the northern portion of the site under SEIS Alternative 6 would be a public park and trail head (Trail Head Park) under the Revised Proposal (see **Table 2-1** and **Figure 2-4**). This park would likely include a bathroom and small parking area and could also feature a concession area for equipment rentals, mini golf, and an adventure course.

Commercial Property

A 25.4-acre property in the eastern part of the site is proposed to be developed as a commercial center (see **Table 2-1** and **Figure 2-4**). Construction of the commercial center is scheduled to begin in 2023 and would be completed in 2031. The commercial site was not part of the site or included in the SEIS Alternative 6 master plan. However, hypothetical future development of the property was studied in the SEIS to understand the potential impacts of this development.

Development assumptions for the commercial center under the Revised Proposal and SEIS Alternative 6 are listed in **Table 2-2**. As shown, the total potential development under the Revised Proposal and SEIS Alternative 6 would be the same (150,000 square feet); however, the mix of commercial uses would differ somewhat.

**Table 2-2
COMMERCIAL DEVELOPMENT ASSUMPTIONS –
SEIS ALTERNATIVE 6 & REVISED PROPOSAL**

Potential Development	Development Assumptions	
	SEIS Alt. 6	Revised Proposal
Grocery Store	45,000	50,000
Retail	25,000	56,000
Restaurant	20,000	24,000
Medical Offices	60,000	0
Office	0	20,000
Total Potential Development	150,000	150,000
Developable Area (not constrained by critical areas)	18 acres	18 acres

Source: New Suncadia, 2020, 2022.

Specifics on the commercial building design and construction under the Revised Proposal are not available at this time.

Other Uses

Cemetery Expansion Site

As with SEIS Alternative 6, a 13.4-acre area to the west of Laurel Hill Memorial Cemetery would be reserved to expand the cemetery.

Connector Road / Main Access Road

Under the Revised Proposal, the “Connector Road” included in SEIS Alternative 6 (occupying approximately 9.5 acres) would be modified and designed as the “Main Access Road”. This series of local/neighborhood roads would function to connect the residential areas onsite to the commercial area that is now part of the site and would provide access between SR 903 and Bullfrog Road. The access point to the Main Access Road from SR 903 would be southeast of its location under SEIS Alternative 6. The current proposal for this road includes two 12-foot travel lanes, an asphalt rolled edge, and a 5-foot sidewalk on one side of the road (or a 6-foot planter strip where no lots are adjacent to the sidewalk; see **Figure 2-5**, Main Access Road Cross-Section). The Main Access Road would be privately constructed, owned, and maintained by the Applicant.

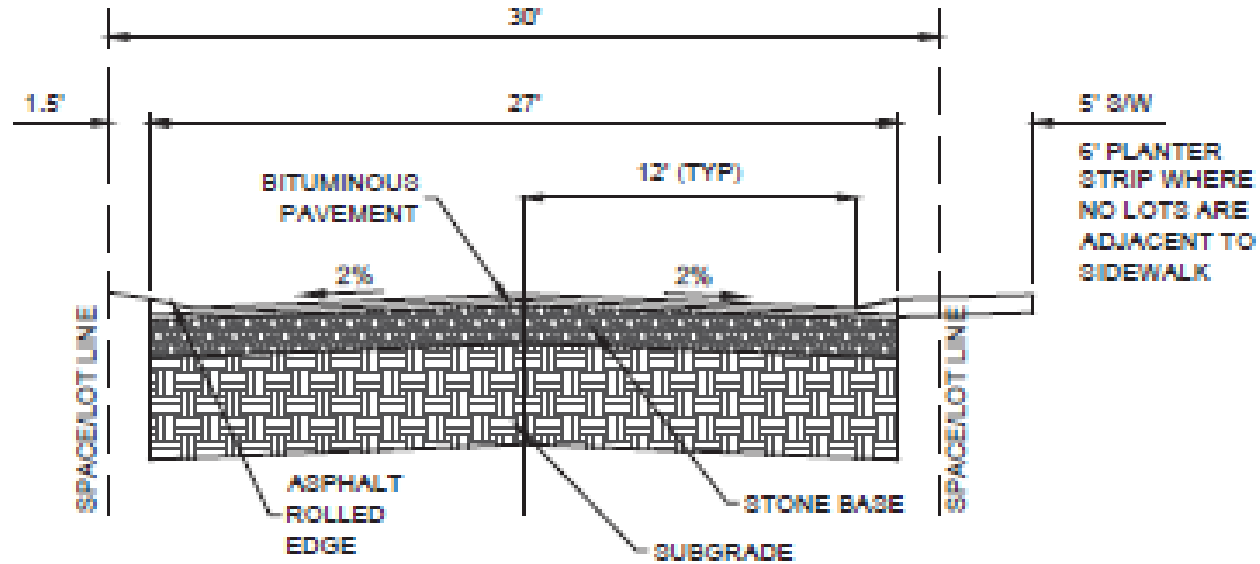
Open Space

A total of 553 acres (62% of the site) is proposed to be retained as open space, which is comprised of 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, more open space than under SEIS Alternative 6 (see **Table 2-1** and **Figure 2-4**). The greater amount of open space under the Revised Proposal and the larger overall site area is largely due to the addition of approximately 55 acres of open space along the southern site boundary.

Undeveloped Open Space

The undeveloped open space would include the following categories of open space described under SEIS Alternative 6: Natural Open Space, Managed Open Space, and River Corridor Open Space (see Draft SEIS – Chapter 2 for details on these open space categories and the related covenants and conservation easements). The Natural Open Space, Managed Open Space, and River Corridor Open Space areas would feature different types of recreation facilities. Consistent with adopted covenants and easements, the least intensive types of facilities would occur in the River Corridor Open Space.

47° North Revised Proposal
SEIS Addendum



**TYPICAL CROWN ROAD CROSS SECTION FOR
PRIVATE RESIDENTIAL MAIN ROAD**
NOT TO SCALE

NOTE: SPACE/LOT LINES ARE ILLUSTRATED FOR DELINEATION OF SPACE AREA, THESE LINES WILL NOT BE PLATTED AND ARE PROVIDED FOR TYPICAL SPACE LAYOUT ONLY.

Source: Atwell, LLC.

Figure 2-5

Main Access Road Cross Section

Wetlands and their Buffers

Three wetlands and their buffers, a total of 3.4 acres in area, are located in potential development areas in the RV/glamping area. Like SEIS Alternative 6, these wetlands/buffers would be protected pursuant to city regulations. On-site wetlands and their buffers along the Cle Elum River would be protected as well.

Powerline ROW

A total of approximately 36.2 acres of open space associated with two powerline easements is present onsite. Like SEIS Alternative 6, the vegetation in these easements, and trails proposed in the easements, would be maintained in accordance with the power company's requirements.

Parks

Public and private parks included in the Revised Proposal are described below.

Public Trails Parks

Two public trail parks would be provided under the Revised Proposal: one 1-acre park (approximate) to the east of the Managed Open Space and a 6-acre Trail Head Park (approximate) adjacent to Bullfrog Road, in the location of the Adventure Center under SEIS Alternative 6 (see the description of the public Trail Head Park under *Non-residential Uses* earlier in this Project Description). SEIS Alternative 6 included three 0.5-acre public trail parks. The public trail parks could include gathering areas with seating, fitness/exercise equipment, informative signs, etc.

Community Parks

Two private community parks, each approximately 0.5-acre in size, were included in the residential area under SEIS Alternative 6. Under the Revised Proposal, 1-acre of private park space would be provided around the residential amenity centers and several small pocket parks would be included in the residential areas.

Trails

Like SEIS Alternative 6, an approximately 6-mile-long network of trails and sidewalks would be provided throughout the site, including hiking/biking, and equestrian paths (see **Figure 2-1**). While no golf course is included in the project, paths for golf carts, made of asphalt or a compacted semi-impermeable material such as gravel, would be provided. The trails used for pedestrian, equestrian, and mountain biking would be composed of compacted aggregate, natural materials, or similar materials. The sidewalks would be constructed of asphalt. These trails would generally be located around the periphery of the proposed development, and would connect to on-site development, as well as to existing off-site trails in several locations (e.g., to the trails in Suncadia to the north, the Coal Mines Trail to the northeast, and the Horse Park to the south). Sidewalks would also be provided along one side of the Main Access Road connecting SR 903 and Bullfrog Road.

All trails constructed by Sun Communities in the development and open space areas onsite would be owned and maintained by Sun Communities. Horse trails or specific riding courses that would be used for access for the Horse Park may be permitted in the open space areas if approved by Sun Communities. These trails would be constructed and maintained by the Horse Park.

Development Schedule

Below is a summary of the proposed phasing plan and schedule for the Revised Proposal. This phasing plan is approximate and could be modified in response to economic and market conditions.

- **Phase 1 (2023 – 2025)**: single family, multi-family, and affordable housing; RV/glamping; and commercial center under construction
- **Phase 2 (2025 – 2027)**: single family, multi-family, and affordable housing; RV/glamping; and commercial center under construction
- **Phase 3 (2027 – 2028)**: single family housing and commercial center under construction
- **Phase 4 (2028 – 2031)**: commercial center under construction

As shown, it is anticipated that proposed development of the Revised Proposal would occur over an approximately nine-year period, starting in 2023, and ending in 2031. Buildout of the residential and RV/glamping areas would occur by 2028, and the commercial center by 2031.

For comparison, under SEIS Alternative 6, buildout of the RV/glamping sites and residential areas was also expected to occur by 2028. For analysis purposes, the SEIS assumed the off-site commercial property would be fully developed by 2037.

Clearing, Grading, & Impervious Surface Areas

Proposed development would require clearing of approximately 333 acres (37% of the site), the same amount as SEIS Alternative 6. The clearing limits would extend to the appropriate critical area buffers/setbacks, in particular the area of regulated slopes.

Proposed grading would match natural topography as much as possible. Grading for the Revised Proposal would include approximately 260,000 cubic yards (cy) of cut, and 233,000 cy of fill, less than under SEIS Alternative 6. Fill material, utility backfill, and road base would be imported from approved off-site sources.

With proposed development, approximately 129 acres (15% of the site) would be covered in impervious surfaces (e.g., rooftops, roadways, sidewalks, and parking areas), less than under SEIS Alternative 6.

Residents/Employees

It is assumed that the proposed construction of 527 single family, 180 multi-family residential units, and 50 affordable units would add a total of approximately 1,579 new, full-time residents to the City.⁷ Refer to the SEIS for additional discussion of residential housing

There would be no permanent population associated with the RV sites. However, several sections of the Addendum and the SEIS (e.g., Public Services and Utilities), estimate an equivalent or “proxy” population that is used for purposes of analysis.

The employees generated during construction would be similar to SEIS Alternative 6. The manufactured homes would be built in factories off-site – likely located in the Pacific NW – involving an approximate total of 90 to 130 employees over buildout of the project. An additional estimated 607 local construction jobs would be generated to assemble the homes and construct the other recreational buildings on site. Additional indirect construction jobs would be generated in the local area as well.

At full buildout of the Revised Proposal, it is estimated that Sun Communities would employ from 30 to 35 full time employees in the RV resort and residential areas, as well as an additional 70 to 90 seasonal employees during the peak RV resort season (anticipated to occur from June through August) at 47° North.⁸

The commercial development is estimated to generate approximately 300 employees at buildout in 2031, the same as SEIS Alternative 6.⁹

Site Access & Circulation

Like SEIS Alternative 6, one access point would be provided from SR 903 (an access point for the single/multi-family housing and the commercial center), and three access points would be provided from Bullfrog Road (a second access for the single/multi-family housing, and primary and secondary entrances for the RV resort). Access to the Trail Head Park would be directly from Bullfrog Road. (See **Figure 2-4.**)

The internal roads within the development areas onsite would be privately owned and maintained by the Applicant.

Emergency Access Road

The proposed access points and on-site access roads under the Revised Proposal would provide emergency access based on the 2021 International Fire Code (IFC), subject to confirmation by the City Fire Chief. Although not required, to enhance public safety for other neighborhoods in the Cle Elum area, the Revised Proposal would include an

⁷ Average occupancy and household size are based on U.S. Census Bureau, 2016-2020, American Community Survey, 5-year estimates.

⁸ Resident and employment figures are based upon similar sized developments owned and managed by Sun Communities.

⁹ Employees were estimated by ECONorthwest based on commonly accepted assumptions.

emergency access road from the RV resort area that would extend to the southern site boundary (see **Figure 2-4**). The city and the Horse Park could continue this road offsite through the Horse Park and connect to Douglas Munro Boulevard. SEIS Alternative 6 included an emergency access from the RV resort, as well as a second emergency access road from the affordable housing site. Given that the affordable housing site would not be developed as a separate area under the Revised Proposal (the affordable housing would be integrated in the multi-family area), an additional emergency access road would not be provided from this area.

Utilities

Water

Like SEIS Alternative 6, water service for the project would be provided by the City of Cle Elum. Proposed single- and multi-family development, the RV resort, and the commercial center would be part of a private Group A water distribution system owned by Sun Communities and operated and maintained by a state-approved entity. Water mains would connect to the nearest available points of connection. The commercial center would be served by the existing 8-inch diameter City supply line.

All the non-residential buildings would include sprinkler systems in case of fire, as required by the City code. Fire hydrants would be provided throughout the residential areas. It is anticipated that a portion of the following landscaped areas would be irrigated: around both the RV and residential amenity centers and selectively throughout the RV resort. The single- and multi-family residential areas could also be irrigated, depending on the landscaping selected.

The city's water system would require improvements to serve the Revised Proposal. 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.

Sewer

Like SEIS Alternative 6, sewer service for the project would be provided by the City of Cle Elum. Proposed single- and multi-family development, and associated amenity centers, would be served by private 8-inch diameter gravity sanitary sewer mains that would be owned, operated, and maintained by Sun Communities.

The proposed RV resort would be served by private 8-inch diameter gravity sanitary sewer mains that would be owned, operated, and maintained by Sun Communities. The gravity sewer mains would connect to proposed sewer lift stations that would pump the flows via the force main to the existing 18-inch diameter sewer main. The commercial center would be served by public 8-inch diameter gravity sewer mains that would be owned, operated, and maintained by the City of Cle Elum.

The City Wastewater Treatment Plant has sufficient capacity to serve the Revised Proposal.

Stormwater Management

Stormwater management during construction and operation of the Revised Proposal would be similar to SEIS Alternative 6 (see the summary below).

During Construction

During construction, temporary stormwater management measures would be implemented to prevent erosion/sedimentation and the transport of pollutants from the site to downstream water resources. These measures would follow the Best Management Practices (BMPs) and requirements of the Construction Stormwater Pollution Prevention Plan and the currently active National Pollutant Discharge Elimination System (NPDES) Permit (No. WA0052361).

During Operation

A permanent stormwater management system would be installed onsite, in accordance with the 2019 Department of Ecology *Stormwater Management Manual for Eastern Washington*. A site-specific hydrologic model previously developed for both Suncadia and the 47° North site was used to design the 47° North system. Stormwater runoff from the developed site would generally be collected in catch basins or roadside water quality swales and directed to water quality and infiltration or detention facilities (depending on the soils) via pipes or conveyance swales. Sheet flow dispersion would also be used for stormwater runoff water quality and flow control for single family and RV resort areas that abut open space and slope away from the developed areas at a maximum slope of 15%. Overflow routes would be provided for all proposed stormwater facilities.

Solid Waste

Solid waste collection for the proposed development would be provided by Waste Management of Ellensburg or its successors. The waste would be hauled to the Cle Elum Transfer Station prior to transport to the Greater Wenatchee Land Fill in Douglas County for final disposal. The Transfer Station is reported to be near capacity and improvements would be required to accommodate the Revised Proposal. The Applicant would contribute a pro-rata share to construct improvements to the solid waste transfer station.

Energy

Electricity and natural gas service for the proposed development would be provided by PSE via extensions of existing facilities.

(See Section 3.9, **Utilities**, and **Appendix B** for details.)

NEW INFORMATION & ANALYSIS

CHAPTER 3

AFFECTED ENVIRONMENT, IMPACTS, ALTERNATIVES, MITIGATION MEASURES & SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

Introduction / Overview

The following provides an overview of the general content and organization of each section within **Chapter 3**. It is intended to help orient the reader to the discussion of alternatives, impacts, and mitigation measures.

This document is an SEIS Addendum (i.e., an Addendum to the Final SEIS (2021) for the *47° North Master Site Plan Amendment*), and **Chapter 3**, therefore, updates and adds information about the alternatives, impacts, and mitigation measures identified in the prior *SEIS* and SEIS Alternative 6 relative to the changes included in the Revised Proposal. The focus of this chapter is to identify and compare those impacts, and any new or modified mitigation measures. In general, changes to the Revised Proposal and differences in impacts identified in the Addendum are incremental in type and degree and are not significant.

Below is further description of the content and organization of the sections in **Chapter 3**, and some key assumptions for the alternatives and their analysis.

Site Area

In the 2002 Cle Elum UGA EIS, the original EIS for the project, development was proposed on a 1,100-acre site known as Bullfrog Flats. In the SEIS, development of SEIS Alternatives 6 was proposed on an 824-acre portion of the site called 47° North. SEIS Alternative 6 also evaluated hypothetical development on an adjacent 25-acre property to the east but not part of the 47° North proposal at the time.

The Revised Proposal site studied in this Addendum is approximately 889 acres in size. The difference in site area is due to adding the commercial property to the eastern part of the site and open space to the southern part of the site and removing properties in other portions of the site (e.g., for the municipal recreation center).

Details of the Revised Proposal are included in **Chapter 2**.

Methodology

The analyses conducted for this Addendum generally use the same methodologies as those used in the SEIS. However, where new data was available and other reasonable methods of

analysis were identified, these were employed in the Addendum analyses, as appropriate, including the following.

- **Housing/Population/Employment**
 - updated census data,
 - updated housing value information,
 - updated cumulative impact project permit counts, and
 - new demographic information on RV resort users.
- **Cultural Resources**
 - a new cultural resources survey of the commercial center property, including a pedestrian survey and auger probes.
- **Public Services**
 - updated information from the housing/population/employment analysis,
 - new information on calls for Medic One emergency service,
 - new information on sports and recreation-related incidents and calls for hospital emergency department services,
 - updated analysis of police service impacts (based on the ICMA method by the Police Department),
 - updated analysis of impacts to schools (based on updated student generation rate, grade level percentage information, and enrollment information from the School District),
 - additional analysis of hospital districts service impacts (based on existing and future staffing information provided by Kittitas Valley Hospital Districts), and
 - additional analysis of emergency dispatch service impacts from the RV resort (based call data provided by KITTCOM).
- **Transportation**
 - updated counts and future baseline traffic volumes at selected study intersections,
 - updated trip generation using the latest edition of the ITE Manual,
 - additional analysis of road corridor level of service,
 - additional analysis of the effects of project-specific mitigation measures on the road system, and
 - updated analysis of pro rata shares to mitigate identified improvements.
- **Utilities**
 - updated utility demand assumptions and utility capacity information.
- **Fiscal Conditions**
 - updated information from the public services analysis and other changes to the Revised Proposal.

Affected Environment

Chapter 3 updates existing conditions on the 47° North site and in the surrounding area since publication of the Draft SEIS in 2020, as appropriate.

EIS Alternatives

The proposal analyzed in the SEIS was SEIS Alternative 6; the current proposal is the Revised Proposal and that is the focus of the Addendum. The sections in **Chapter 3** (e.g., Section 3.1, **Land Use**) focus on the impacts of the Revised Proposal in comparison to SEIS Alternative 6, noting the incremental differences in impacts and their significance. Where informative, SEIS Alternative 5 (the approved 2002 Bullfrog Flats Master Site Plan) is also noted for comparison purposes.

Phasing/Study Years

Development of the Revised Proposal is anticipated to start in 2023 and be completed in 2031. Buildout of the residential and RV/glamping areas would occur by 2028, and the commercial center by 2031. For comparison, under SEIS Alternative 6, buildout of the RV/glamping sites and residential areas was also expected to occur by 2028; the commercial property (which was not part of the project at that time) was assumed to be fully developed by 2037.

The SEIS Addendum analyzes one or more of three development years – 2025, 2031, and 2037 – depending on the element being studied (e.g., Transportation analyzes all three years), as described below:

- **Year 2025** represents near-term development of the initial project phases of the Revised Proposal and SEIS Alternative 6 (e.g., residential and RV/glamping uses). Year 2025 is used primarily for analysis of transportation and fiscal impacts.
- **Year 2031** represents full buildout of the Revised Proposal, including the commercial center. Note that the RV and residential components of the Revised Proposal are anticipated to buildout in 2028. For SEIS Alternative 6, 2031 is an interim year, at the approximate mid-point of buildout; commercial uses included in this alternative would continue to develop until 2037. Therefore, 2031 includes buildout of SEIS Alternative 6 residential and recreational uses plus additional increments of commercial use and background growth.
- **Year 2037** represents a future year consistent with the current planning horizon of City of Cle Elum and Kittitas County Comprehensive Plans. No further development of the Revised Proposal would occur after 2031, but background growth would continue during this period.

Construction Impacts

For most of the elements of the environment (e.g., land use, aesthetics, parks and recreation, public services, and transportation) the analysis of the construction impacts from the Revised Proposal is not substantially different from the analysis of the SEIS

alternatives. The same type and amount of development would occur in a more compressed construction time frame but would result in no significant difference in impacts. The construction impacts under the Revised Proposal on numerous elements of the environment -- earth, water resources, plants, animals, & wetlands, and utilities -- also would not differ substantially from the SEIS Alternatives.,

Mitigation Measures

Compared to SEIS Alternative 6, no new significant adverse impacts on the elements of the environment would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures for the Revised Proposal identified in **Chapter 3** include some revisions to the language of measures listed in the Final SEIS and are intended to clarify and help identify processes for implementing the measures. There are no substantive additions or changes to the mitigation in the Final SEIS, however. The mitigation measures listed in **Appendix F** will serve as a basis for conditions that could be imposed through the review process for the proposed Major Modification and a revised Development Agreement.

Below is a description of the different categories of mitigation (e.g., proposed, required, other possible).

- **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”.

NATURAL ENVIRONMENT

Section 3.0

EARTH; WATER QUANTITY & QUALITY; PLANTS, ANIMALS, & WETLANDS; AIR QUALITY / GREENHOUSE GASES; & NOISE

The Natural Environment section is a summary of the *Natural Environment Technical Memos* on earth; plants, animals, and wetlands; and air quality/greenhouse gases (GHGs) and noise (December 2022) prepared by AESI Associates, Raedeke Associates, and Landau Associates, respectively, in **Appendix A**. Information from the *Utilities Report* (January 2023) prepared by ESM Engineers in **Appendix B** is also referenced.

3.0.1 Affected Environment

2020 / 2021 SEIS & Revised Proposal

The SEIS described the existing conditions of the site and vicinity with respect to earth, water quantity and quality plants, and animals, and wetlands air quality/ GHG; and noise conditions (see Draft SEIS Sections 3.1, 3.2, 3.3, 3.4, and 3.5 for details). Natural conditions of the site have not changed substantially since publication of the *SEIS* and are briefly described below. Please consult relevant sections of the SEIS document for detailed information.

The site topography is varied and includes steep slope areas along the south site boundary and through the center of the site. Geological hazards, such as landslide, erosion, seismic, and coal mines are present on and near the site. Surface water resources onsite include the Cle Elum River which passes through the western portion of the site and joins the Yakima River to the south of I-90 offsite, and six wetlands along the Cle Elum River and in the central portion of the site. The site is mostly covered by second and third growth forests; grassland with scattered shrubs are present in the two powerline easements that pass through the site. A variety of wildlife inhabit and pass through the site and site vicinity. Endangered, threatened, proposed, candidate, species of concern, and sensitive animal species identified by federal and state agencies potentially occur in the 47° North site vicinity. Priority species, such as elk, use the site during certain times of the year.

A major source of air pollution and noise in the vicinity of the 47° North site is vehicular traffic traveling along I-90, SR 903, and Bullfrog Road, as well as within residential areas surrounding the site. Kittitas County is currently designated as an attainment area for all criteria air pollutants. Air quality/GHG emissions and noise have increased slightly since 2020, primarily due to increased background traffic in the Cle Elum area (see Section 3.6, **Transportation**, and **Appendix C** for details.)

3.0.2 Impacts

The Revised Proposal includes minor changes to the proposed Master Site Plan which were reviewed by the SEIS consultants to determine whether impacts associated with these modifications are likely to generate new or different significant impacts. A technical memorandum prepared by each consultant documenting their review and conclusion are included in **Appendix A**. Each concluded that no significant impacts beyond those identified in the SEIS for SEIS Alternative 6 would result from the Revised Proposal. Please consult the SEIS for complete discussions of potential impacts. A brief discussion of incremental impacts associated with the Revised Proposal is presented below.

Revised Proposal

Earth

The proposed clearing limits under the Revised Proposal would essentially be the same as those under SEIS Alternative 6. These limits would be outside of designated erosion hazard areas, with clearing occurring on the more gently to moderately sloping portions of the site (e.g., with inclinations of approximately 33% or less). Proposed grading volumes and impervious surface areas under the Revised Proposal would be less than under SEIS Alternative 6. As a result, potential erosion, sedimentation, stormwater runoff, and groundwater impacts would be similar to or less than under SEIS Alternative 6. With the revisions to the stormwater design, the stormwater ponds would remain in the same general locations as under SEIS Alternative 6, with infiltration ponds continuing to be limited to those areas of the site underlain by permeable outwash sediments suitable for infiltration. As a result, no significant impacts associated with geotechnical hazards are expected. In summary, the proposed changes to the project under the Revised Proposal are relatively minor with respect to the geology, soils, and groundwater, and the impacts on these conditions would be similar to or less than SEIS Alternative 6.

Water Quantity & Quality

Like SEIS Alternative 6, no direct impacts to on-site water resources (e.g., the Cle Elum River and wetlands) would occur with development of the Revised Proposal. As mentioned above, proposed grading volumes and impervious surface areas under the Revised Proposal would be less than under SEIS Alternative 6, resulting in similar or less potential erosion, sedimentation, stormwater runoff, and groundwater impacts than SEIS Alternative 6. Temporary and permanent stormwater management systems would be installed onsite to address potential impacts during construction and operation of the project, respectively.

Plants, Animals, & Wetlands

Impacts to vegetation under the Revised Proposal would be comparable to SEIS Alternative 6, as the clearing limits would essentially be the same.

Clearing, grading, and construction under the Revised Proposal would be similar to SEIS Alternative 6 and would result in similar wildlife habitat loss and increased fragmentation. There would be slightly more activity onsite and associated impacts to wildlife due to the additional 50 housing units and population under the Revised Proposal. No direct impacts to riparian habitat in the Cle Elum or Yakima Rivers would occur, and infiltrated stormwater would not have a measurable direct effect on the Yakima River. Overall, impacts to fish and associated habitat should be minimal under the Revised Proposal or SEIS Alternative 6.

The Revised Proposal would not directly impact any of the on-site wetlands. As with SEIS Alternative 6, all wetlands onsite would be preserved and protected within an open space tract; these tracts would provide the required buffers and additional retained open space beyond the buffer limits. Hydrologic support to the wetlands would be maintained by the proposed stormwater control system.

Air Quality / GHGs

The inclusion of the 50 units of affordable housing and the slight change in the mix of commercial uses under the Revised Proposal would slightly increase emissions compared to SEIS Alternative 6. However, because the region is in attainment for all criteria pollutants, and because tailpipe emissions would increase only slightly, it is unlikely that impacts at local intersections would be significant or cause an air quality “hot spot.”

The increase in multi-family housing units and slight changes in commercial uses under the Revised Proposal would result in a negligible increase in potential greenhouse gas (GHG) emissions relative to SEIS Alternative 6. Forecast annual project emissions for both the Revised Proposal and SEIS Alternative 6 would represent 0.03% of 2035 statewide forecast emissions. The Revised Proposal would represent an increase of 0.001% of annual statewide forecast emissions. Emissions for both SEIS Alternative 6 and the Revised Proposal would be lower than for SEIS Alternative 5

Noise

The proposed changes under the Revised Proposal, including 50 more dwelling units and a change in the mix of commercial uses, are not expected to result in a change in short-term construction noise or long-term operational noise compared to SEIS Alternative 6. The revised Master Site Plan also does not include substantial changes in the location of residential, commercial, or RV resort uses that would change the sources or receivers of noise.

The Revised Proposal is not expected to result in significant changes to local roadway noise compared to SEIS Alternative 6 and would be less than with Alternative 5. The locations at which new project roadways would intersect with existing roadways and the distances between project roadways and existing sensitive land uses would be similar to SEIS Alternative 6. Potential changes in traffic noise were estimated by comparing project-related traffic estimates during the worst-case Sunday PM peak period at two roadway segments where traffic volumes would increase between 25 - 35% with the Revised

Proposal: (1) the RV resort access off Bullfrog Road, and (2) the site access off SR 903. The estimated changes in noise levels between SEIS Alternative 6 and the Revised Proposal would be 0.3 A-weighted decibels (dBA), which is imperceptible to the human ear. This change in modeled noise levels does not represent a change to the analysis in the SEIS.

3.0.3 Mitigation Measures

No new significant adverse impacts on the natural environment would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

Earth

Required Mitigation Measures

- 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.

Water Quantity & Quality

Proposed Mitigation Measures (Included in the Project)

Approved 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.

Plants, Animals & Wetlands

Proposed Mitigation Measures (Included in the Project)

Approved 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.

Air Quality/GHG

Proposed Mitigation Measures (Included in the Project)

- 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.

BUILT ENVIRONMENT

Section 3.1

LAND USE / RELATIONSHIP TO PLANS & POLICIES

3.1.1 Affected Environment

2020 / 2021 SEIS & Revised Proposal

The Bullfrog UGA Master Site Plan and Development Agreement included 1,100-acres owned by Trendwest at the time of approval, and subsequently owned by their successors in interest, Suncadia and New Suncadia. The SEIS described the existing land use conditions on and in the vicinity of the Bullfrog UGA properties (see Draft SEIS Section 3.6 for details). Selected information from the Draft SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

Approximately 174 acres of the Bullfrog UGA property has been dedicated to public agencies including 38-acres to the School District, 112 acres to the city for lease to the Washington State Horse Park, 12-acres to the city for the Water Treatment Plant, and most recently 12-acres to the city for the development of a community recreation facility. Sun Communities then acquired the balance of this property in 2021, with the exception of approximately one-acre used for utilities, retained by New Suncadia.

The property now owned Sun Communities, also known as the 47° North site, is largely vacant and undeveloped, and generally comprised of vegetated/forested areas. Horseback riding, hiking, and snowmobiling occur on dirt roads throughout the site; easements are in place for authorized use of the site and certain trails by the adjacent Horse Park. Equestrian facilities, such as a small building, parking area, and load/unload areas, are also located onsite. Puget Sound Energy and Bonneville Power Administration electrical transmission lines/easements traverse the site; other utility easements are present as well.

3.1.2 Impacts

2020 / 2021 SEIS

As described in the SEIS, development of the 47° North site under SEIS Alternative 6 or Alternative 5 would result in the conversion of a vacant, undeveloped, vegetated/forested site into a mix of urban land uses. Development of SEIS Alternative 6 would be less intensive than SEIS Alternative 5: fewer housing units would be developed; 25 acres/150,000 square feet of retail could be developed by another property owner, compared to 75 acres/950,000 square feet of business park and up to 10 acres of retail; and more undeveloped open space would be retained.

The range of proposed land uses and their densities with either SEIS Alternative 5 or 6 would result in increases in activity levels and potential land use incompatibilities, which can result from more intensive land uses. Proposed development would represent a continuation of the existing trend of intensifying development in the area (e.g., Suncadia Master Planned Resort, City Heights, and Cle Elum Pines developments). Land use conflicts were not anticipated to be significant under SEIS Alternative 6 due to the proposed layout of land uses, proposed open space and buffers incorporated into the site plan, and existing physical barriers within and adjacent to the site.

The anticipated land use impacts under SEIS Alternative 6 are discussed further below in comparison to the Revised Proposal.

Revised Proposal

Development with the Revised Proposal would be almost identical to SEIS Alternative 6, including the types, amounts and distribution of land uses on the site and resulting impacts. Like SEIS Alternative 6 and Alternative 5, the Revised Proposal would change the land use character of the 47° North site to a large mixed-use, master planned development. Please refer to **Table 2-1** for a summary of the proposed land uses under the Revised Proposal and SEIS Alternative 6, and **Figure 2-4** for the Revised Proposal Master Site Plan. The amount and intensity of development would be less compared to SEIS Alternative 5.

Proposed changes to the Revised Proposal compared to SEIS Alternatives 6 are identified in **Chapter 2** of this Addendum and are not expected to substantially change land use impacts identified in the SEIS. Any differences in impacts between SEIS Alternative 6 and the Revised Proposal that would result from the modification in land uses or timing of development were previously discussed and are considered minor and insignificant.

As under SEIS Alternative 6, development under the Revised Proposal would represent a transition of the 47° North site from a vacant, largely undeveloped, forested site to more intense urban land uses, consistent with the site's current designation as a UGA and the approved Master Site Plan.

As noted in **Table 2-1**, the Revised Proposal would feature a mix of land uses similar to those under SEIS Alternative 6 but would also incorporate 50 affordable housing units, which would be dispersed in the site's multi-family areas. Under either SEIS Alternative 5 or 6, a parcel adjacent to the Horse Park (6.8 or 7.5 acres, respectively) would be dedicated to the city for the development of 50 units of affordable housing by others. Under the Revised Proposal, this area would be retained as open space and the affordable housing units would be constructed and integrated into the overall development by Sun Communities.

The revised Master Site Plan included in the Revised Proposal includes a number of other small changes that would not affect the analysis of land use impacts. The layout of

residential uses relative to SEIS Alternative 6 has been modified somewhat. Under the Revised Proposal, multi-family rather than single family housing would be located adjacent to the commercial center. This change would result in greater compatibility between the residential and commercial uses, as the multi-family housing would be a more intensive use. The mix of commercial uses would also be somewhat different, but the overall amount of commercial uses (150,000 square feet) and resulting impacts would be the same (see **Table 2-2** for a comparison of the commercial uses under the Revised Proposal and SEIS Alternative 6).

The Revised Proposal includes a net increase in the amount of open space compared to SEIS Alternative 6 (approximately 77 acres more), and a greater percentage of the overall site devoted to open space compared to Alternative 5 (58% versus 48%). The preservation of more of the site in natural open space, predominately in the southern part of the site, would provide more buffering to adjacent uses (e.g., the Horse Park). The additional open space would also be more consistent with the Mountain-to-Sound Greenway recommendation that new development be designed for maximum preservation of the natural forested character of the lands, scenic qualities, and wildlife habitat.

As for SEIS Alternative 6, it is assumed that adopted development regulations, and mitigation measures adopted as conditions of approval, would minimize potential land use incompatibility impacts onsite and between the site and adjacent areas. As a result, no new significant adverse land use impacts are anticipated with the Revised Proposal.

Indirect and Cumulative Impacts

Indirect impacts under the Revised Proposal would be similar to those described for SEIS Alternative 6 and would include additional demand for goods and services due to the increase in onsite population with a potential to spur spin off commercial development (e.g., in the Cities of Cle Elum and Roslyn, and Town of South Cle Elum). Commercial development, which is now part of the project under the Revised Proposal, could capture a portion of the demand for these types uses from the 47° North development which would reduce the demand and indirect pressure for development elsewhere in the City of Cle Elum and other adjacent municipalities. The development of new retail opportunities within the boundaries of the Master Site Plan, including a new grocery store, could reduce congestion in the vicinity of the Safeway Store, and reduce the number of new trips that would be created.

Cumulative land use impacts would also be similar to SEIS Alternative 6. Development of the Revised Proposal combined with existing and known future development in the area would increase the total developed area and associated housing and population in Kittitas County and City of Cle Elum and represent a conversion and intensification of land use in the area. Cumulative development and associated cumulative population growth would increase activity levels and create additional demand for goods and services that could encourage spin-off development in the city and nearby urban areas, similar to SEIS Alternative 6.

3.1.3 Mitigation Measures

No new significant adverse impacts on land use would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

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).

Required Mitigation Measures

- 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.

3.1.4 Relationship to Plans and Policies

The SEIS discussed the relationship of SEIS Alternative 6 to relevant land use plans, policies, and regulations of Washington State, Kittitas County, City of Cle Elum, and neighboring cities/towns (i.e., the City of Roslyn and the Town of South Cle Elum) (see Draft SEIS Section 3.7 for details). As noted in this section and **Chapter 2**, the Revised Proposal is almost identical to SEIS Alternative 6, including the types and breakdowns of land uses, and the distribution of land uses on the site. However, there are some noted changes with the Revised Proposal, including: the inclusion of 50 affordable housing units; the inclusion of the 25-acre commercial property in the project area to be developed by Sun Communities; the addition of 78 acres of undeveloped open space; and a different development phasing plan (see **Table 2-1** for a summary comparison of land uses under SEIS Alternative 6 and the Revised Proposal). Due to the similarities in types, amounts, and layout of land uses on the site, it is anticipated that the Revised Proposal would be similarly consistent with relevant plans and policies as SEIS Alternative 6.

One significant change between the Revised Proposal and SEIS Alternative 6 is the construction, integration, and dispersal of 50 units of affordable housing into the project area to be developed by Sun Communities, rather than dedication of a site to the city for future development of 50 units of affordable housing by others. This is consistent with the provision in the Development Agreement giving preference to the dispersal of these units. This change would also enhance the consistency and compatibility of the Revised Proposal with applicable housing-related policies for the City of Cle Elum, including: the following

GOAL H-1 The City of Cle Elum includes a diverse mix of housing types that meets the needs and are affordable to all segments of its population, especially low and moderate-income households. The range of housing types also reflect market conditions, the City's rural setting, and small-town character.

Policy H-1.6 Promote the production of housing affordable for all incomes, through a mix of housing types, models, and densities throughout the City, including: small lot single family detached, zero lot line, attached housing, accessory units, cluster housing, cottages, duplexes, townhouses, and apartments, as well as manufactured housing units, that are compatible with the neighborhoods in which they are located.

Policy H-1.9 Require new multi-family or mixed-use projects involving 20 dwelling units or more to provide affordable dwelling units as part of the project.

Please consult Section 3.3, **Housing, Population, and Employment** of this Addendum for additional information about housing types and cost.

The Revised Proposal would also integrate the 25-acre commercial property into the project area to be developed by Sun Communities. The original Master Site Plan included a 75-acre business park, with limited provisions for commercial uses (a maximum of 10 acres). SEIS Alternative 6 assumed that the restrictions on commercial uses would be removed, the size of the area reduced to 25 acres, and that New Suncadia would retain ownership and develop this area separate from the balance of the project area. The integration of the commercial property into the Revised Proposal and its connection to residential uses via proposed trails and walkways would be consistent with relevant plans, policies, and zoning for the Planned Mixed Use (PMU) zone, including the following:

Policy LU-5.1 Assure that a broad and diverse range of products and services are available to the residents of the City of Cle Elum.

CEMC 17.45.010.A.1 To assure that large new development creates a complete and interdependent Cle Elum community that contains a mix of land uses that provides for most of the daily needs of its residences and visitors including recreation, employment, housing affordable to all residents, and education.

CEMC 17.45.010.A.2 To obtain development within the City with imaginative site planning in a compatible mixture of land uses that will encourage pedestrian rather than automotive access to employment opportunities and goods and services.

It is noted, however, the PMU zoning applicable to the site (CEMC 17.45.050.A) indicates that “retail and service uses shall be limited to those convenience retail and service uses that are sized and designed to serve the residents or employees of the PMU zone....”. Commercial uses in the Revised Proposal include a mix of grocery store, retail, restaurant, and office uses. These types of uses would serve the residents and employees of 47° North but would also provide a broader mix and greater amount of retail, service, and office uses that would also serve residents of Cle Elum and other nearby cities/towns. The City Council will determine, during its review of the proposed major amendment to the Master Site Plan and the Development Agreement, whether this element of the Revised Proposal meets the intent of applicable zoning provisions and serves the public interest.

Section 3.2

AESTHETICS / LIGHT & GLARE

3.2.1 Affected Environment

2020 / 2021 SEIS & Revised Proposal

The SEIS described the existing aesthetics and light and glare conditions on and in the vicinity of the 47° North site at that time (see Draft SEIS Section 3.8 for details). Selected information from the Draft SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

The 47° North site is largely vacant and undeveloped, and comprised of vegetated/forested land. Some dirt roads and a few equestrian trails and facilities, such as a small building, parking area, and load/unload areas, are also located onsite. Two PSE electrical transmission lines/easements traverse the site.

Although some development in the site vicinity and growth in vegetation onsite has occurred over the ensuing years, existing views of and from the 47° North site are generally the same as described in the SEIS.

3.2.2 Impacts

2020 / 2021 SEIS

As described in the SEIS, development of the 47° North site with any of the SEIS Alternatives would change the existing visual character of the site, potentially impact view opportunities to and from the site, and add new sources of light and glare to the area. SEIS Alternatives 5 and 6 would change the visual character of the site from a mostly second growth forest to a more urban environment consisting of a community with a mix of residential and recreational uses, business park and/or commercial development and open space in various proportions. Vegetated buffer areas would surround the perimeter of the site. Some of the more intensive uses of SEIS Alternative 6 (multi-family and potential commercial development) would be located in the northeastern and eastern portions of the site, near SR 903. RV resort uses would be situated in the central portion of the site, buffered from surrounding uses.

The primary visual change associated with proposed development under SEIS Alternative 6 or Alternative 5 would be the conversion of a large, forested area to urban density residential and recreational buildings and neighborhoods onsite, and to business park use in SEIS Alternative 5, or possible commercial development on the adjacent property with SEIS Alternative 6.

Visual simulations were prepared to illustrate potential views of the site under SEIS Alternative 6 from surrounding areas. Large portions of the site would be preserved in open space, and forested buffers would be retained along the perimeter of the site, including along Bullfrog Road, which would largely block views of proposed development on the 47° North site from immediately surrounding areas. The greatest potential to see the development would be from higher elevation vantage points such as from Peoh Point. As noted in the SEIS, individual residential, recreational, and smaller future commercial buildings in 47° North would be barely visible from Peoh Point.

The anticipated aesthetic impacts under SEIS Alternative 6 are discussed further below in comparison to the Revised Proposal.

Revised Proposal

Overall, visual impacts would be substantially similar to those identified for SEIS Alternative 6. The Revised Proposal would incrementally change the visual character of the site from a mostly second growth forest to a more urban environment consisting of a residential, recreational, and commercial development (the commercial area is now part of the proposal) and open space. Vegetated buffer areas would surround the perimeter of the site. The slight change in the location of the access road to the commercial center from SR 903 is not anticipated to result in any significant change in visual impact. Similar to SEIS Alternative 6, site development would be guided by architectural and design guidelines established by the Applicant for residential and other structures; these guidelines would be specifically tailored for the 47° North project site to achieve a consistent visual quality. As with SEIS Alternative 6, the greatest potential to see development on the site would be from higher elevation vantage points such as Peoh Point. And while development under the Revised Proposal would be visible at a distance in the mid-ground, the proposed development would appear as a continuation of the existing nearby grey/tan-colored development in the area and would likely be seen as a grey/tan shaded mass as well. Individual residential, recreational, and smaller commercial buildings in 47° North would be barely visible from Peoh Point. Impacts would be virtually the same as for SEIS Alternative 6.

The Revised Proposal would include up to 553 acres of open space areas – compared to 477 acres under SEIS Alternative 6 – which equates to 62% of the site (see **Table 2-1** in **Chapter 2** for details), compared to 48% of the site for SEIS Alternative 5. This open space would provide visual separation among uses within the site, and between the site and surrounding uses. Perimeter buffer areas at least 100 feet in width would be provided adjacent to Bullfrog Road and to contiguous properties to the south that are not owned or controlled by the Applicant (e.g., the Horse Park). Buffers would consist of existing trees and other vegetation and would provide visual separation between the site and adjacent uses and would screen and minimize potential visual impacts. The 50-foot-wide platted buffer

adjacent to the SR 903 right-of-way would be maintained as part of proposed commercial development, and could help maintain a natural, forested entry to the City of Cle Elum.

Landscaping would be provided throughout the site and would create transitions and buffers between various land uses on and adjacent to the site. Specific landscape plans have not been developed to date but will be included in the Master Site Plan amendment application. Conceptually, the Revised Proposal would include landscaping along both sides of the connector and internal roads, in pockets in the private community/recreation open space areas, and in the residential neighborhoods.

Light and glare impacts would also be similar to SEIS Alternative 6 or Alternative 5. The primary sources of light and glare from development associated with the Revised Proposal would include street, building, and landscape lighting. The Applicant has committed to adopting standards/ recommendations for roadway lighting intensity consistent with the Illuminating Engineering Society of North America; these standards would minimize impacts from development on adjacent land uses and include lighting standards for roadways. Light and glare would also be generated by RVs in the RV resort, particularly during the peak season.

Indirect and Cumulative Impacts

Similar to SEIS Alternative 6, indirect visual impacts associated with the Revised Proposal could result from induced growth and changes in surrounding land uses, such as a potential increase in commercial activity along the SR 903 corridor and within the City of Cle Elum. Any such impacts would be comparable to those identified for SEIS Alternative 6, would be less than with Alternative 5, and are assumed to occur, if at all, consistent with applicable land use and zoning designations.

Cumulatively, development of the Revised Proposal in conjunction with other known projects (i.e., Suncadia, City Heights, and Cle Elum Pines) would contribute to urbanization and continuing changes in the visual/aesthetic character of the site vicinity. Cumulative changes in the visual landscape would be most evident from higher elevation vantage points. Cumulative development would also 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.

3.2.3 Mitigation Measures

No new significant adverse impacts to aesthetics / light and glare would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a

description of the different categories of mitigation (e.g., proposed, required, other possible).

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.~~

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.

Section 3.3

HOUSING, POPULATION, & EMPLOYMENT

This section is based in part on the updated *Fiscal Assessment* (February 2023) prepared by ECONorthwest (see **Appendix E**).

3.3.1 Affected Environment

2020 / 2021 SEIS

The SEIS describes the existing housing, population, and employment conditions on and in the vicinity of the 47° North site as of 2020/2021 (see Draft SEIS Section 3.9 for details). Selected information from the Draft SEIS is described in context below; please consult the SEIS document for more detailed information.

2022 Revised Proposal

Changes that have occurred in housing, population, and employment conditions in the 47° North site vicinity since issuance of the SEIS are described below.

Kittitas County

The following information on housing and population trends in unincorporated Kittitas County over the last decade is included to provide additional context on local growth trends. In 2022 there were approximately 12,748 housing units in unincorporated Kittitas County, compared to 11,430 in 2010. The unincorporated County's current population is approximately 21,045 compared to 18,063 in 2010. (Washington OFM 2022)

City of Cle Elum

In 2022, there were approximately 1,175 housing units in the City of Cle Elum, about 5% more than at the time of the SEIS (Washington OFM 2022). The majority of housing in the city continues to be single family units (approximately 76%). In 2020, Cle Elum's Median Household Income (MHI) was \$46,989, a slight decrease from that documented in the SEIS. In 2020, approximately 20% of Cle Elum's population was living below the poverty level, compared to 17% in the County, and 10% of all persons in the state. For comparison, the 2020 federal poverty threshold for a family of four was \$26,200 (2020 ACS 5-year Estimates). In June 2022, the median value of all owner-occupied housing in Cle Elum was \$676,000, about 62% greater than in 2020 (June 2022 data from Zillow Home Value). Similar to the documentation in the SEIS, the increase in MHI did not grow as rapidly as the increase in median home value.

Since the SEIS was prepared, Cle Elum's population increased from 2,157 people (2020 Census) to an estimated population of 2,250 in 2022, an increase of 93 persons (18%) (Washington OFM 2022).

In 2020, there were approximately 1,154 people working in the City of Cle Elum, approximately 22% fewer employees than at the time of the SEIS (2020 ACS 5-year Estimates).

City of Roslyn & Town of South Cle Elum

Data on housing and population trends in the City of Roslyn and Town of South Cle Elum was not included in the SEIS but is presented here for informational purposes and to provide a context for potential indirect and cumulative impacts. Growth in these jurisdictions is also accounted for in several other sections of this Addendum (e.g., **Appendix B**, Utilities, **Appendix C**, Transportation; Section 3.7, **Public Services**).

In 2010, there were approximately 648 housing units in the City of Roslyn and approximately 271 housing units in the Town of South Cle Elum. Since that time, both jurisdictions have seen a slight decrease in the number of housing units. In 2022, the City of Roslyn contains approximately 5% fewer housing units, while the Town of South Cle Elum has approximately 3% fewer housing units than in 2010. Most of the housing units in these jurisdictions are single family housing units (93% in Roslyn and 66% in South Cle Elum) (Washington OFM, 2022).

Both the City of Roslyn and Town of South Cle Elum have experienced slight increases in their population since 2010. In 2010, Roslyn had a population of approximately 893 people and the South Cle Elum had a population of approximately 532 people. By 2022, Roslyn's population had increased by approximately 8% in this 12-year period, and the South Cle Elum's population had increased by approximately 6% (Washington OFM, 2022). The increase in population is due, at least in part, to an increasing rate of occupancy. The 2037 Growth Management Act (GMA) planning target for Roslyn population is 1,203, and for South Cle Elum a population of 1,059 (Kittitas County Comprehensive Plan, 2019).

Cumulative Impact Projects

Development of the cumulative impact projects (i.e., Suncadia Resort, City Heights, and Cle Elum Pines) has continued since the issuance of the SEIS. There have been no new vested projects in the City since 2020. Over the last two years, about 218 building permits have been issued for the Suncadia Master Planned Resort in the unincorporated Kittitas County, and about six permits in City of Cle Elum. This additional data is presented for informational purposes and is not used in a quantitative analysis because it represents a relatively short period of time. The data used in the cumulative impact analysis was collected over an extended period (up to 20 years). The recent data does indicate, however, that minimal growth has occurred in the City.

47° North Site

No development has occurred on the 47° North site since issuance of the SEIS, and the site does not contain any housing, population, or employment.

3.3.2 Impacts

2020 / 2021 SEIS

As described in the SEIS, SEIS Alternative 5 and 6 would develop the 47° North site with new residential units, in a range of housing types (single family and multi-family) and densities. Both would also reserve a 6.8-acre undeveloped property that would be dedicated to the city and developed by others in the future with 50 units of affordable housing. An RV resort was also proposed with SEIS Alternative 6 but would not include permanent residential units.

While the RV sites are not considered permanent, and would not generate permanent residents, an equivalent or “proxy” population¹ was calculated for these sites and used to estimate potential impacts to public services and other elements of the environment attributable to transient/recreational visitors. As discussed further in the Public Services section, and based on updated data, the proxy RV population estimate is considered to be conservative and likely overestimates or double counts some types of impacts.

Under SEIS Alternative 5 and 6, development of the project would involve a combination of local and non-local construction workers. Development of the residential and recreational areas onsite, as well as the RV resort, would generate new employees for operation of the site. Future development of the commercial area could also generate new employment on the site.

The anticipated housing, population, and employment from SEIS Alternatives 5 and 6 is discussed further below in comparison to the Revised Proposal.

2022 Revised Proposal

As in the SEIS, new development under the Revised Proposal would create new housing and generate new population and employees on the 47° North site. **Table 3.3-1** summarizes the proposed residential units, associated permanent population, and employees under SEIS Alternative 6 and the Revised Proposal; SEIS Alternative 5 is also noted for comparison purposes. Targets for additional housing and population in Cle Elum by 2037 from the City’s Comprehensive Plan are also shown.

¹ The proxy population calculated for the RV sites was based on an assumed average RV resort occupancy of 50% and three people per site, based on data provided by the Applicant reflecting occupancy at other projects throughout the U.S.

**Table 3.3-1
PERMANENT HOUSING, POPULATION & EMPLOYMENT –
SEIS ALTERNATIVE 6 & REVISED PROPOSAL (2037)¹**

	Residents/ Household ¹	Occupancy Rate ²	Proposed Additional Housing (units)	City of Cle Elum 2037 Addt'l Housing Target	Proposed Additional Permanent Population	City of Cle Elum 2037 Addt'l Population Target	Proposed Commercial or Business Park Dev. (sq. ft.) ¹	Proposed Commercial or Business Park Employees ¹	Proposed RV Resort Permanent/ Seasonal Employees	Proposed Total Employees
SEIS Alt. 5	2.34	90%	1,334	1,460	2,809	1,808	950,000	1,900 ¹	0	1,900
SEIS Alt. 6	2.34	90%	707	1,460	1,489	1,808	150,000	300	30 – 35/ 70 – 90 ²	400 – 425
Revised Proposal	2.37	88%	757	1,460	1,579	1,808	150,000	300 ⁵	30 – 35/ 70 – 90 ⁶	400 – 425
Revised Proposal w/o Affordable Hsg.	2.37	88%	707	1,460	1,475	1,808	150,000	300 ⁵	30 – 35/ 70 – 90 ²	400 – 425

Source: 2020/2021 SEIS, Sun Communities 2020, ECONW, 2020.

Note: Household sizes and occupancy rates for the Revised Proposal are based on the U.S. Census Bureau, 2016-2020, American Community Survey, 5-Year Estimates. The permanent residential units and associated residents are those at buildout of the residential area in 2028.

¹ The residents per household for SEIS Alt. 5 and 6 varies from that for the Revised Proposal because 2020 census data was used for the Revised Proposal.

² The occupancy rate for SEIS Alt. 5 and 6 varies from that for the Revised Proposal because 2020 census data was used for the Revised Proposal.

³ SEIS Alt. 5 included business park development on a 75-acre site. SEIS Alt. 6 analyzed and the Revised Proposal includes commercial development on a 25-acre. There would be more employees in the business park development under SEIS Alt. 5 than the commercial development under SEIS Alt. 6 and the Revised Proposal because there would be a substantially larger site and developed space and different types of uses that generate different numbers of employees (e.g., there could be light industrial uses under SEIS Alt. 5).

⁴ Sun Communities provided estimates for the anticipated employment numbers for the recreational facilities.

Construction

Like SEIS Alternative 6, construction of the Revised Proposal would involve a combination of local and non-local construction workers. Residential units would be constructed offsite as under SEIS Alternative 6, potentially in the Pacific Northwest. Proposed recreational buildings would be constructed onsite.

Operation

Housing

Under the Revised Proposal, 50 affordable housing units (rather than dedication of a site for future development of 50 affordable units by others) would be integrated into and dispersed on the project site to be developed by Sun Communities. The affordable housing would be located in the multi-family housing area onsite and would be developed and maintained by Sun Communities. For analysis purposes in this SEIS Addendum, housing and population are analyzed for the Revised Proposal with and without the 50 affordable housing units to help distinguish the impacts attributable to this element of the proposal.

The Revised Proposal would include a total of 757 new housing units (527 single family units and 230 multi-family units) at buildout in 2028; this total is 50 units greater (about 7%) than SEIS Alternative 6 and is attributable to the 50 units of affordable housing (see **Table 3.3-1**). The total planned residential units would fall within the City of Cle Elum's GMA 2037 planning target of an additional 1,460 housing units.

Without the affordable housing, the Revised Proposal would include the same number of units as SEIS Alternative 6, but a slightly higher population due to the revised occupancy estimate (see **Table 3.3-1**).

As with SEIS Alternative 6, it is assumed that except for the 50 affordable units, all housing under the Revised Proposal would be market rate. All the multi-family units are assumed to be rental units. Based on the Applicant's prior experience at other of its communities, it is expected that approximately 50% of the single family units would initially be rentals and 50% purchased, with an assumed 10% of the rental units being purchased each year. At full buildout, it is anticipated that approximately 10% of the single family homes would be rented (consistent with other communities in Sun Communities' portfolio).

The Revised Proposal would include the same number of RV/glamping sites as SEIS Alternative 6. As described in the SEIS, the RV sites are not considered permanent residential units and they would not be allowed to be used as housing of permanent residents (see the discussion of *Population* below for details).

The RV sites would generate temporary visitors to the site and the area. The following demographic information about RV users (PeakClub 2021) is provided for informational purposes:

- RV sales, and in turn RV site rentals, are greatest among those in the 55 to 64 age group (20% of sales), followed by the 65+ age group.
- RV purchasers are most likely to be middle class economically, making up about 2/3 of all owners and purchasers. This is largely because RVs represent a significant investment, with the average price of an RV currently at \$89,500;
- The majority of RV owners/purchasers tend to be college educated, married, and from households with average incomes of \$65,000 or greater.

The Revised Proposal would not directly result in the construction of any new housing in the City Roslyn or Town of South Cle Elum. It is possible that visitors to the RV resort could decide to relocate to Roslyn or South Cle Elum for their residence. This potential in-migration is speculative, however, and therefore the magnitude is unknown.

Overall, the incremental change in housing and its associated impacts under the Revised Proposal (as compared to SEIS Alternative 6) is not significant.

Population

The Revised Proposal could result in approximately 6% more population than SEIS Alternative 6 at buildout in 2028; this increase is due to updated assumptions for average residents per household and occupancy rates, and the integration of affordable housing by 2028 rather than development at some undetermined future date (see **Table 3.3-1**). Note that SEIS Alternative 5 (and the Bullfrog Flats approval) did not include or evaluate the 50 units of affordable housing that would be developed on the site dedicated to the city. The impacts of those 50 housing units would have been evaluated at some time in the future, whereas the Revised Proposal includes and evaluates those impacts as occurring by 2028. Without the additional affordable housing, the Revised Proposal's population would essentially be the same as SEIS Alternative 6 at residential buildout; any differences are explained by changes to assumptions about persons per household and occupancy rates based on 2020 census data used for the Revised Proposal). No additional population would be generated after 2028. The new permanent residents under the Revised Proposal would be within the City of Cle Elum's GMA 2037 planning target for population growth.

The Revised Proposal would include the same number of RV/glamping sites as SEIS Alternative 6. These sites would generate temporary visitors to the site and vicinity; no permanent residents would be allowed. For analysis purposes, a proxy RV site population has been calculated (the same proxy population as SEIS Alternative 6) to help estimate possible impacts associated with temporary visitors. The visitor population would vary with the season (see **Table 3.3-1**). This proxy population is used for analysis purposes in other sections of this SEIS Addendum (e.g., Section 3.7, **Public Services**, and **Appendix B**, Utilities). As noted previously and discussed further in the Public Services section, the proxy RV population estimate is considered to be conservative and likely overestimates or double counts some types of impacts.

The Revised Proposal would not directly add any new population to the City of Roslyn or Town of South Cle Elum or unincorporated Kittitas County. However, some of the visitors to the RV resort could possibly decide to relocate to neighboring jurisdictions, which would indirectly add to their population. This indirect population impact is considered speculative, however, and the magnitude and significance of any impact is unknown.

Population change in itself is not an adverse impact and overall, the incremental change in population and its associated impacts under the Revised Proposal (compared to SEIS Alternative 6) is not considered significant. The population increase associated with the approved Bullfrog UGA Master Site Plan, as evaluated in both the original EIS and the SEIS under SEIS Alternative 5, would be substantially greater (see **Table 3.3-1**).

Employment

Like SEIS Alternative 6, construction of the project would involve a combination of local and non-local construction workers.

Under the Revised Proposal, the 25-acre commercial property would be integrated into the project area developed by Sun Communities. It could include the same building area as SEIS Alternative 6 by buildout in 2031, although the types and amounts of uses would differ slightly. The commercial development is estimated to generate the same number of employees as SEIS Alternative 6 (see **Table 3.3-2**).

**Table 3.3-2
ESTIMATED COMMERCIAL AREA EMPLOYEES –
REVISED PROPOSAL (2028, 2031)**

	2028	2031
Grocery (sf)	50,000	50,000
Retail (sf)	42,000	56,000
Restaurant (sf)	18,000	24,000
Office (sf)	10,000	20,000
Total Employees¹	240	300

Source: Sun Communities, ECONW, 2022.

¹ Assumes one employee per 500 square feet for each commercial development type and 100% occupancy, the same assumption as in the SEIS.

The same numbers of year-round employees and seasonal employees would work in the RV resort under the Revised Proposal at buildout of the recreational areas in 2027 as under SEIS Alternative 6. Seasonal employees would be employed onsite during the peak RV resort season (typically June through August) (see **Table 3.3-1**).

Indirect and Cumulative Impacts

Similar to SEIS Alternative 6, cumulative housing and population impacts would occur with the Revised Proposal together with approved/vested development in the City of Cle Elum, unincorporated Kittitas County, and surrounding cities. Housing and population under the

Revised Proposal would be slightly greater than SEIS Alternative 6 — due to the addition of affordable housing units and some changes in underlying assumptions — but substantially less than Alternative 5 at buildout.

The additional housing units and associated population in Suncadia, together with the Revised Proposal, would result in cumulative housing and population in Kittitas County, similar to SEIS Alternatives 5 and 6. Likewise, the additional housing and associated population in City Heights and Cle Elum Pines, together with the Revised Proposal, would result in cumulative housing and population in the City of Cle Elum, similar to SEIS Alternatives 5 and 6. (See Draft SEIS Section 3.9 for details.) This cumulative development in the City of Cle Elum would exceed the City’s current housing and population targets, which again are not considered caps/limits on growth.

While the Revised Proposal would have slightly more residential units and population than SEIS Alternative 6, population growth is not per se an adverse impact and the incremental increase in population is not significant. To the extent that growth is properly planned for, and adequate housing, infrastructure, and services are provided, significant housing, population, and employment impacts can be avoided or reduced. Housing and population growth would be substantially less than with SEIS Alternative 5. As noted earlier in this section, between 2010 and 2022, population in unincorporated Kittitas County increased by almost 3,000 persons while the City of Cle Elum grew by 93. Other things being equal, a smaller project in the City, and one with a smaller employment component, would be likely to be a smaller impetus to indirect growth.

Like SEIS Alternative 6, the Revised Proposal could result in indirect impacts from additional housing and population associated with increased demand for public services and utilities and increased traffic. These indirect impacts could occur within the City of Cle Elum, as well as potentially in the City of Roslyn, the Town of South Cle Elum, and unincorporated Kittitas County; these impacts are discussed in other sections of this SEIS Addendum (e.g., **Appendix B**, Utilities, **Appendix C**, Transportation; and Section 3.7, **Public Services**).

Overall, the incremental changes in indirect and cumulative impacts under the Revised Proposal (compared to SEIS Alternative 6) are not considered significant.

3.3.3 Mitigation Measures

No new significant adverse impacts to housing, population, and employment would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

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.~~

Approved 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.

Approved Bullfrog Flats Conditions of Approval Not Included in the Proposal

- ~~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.

Section 3.4

CULTURAL RESOURCES

The Cultural Resources section is a summary of the *Cultural Resources Report* (September 2022) prepared by the Yakama Nation Cultural Resource Program (CRP). Because of its sensitive nature, this report was submitted directly to Washington State Department of Archaeology and Historic Preservation (DAHP) and consistent with state law, is not included in this Addendum. No additional investigation or analysis of the overall 47° North site was necessary or conducted.

3.4.1 Affected Environment

2020 / 2021 SEIS

The SEIS described the existing historic and cultural resources on and in the vicinity of the 47° North site at that time (see Draft SEIS Section 3.10 and Final SEIS Section 3-3 for details). The SEIS included a mitigation measure requiring that field investigation of the commercial property should be conducted when it is proposed for development.

Selected information from the Draft SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

Revised Proposal

Since the publication of the SEIS, all but one acre of the Bullfrog UGA properties owned by New Suncadia, including the 25-acre commercial development area, has been acquired by Sun Communities and is now included in the Revised Proposal. Cultural resources investigations were conducted on the commercial property for this SEIS Addendum. Following are background on and the results of the investigations.

Prehistoric/Historic Context

The 47° North site is situated within the traditional territory of the Sahaptin-speaking Kittitas and Yakama people. Other groups, such as the Southern Lushootseed-speaking Snoqualmie bands also may have overlapped with the Kittitas and Yakama. The first non-native settlers arrived in the Kittitas Valley in the 1840s. In an 1855 Treaty, the Yakamas ceded most of their ancestral land, including the future site of City of Cle Elum. Cattle ranching, mining, and logging were pursued in the Cle Elum area in the mid-1800s through the 1900s. More recently, the Cle Elum vicinity has become a recreational destination with the construction of nearby highways (e.g., I-90).

Previous Investigations

Previous, relevant archaeological investigations conducted within one mile of the proposed commercial development area are described below. The investigation conducted in 1998 for the MountainStar Resort (of which the 47° North site, including the commercial property, were originally a part) documented many resources within the larger proposed development, but no resources were identified within the project footprint. Three other surveys were performed within proximity to the commercial property. A timber sale survey conducted in 2005 of a property adjoining the property to the east resulted in the identification of two historic resources including the ranger station residence and an isolated telecommunication insulator. A survey conducted in 2019 to the south for the expansion of the Laurel Hill Cemetery identified an historic boundary marker and a discarded headstone. The most recent survey conducted in 2021 for the 47° North site found no new archeological resources.

Previously Recorded Sites

A review of the DAHP database for the presence of known cultural/archaeological sites was conducted. Within one mile of the commercial property, there are 26 previously recorded resources. All these resources are associated with historic use except for one precontact isolate. Many of these resources have been evaluated as not eligible to be listed on the National Register of Historic Places (NRHP), with seven having been recommended potentially eligible or eligible to the NRHP.

Historic Land Features

Based on a review of historic maps, historic land features which are present within the commercial property area include two historic roads. The roads branch from the east in the location where the town of Cle Elum would later be established. The northern road extends northwest towards Roslyn while the southern road extends southwest towards the Yakima River.

Several mining tunnels bisect the commercial property area. Railroads serving coal fields were also located nearby.

The parcel abutting the commercial property to the south remains owned by the City of Cle Elum and consists of the Laurel Hill Cemetery set aside in 1900.

One historic road is discernable at the southern extent of the commercial property extending from the transmission line, continuing east, and interconnecting with another road leading into the town of Cle Elum.

Site Investigation

A pedestrian survey was conducted in September 2022, using transects at 5-meter intervals covering the entire site. One historic road segment was documented (HP729063). The historic road extends approximately 0.6 mile. Approximately 260 feet of this segment lies within the commercial property. While precontact archaeological resources are protected

under State Law RCW 27.53, historic resources may be evaluated under federal criteria for eligibility to the NRHP. The road segment is not associated with a significant event, person, or represent the work of a master. The road segment is unlikely to yield additional information significant to the understanding of history beyond its recordation and is therefore recommended not eligible to the NRHP.

To assess the potential for buried cultural deposits, sub-surface testing was also conducted in September 2022. No buried cultural resources were identified during the testing.

No further work on the historic property is recommended by Yakama Nation CRP.

3.4.2 Impacts

2020 / 2021 SEIS

Archaeological sites that are located onsite have been determined to be not eligible for listing on the NRHP or Washington Historic Register (WHR); therefore, significant impacts to known cultural resources are not expected. Under SEIS Alternatives 5 and 6, large areas of open space would be preserved, including along the Cle Elum River where most of the previously recorded sites were located; the Cle Elum River open space corridor is protected by a conservation easement. As described in the SEIS, unknown/unidentified cultural resources could potentially be impacted or destroyed by proposed site development under SEIS Alternative 6 and SEIS Alternative 5; this is also true for practically any site and inadvertent discovery protocols are established by State law and proposed mitigation.

Revised Proposal

No archaeological sites or resources were identified on the commercial property. Therefore, significant impacts to known cultural resources are not expected. However, ground disturbing activities, including clearing, grubbing, grading, and construction excavations, would be required for development of the commercial property which could inadvertently unearth unknown cultural or archaeological material. If any ground disturbing activities results in the inadvertent discovery of cultural or archaeological material, work would be stopped in the immediate area and contact would be made with DAHP and Yakama Nation CRP. Work would remain suspended until the find is assessed, and appropriate consultation is conducted.

While no prehistoric Native American archaeological materials were identified in the vicinity of the commercial property, such materials could be discovered during development of the overall 47° North project of which the commercial property is a component. Onsite monitoring (e.g., by Yakima Nation CRP) would take place during all ground disturbing activities with potential to intersect Holocene deposits where archaeological materials could be present, which were observed up to 8.5 feet below ground surface.

3.4.3 Mitigation Measures

No new significant adverse impacts on cultural resources would occur from the Revised Proposal and no additional mitigation measures are required. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the Final SEIS and one new voluntary measure. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

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

- 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.

Section 3.5 PARKS & RECREATION

3.5.1 Affected Environment

2020 / 2021 SEIS & Revised Proposal

The SEIS described the existing parks and recreation conditions on and in the vicinity of the 47° North site at that time (see Draft SEIS Section 3.11 for details). Selected information from the Draft SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

The 47° North site is largely vacant and undeveloped, and comprised of vegetated/forested land. Horseback riding, hiking, and snowmobiling occur on dirt roads throughout the site. Easements are in place for authorized use of the site and certain trails by the adjacent Washington State Horse Park. Some authorized equestrian facilities, including a small building, parking area, and load/unload areas, are also located onsite. Other recreational uses that take place onsite are informal and occur without the permission of the property owner. An approximate 12-acre area in the north part of the Bullfrog Flats property has been removed from the master plan site and dedicated to the City for a municipal recreation center (see **Chapter 2** of this Addendum for details).

3.5.2 Impacts

2020 / 2021 SEIS

Development of the 47° North site under either of the SEIS Alternatives would result in new housing and population and the creation of new jobs, which would generate associated increases in demand for parks and recreation areas and facilities. SEIS Alternatives 5 and 6 include public trails, parks, and open space, which would accommodate some likely demand. Anticipated parks and recreation areas and facilities under SEIS Alternatives 5 and 6 are quantified and described further below in comparison to the Revised Proposal.

Revised Proposal

The Revised Proposal would generate incrementally greater demand for recreation areas and facilities compared to SEIS Alternative 6 due to an increase in housing units and associated population. The Revised Proposal would include several recreation areas and facilities on the 47° North site, similar to SEIS Alternative 6. **Table 3.5-1** summarizes parks, trails, and recreational facilities included in SEIS Alternatives 5 and 6, and the Revised Proposal. A few items should be noted. SEIS Alternative 6 and the Revised Proposal provide relatively specific information about planned facilities, whereas SEIS Alternative 5 is more

**Table 3.5-1
REQUIRED & PROPOSED PARK & RECREATION FACILITIES**

Parks/Recreation Facility	City Park Plan Target/Goal (2037)	SEIS Alt. 5 Required (2037) ¹	SEIS Alt. 5 Proposed	SEIS Alt. 6 Required (2037) ²	SEIS Alt. 6 Proposed	Revised Proposal Required ³	Revised Proposal Proposed
Active parks	6 acres/1,000 people	14.0 acres	19.6 acres ⁴	8.9 acres	19.5 acres ⁵	9.5 acres	20 acres ⁶
Open space	9 acres/1,000 people	21.1 acres	524 acres	13.4 acres	476.7 acres	14.2 acres	553 acres
Tracks, trails, & connections	4 miles/1,000 people	9.4 miles	Unknown	6.0 miles	Approx. 6 miles	6.3 miles	Approx. 6.0 miles
Park restrooms	1 per park	Unknown	Unknown	8 restrooms	Provided	Unknown ⁹	To be Determined ⁹
Park & trail head water fountains	1 per park/trailhead	Unknown	Unknown	8 water fountains	Provided	Unknown ⁹	Unknown ⁹
Aquatic facility	1 citywide ⁷	N/A	Unknown	N/A	Provided ⁸	N/A	To be Determined ⁸
Basketball courts	8 citywide ⁷	N/A	Unknown	N/A	None	N/A	None
Soccer fields	4 citywide ⁷	N/A	Unknown	N/A	None	N/A	None
Tennis courts	4 citywide ⁷	N/A	Unknown	N/A	Possibly Provided ⁹	N/A	To be Determined ¹⁰

Source: City of Cle Elum Parks, Recreation, and Open Space Plan, February 2018.

- ¹ A permanent population of 2,340 was assumed for SEIS Alt. 5 by year 2037; full buildout of this alternative was assumed to occur in 2051. 2037 was used for comparison and to be consistent with the SEIS Alt. 6 full buildout date.
- ² A permanent population of 1,489 was assumed for SEIS Alt. 6 in year 2037. RV resort visitors would contribute to the need for parks and recreational facilities; however, since these would not be permanent residents, and the entire RV resort could be considered a recreational amenity, the RV visitors were not included in the analysis.
- ³ A permanent population of 1,579 is assumed for the Revised Proposal. See Section 3.3, **Housing, Population, and Employment**, for details on this calculation of population. Like SEIS Alt. 6, the RV visitors were not included in the analysis.
- ⁴ SEIS Alt. 5 would include the following Active Parks:
- Neighborhood Clubhouse and Lake: 18 acres
 - Mini Parks: 1.6 acres
19.6 acres
- ⁵ SEIS Alt. 6 would include the following Active Parks:
- Adventure Center (one): 6.0 acres
 - Private Amenity Centers (one 6-acre/one 5-acre) 11.0 acres (total)
 - Public Trail Parks (three) 1.5 acres (total)
 - Private Community Trail Parks (two) 1.0 acres (total)
19.5 acres
- ⁶ The Revised Proposal would include the following Active Parks:
- Private Amenity Centers (one 6-acre in residential area/ 5 acres throughout the RV resort) 11.0 acres (total)
 - Public Trail Head Park (one) 6.0 acres (total)
 - Public Trail Parks (three) 2.0 acre (total)
 - Private Parks/Pocket Parks (multiple) 1.0 acres (total)
20.0 acres
- ⁷ These are city-wide targets/goals and do not necessarily apply to specific development projects.
- ⁸ SEIS Alt. 6 and the Revised Proposal would include private Amenity Centers, which could include pool(s).
- ⁹ The Amenity Centers and Community Parks under SEIS Alt. 6 and the Revised Proposal would include sport courts.
- ¹⁰ The quantities of required and proposed restrooms and water fountains would be determined in coordination with the City.

general and does not quantify some recreation facilities included in **Table 3.5-1**. In addition, Sun Communities has transferred a site and funds for a community recreation facility to the City; this was a condition of the 2002 UGA approval and has been fulfilled. This could result in some consolidation of aquatic and other facilities between 47^o North and the future City facility.

The Revised Proposal would generate incrementally greater demand for parks and recreational facilities compared to SEIS Alternative 6 and less demand than SEIS Alternative 5 assuming that demand is measured based on population. The Revised Proposal includes 90 people more than SEIS Alternative 6 and 1,230 people less than SEIS Alternative 5. The increased population associated with the Revised Proposal, including RV resort visitors, would increase the demand on regional resources such as camping, fishing, and hiking areas within nearby National Forests and Wilderness areas, on park and recreational resources in Kittitas County, and on local playfields within the Cle Elum vicinity.

As noted in the Public Services section discussion in the Addendum, the RV proxy population estimate used to calculate demand for various services and facilities is conservative and likely overstates the demand associated with this component of Alternative 6 and the Revised Proposal. RV visitors would use the recreational amenities provided on the project site, which would relieve some portion of potential use of off-site recreation facilities.

Public and private park and recreation amenities that are included in the Revised Proposal are summarized in **Table 3.5-1** and compared to City of Cle Elum city-wide targets from the City of Cle Elum Parks, Recreation, and Open Space Plan (2018), as well as to SEIS Alternatives 5 and 6. The active parks and open space provided under the Revised Proposal would slightly exceed SEIS Alternative 6 and SEIS Alternative 5, and exceed applicable city-wide targets/goals. A network of trails and sidewalks would also be included throughout the site under the Revised Proposal that would be similar to SEIS Alternative 6 and to the city-wide goal/target for tracks, trails, and connections. Overall, impacts would be similar to those identified for SEIS Alternative 6. In sum, park and recreation facilities provided in the Revised Project would exceed City standards.

The Horse Park has requested that safe and functional trails and public parks on the 47^o North site be made available, and in some cases controlled, for equestrian use by the Horse Park. The Applicant addressed this request in the revised Master Site Plan. An approximately 55-acre area to the south of the site, adjacent to the Horse Park, has been added to the master plan. The Revised Proposal designates this area as open space with trails. This area was part of the Reserve Area under SEIS Alternative 5 but was not included in SEIS Alternative 6.

The park and recreational facilities onsite would be constructed, owned, and maintained by Sun Communities. However, horse trails or specific riding courses permitted by Sun Communities would be constructed and maintained by the Horse Park.

Indirect and Cumulative Impacts

Similar to SEIS Alternative 6, new development and residential population under the Revised Proposal, in combination with the cumulative impact projects (i.e., Suncadia, City Heights, and Cle Elum Pines) would increase the use of off-site recreation areas and amenities. The provision of recreation facilities and amenities within these developments would satisfy some of the demand from the projects, but cumulatively would also attract additional visitors to the area that could increase the use of recreation areas and amenities in proximity to the projects.

3.5.3 Mitigation Measures

No new significant adverse impacts on parks and recreation would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measures identified below include those measures that have been updated for the Revised Proposal from those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

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.

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

- 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.

Section 3.6

TRANSPORTATION

The Transportation section is a summary of the *Transportation Report* (January 2023) prepared by Transportation Engineering Northwest (TENW) in **Appendix C**.

3.6.1 Affected Environment

2020 / 2021 SEIS

The SEIS described the existing transportation conditions on and in the vicinity of the 47° North site at that time (see Draft SEIS Section 3.13 and Final SEIS Section 3-2 for details). Selected information from the Draft and Final SEIS is provided and compared in context below; please consult these SEIS documents for more detailed information.

Revised Proposal

The 47° North site is served by I-90 to the south, Bullfrog Road to the northwest and west, and SR 903 (2nd Street) to the northeast. No development has occurred on the site since 2020. The SEIS Addendum studies the same 27 intersections that were studied in the Draft and Final SEIS, plus the proposed site accesses on Bullfrog Road and SR 903. To be consistent with the SEIS, the updated transportation analysis evaluates future years 2025, 2031, and 2037 during the weekday, Friday, and Sunday PM peak periods, with 2025 representing an early development phase of the Revised Proposal, 2031 representing full buildout, and 2037 the horizon year for City of Cle Elum's and Kittitas County's Comprehensive Plans and post-completion of the Revised Proposal.

Supplemental summer peak hour traffic volumes were collected at ten study intersections in July 2022 for the weekday, Friday, and Sunday PM peak periods. The supplemental traffic volumes showed that the weekday PM peak period annual background traffic growth that occurred between 2019 and 2022 at study intersections along Bullfrog Road (#1-6) was higher than the SEIS anticipated to occur between 2019 and 2025. As a result, the 2025, 2031, and 2037 'Baseline' condition (with background growth but without the Revised Proposal) traffic volumes at these six intersections along Bullfrog Road were updated for the weekday PM peak hour only (see **Appendix C** for details). The background traffic growth that occurred between 2019 and 2022 at all other study intersections during the weekday PM peak hour was consistent with the forecast annual growth anticipated to occur between 2019 and 2025. Additionally, the background traffic growth that occurred between 2019 and 2022 at the ten study intersections during the Friday and Sunday peak hours was reexamined and determined to be consistent with the forecast annual 'baseline' traffic growth anticipated to occur by 2025 and were not adjusted.

‘Baseline’ Intersection Level of Service

‘Baseline’ intersection level of service (LOS) (i.e., without the project) was updated at the six study intersections along Bullfrog Road and compared to the established LOS standards: LOS C for WSDOT intersections on I-90 and SR 903, LOS C for intersections within the City of Cle Elum, and LOS D for intersections within the rural areas of Kittitas County (including Bullfrog Road).

Weekday Summer PM Peak Hour

Of the six study intersections with updated ‘Baseline’ volumes along Bullfrog Road, the following intersections are expected to operate at non-compliant LOS for future ‘Baseline’ conditions during the summer weekday PM peak hour in 2037:

- #1 - Bullfrog Road / I-90 EB Ramps – LOS F by 2037 (*identified as LOS D by 2037 in the Final SEIS*)
- #2 - Bullfrog Road / I-90 WB Ramps – LOS D by 2037 (*identified as compliant in the Final SEIS*)

Data for weekend summer PM peak hour, intersection LOS is presented in **Appendix C**.

Collisions History/Traffic Safety

The collision history summarized in the Final SEIS remains unchanged.

3.6.2 Impacts

2020 / 2021 SEIS

As described in the SEIS, SEIS Alternative 6 would generate temporary construction-related traffic impacts over buildout of the project. Construction traffic impacts would be shorter and more condensed under SEIS Alternative 6 than under SEIS Alternative 5 because of the shortened buildout period. Proposed development under the SEIS Alternatives would increase traffic volumes and congestion on area roadways (e.g., in the City of Cle Elum, Kittitas County, and on state facilities such as SR 903, SR 907, and I-90); this is identified as an unavoidable effect of urban development. The LOS analysis in the SEIS indicated that several of the studied intersections would exceed LOS standards during the PM summer peak hours in the future analysis years (2025, 2031, and 2037) with the additional traffic generated by SEIS Alternatives 5 and 6; some of these intersections would also exceed the LOS standards without the project (e.g., in the ‘Baseline’ scenario) due to continued growth in background traffic. Mitigation measures would offset or reduce significant adverse transportation impacts under SEIS Alternative 6.

Revised Proposal

This section compares the Revised Proposal to SEIS Alternative 6. In some cases, level of service, and the year mitigation is needed at the studied intersections may have changed

with the Revised Proposal, but there are no new off-site mitigation requirements when compared to the off-site mitigation measures identified with SEIS Alternative 6 as reported in the Final SEIS. It should be noted that the Bullfrog Road/RV Access Road intersection is a new mitigation measure in the updated transportation analysis as a result of additional background growth on Bullfrog Road. However, all intersections providing access to 47° North will be designed to meet applicable level of service standards and are included in the proposal.

Site Access & Circulation

Site access and circulation with the Revised Proposal would generally be the same as with SEIS Alternative 6 except that the Revised Proposal site access on SR 903 would now align with Bala Drive on the north side of SR 903; this access was offset in SEIS Alternative 6. There would also be some changes to the design of the onsite Connector Road (see **Chapter 2** for details).

Trip Generation

Trip generation for the Revised Proposal was updated based on the revised 47° North land use proposal and site plan, which include 50 affordable housing units and the integration of commercial development in the project. Additionally, the trip generation was updated for the revised 47° North proposal to reflect the updated development timeline (full buildout by 2031) using the latest edition of the ITE *Trip Generation Manual* (11th Edition).

Table 3.6-1 compares the total net new trip generation estimates for SEIS Alternative 6 and the Revised Proposal. As shown, the total net new trips generated by the Revised Proposal in 2025 is estimated to be 141 trips higher (+24%) during the weekday and Friday PM peak hours and 149 trips higher (+29%) during the Sunday peak hour than SEIS Alternative 6. The increase in the year 2025 trip generation for the Revised Proposal is primarily a result of the increase in commercial land uses that would be developed by 2025 compared to what was assumed for SEIS Alternative 6.

As also shown in **Table 3.6-1**, with full buildout of 47° North in 2031, the total net new trip generation under the Revised Proposal is estimated to be 77 trips higher (+6%) during the weekday and Friday PM peak hours and 316 trips higher (+31%) during the Sunday peak hour than SEIS Alternative 6. This increase in the full buildout Sunday project trip generation for the Revised Proposal is a result of the change in the mix of commercial land uses compared to Alternative 6, i.e., a reduction in office uses, which generate minimal trips on a Sunday, and an increase in retail/restaurant use. The 50 affordable housing units under the Revised Proposal are estimated to account for 1.4 to 1.6% of the total trip generation between 2025 and 2031.

**Table 3.6-1
TRIP GENERATION COMPARISON –
REVISED PROPOSAL & SEIS ALTERNATIVE 6**

Total Net New Trip Generation						
SEIS ALTERNATIVE 6			REVISED PROPOSAL			
Year	Weekday	Friday	Sunday	Weekday	Friday	Sunday
2025	580	580	506	721	721	655
Full Buildout¹	1,225	1,225	1,012	1,302	1,302	1,328

Source: TENW, 2023.

¹ Full Buildout of the Revised Proposal is assumed to occur by 2031. Full Buildout of SEIS Alternative 6 was assumed to occur by 2037 in the SEIS.

Note that weekday trip generation at buildout for SEIS Alternative 5 is estimated at 1,826 trips, or approximately 30% greater. Sunday trips would be lower, however, due to the absence of retail land uses in Alternative 5.

Intersection LOS

The Revised Proposal project trip generation for future years 2025, 2031, and 2037 for the weekday PM peak hour, Friday PM peak hour, and Sunday peak hour was assigned to the road system based on the project trip distribution and assignment documented in the SEIS.

Intersection LOS analysis results with the Revised Proposal for future years 2025, 2031, and 2037 during the weekday PM peak hour in the peak summer period are summarized in **Table 3.6-2**; the intersection analysis results for the Revised Proposal are compared to those for the 'Baseline' (without project) and SEIS Alternative 6. See Tables 8 and 9 in **Appendix C** for the intersection analysis results for the same future years during the summer Friday and Sunday PM peak hours.

Study intersections forecast to operate at non-compliant LOS are shown in bold text in **Table 3.6-2**. Study intersections forecast to operate at non-compliant LOS with the Revised Proposal that were not identified to operate at a non-compliant LOS with SEIS Alternative 6 are shown as bold, purple text with purple highlight. Study intersections forecast to operate at non-compliant LOS during the weekday summer PM peak hour with the Revised Proposal are used to identify potential improvements to meet the adopted LOS standards in the *Mitigation Measures* section. The LOS results are discussed in more detail below.

Weekday Summer PM Peak Hour

As a result of the updated future 'Baseline' traffic volume forecasts along Bullfrog Road, one intersection is anticipated to operate at a non-compliant LOS in the updated transportation analysis that operated at a compliant LOS for future 'Baseline' conditions in the Final SEIS:

- #2 - Bullfrog Road/I-90 WB Ramps – LOS D by 2037 (*identified as LOS E by 2037 with SEIS Alternative 6*)

As shown in **Table 3.6-2**, the same four intersections that operated at non-compliant LOS for future 'Baseline' conditions in the Final SEIS during the summer weekday PM peak hour would operate at non-compliant LOS in the updated transportation analysis:

- #8 - Ranger Station Road / Miller Avenue / W 2nd Street (SR 903) – LOS D by 2025
- #11 - Douglas Munro Boulevard / W 1st Street – LOS E by 2025
- #12 - N Pine Street / W 1st Street – LOS D by 2025
- #13 - N Stafford Avenue / W 2nd Street (SR 903) – LOS E by 2025

Additionally, the same six intersections that would operate at non-compliant LOS during the summer weekday PM peak hour with SEIS Alternative 6 would operate at non-complaint LOS with the Revised Proposal:

- #1 - Bullfrog Road / I-90 EB Ramps – LOS F by 2031 (*identified as LOS D by 2031 with SEIS Alternative 6*)
- #3 - Bullfrog Road / Tumble Creek – LOS E by 2031 (*identified as LOS F by 2037 with SEIS Alternative 6*)
- #7 - Denny Avenue / W 2nd Street (SR 903) – LOS D by 2025 (*identified as LOS E by 2031 with SEIS Alternative 6*)
- #9 - N Pine Street / W 2nd Street (SR 903) – LOS F by 2025 (*identified as LOS D by 2025 with SEIS Alternative 6*)
- #15 - N Oakes Avenue / W 2nd Street (SR 903) – LOS E by 2025 (*identified as LOS D by 2025 with SEIS Alternative 6*)
- #21 - Pennsylvania Avenue / N 1st Street (SR 903) in Roslyn – LOS E by 2031 (*identified as LOS D by 2031 with SEIS Alternative 6*)

Overall intersection delay may have increased at some locations and the year mitigation is needed at intersections may have changed with the Revised Proposal; however, there are no new intersections beyond those identified in the SEIS that would operate at non-compliant LOS during the summer weekday PM peak hour compared to SEIS Alternative 6.

Additionally, due to the updated future 'Baseline' traffic volume forecasts along Bullfrog Road, one of the intersections that was previously reported to operate at a non-compliant LOS with SEIS Alternative 6 would now operate at a non-compliant LOS under the future 'Baseline' condition (without the project).

Table 3.6-2
INTERSECTION LOS SUMMARY – WEEKDAY PM PEAK HOUR (SUMMER) – REVISED PROPOSAL

		Weekday PM Peak Hour Conditions (Summer Peak)																	
		Year 2025						Year 2031						Year 2037					
		“Baseline”		With SEIS Alt 6		With Revised Proposal		“Baseline”		With SEIS Alt 6		With Revised Proposal		“Baseline”		With SEIS Alt 6		With Revised Proposal	
Study Intersection	LOS Standard	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹
Signalized																			
14. S Cle Elum Way / Stafford / W 1 st St	C	B	11.5	B	12.0	B	12.4	B	12.8	B	13.7	B	13.6	B	13.8	B	14.6	B	14.6
16. N Oakes Ave / W 1 st St (SR 903)	C	B	10.4	B	10.8	B	11.1	B	11.7	B	13.0	B	13.0	B	15.9	C	21.1	C	21.6
18. Pennsylvania Ave / 1 st St (SR 903)	C	A	7.6	A	7.5	A	7.7	A	8.0	A	8.6	A	9.3	A	9.1	B	10.7	B	10.8
Roundabout																			
4. Bullfrog Rd / Suncadia Trail ²	D	A	6.3	A	5.6	A	7.3	A	7.2	A	7.5	A	9.9	A	8.9	B	10.3	B	13.1
6. Bullfrog Rd / W 2 nd St (SR 903) ²	C	A	7.9	A	6.8	A	9.2	A	8.8	A	8.0	B	11.4	B	10.1	A	9.7	B	13.4
All-Way Stop-Controlled																			
17. Pennsylvania Ave / 2 nd St	C	A	9.6	B	10.1	B	10.4	B	11.9	B	14.3	B	13.6	C	16.8	C	20.6	C	21.0
Two-Way Stop-Controlled ³																			
1. Bullfrog Rd / I-90 EB Ramps ²	C	C	15.8	C	15.3	C	21.4	C	24.1	D	30.4	F	88.7	F	54.8	F	> 100	F	> 100
2. Bullfrog Rd / I-90 WB Ramps ²	C	B	11.8	B	11.7	B	13.4	B	15.0	C	16.9	C	24.8	D	28.4	E	42.1	F	88.0
3. Bullfrog Rd / Tumble Creek Dr ²	D	C	16.3	B	13.9	C	20.0	C	20.3	C	23.9	E	39.9	D	33.6	F	61.1	F	> 100
5. Bullfrog Rd / Firehouse Rd ²	D	C	15.3	B	12.5	C	18.0	B	14.6	B	13.4	C	17.9	B	14.9	B	14.0	C	18.4
7. Denny Ave / W 2 nd St (SR 903)	C	C	16.6	C	23.3	D	28.2	C	20.1	E	38.1	E	42.6	D	25.8	F	65.5	F	70.5
8. Ranger Sta Rd / Miller / W 2 nd (SR 903)	C	D	26.1	F	95.7	F	> 100	E	47.8	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100
9. N Pine St / W 2 nd St (SR 903)	C	C	18.1	D	33.3	F	53.3	C	23.5	F	> 100	F	> 100	D	27.4	F	> 100	F	> 100
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	7.7	A	7.9	A	8.0	A	7.9	A	8.3	A	8.4	A	8.4	A	9.0	A	9.0
11. Douglas Munro Blvd / W 1 st St	C	E	46.2	F	56.1	F	67.3	F	74.7	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100
12. Pine St / W 1 st St	C	D	27.9	D	30.4	D	32.9	D	27.9	D	32.9	E	38.5	E	35.2	F	51.7	F	53.8
13. N Stafford Ave / W 2 nd St (SR 903)	C	E	46.7	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100
15. N Oakes Ave / W 2 nd St (SR 903)	C	C	20.3	D	33.3	E	42.4	E	45.0	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100
19. Oakes Ave / I-90 EB Off-Ramp	C	A	9.7	A	9.8	A	9.9	B	10.2	B	10.6	B	10.6	B	10.8	B	11.3	B	11.3
20. Oakes Ave / I-90 EB On-Ramp	C	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0	A	0.0
21. SR 903 / E Pennsylvania Ave	C	C	19.3	C	21.7	C	22.1	C	22.1	D	29.3	E	36.1	D	25.4	E	42.6	E	45.0
22. SR 903 / Pacific Ave	C	B	12.0	B	12.8	B	12.9	B	14.5	C	16.8	C	17.9	C	17.2	C	22.2	C	22.5
23. Rock Rose Rd / Morrel Rd / SR 903	C	B	10.7	B	11.0	B	11.0	B	11.2	B	11.9	B	12.2	B	12.2	B	13.2	B	13.3

Source: *TENW, 2023.*

¹ LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, purple text with purple highlight indicates changes in non-compliant LOS intersections compared to the *Final SEIS*.

² Include changes to LOS results from the *Final SEIS* due to updated ‘Baseline’ traffic volumes along Bullfrog Road.

³ LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Friday Summer PM Peak Hour

As shown in Table 8 in **Appendix C**, the same five intersections that operated at non-compliant LOS for future 'Baseline' conditions in the Final SEIS during the summer Friday PM peak hour would continue to operate at non-compliant LOS with the Revised Proposal (i.e., future 'Baseline' traffic volumes and LOS results are consistent with the Final SEIS during the Friday PM peak hour).

Additionally, the same seven intersections that would operate at non-compliant LOS during the summer Friday PM peak hour with SEIS Alternative 6 would operate at non-complaint LOS with the Revised Proposal.

As described above for the summer weekday PM peak hour, although overall intersection delay may increase at some locations with the Revised Proposal, there would be no new intersections operating at non-compliant LOS during the summer Friday PM peak hour compared to SEIS Alternative 6 and identified in the SEIS. Overall, therefore, the impacts of the Revised Proposal identified in this Addendum are consistent with the analysis of impacts in the SEIS.

Sunday Summer PM Peak Hour

As shown in Table 9 in **Appendix C**, the same ten intersections that were reported in the Final SEIS to operate at non-compliant LOS for future 'Baseline' conditions (without the project) during the summer Sunday PM peak hour would operate at non-compliant LOS with the Revised Proposal (i.e., future 'Baseline' traffic volumes and LOS results are consistent with the Final SEIS during the Sunday PM peak hour). Additionally, the same eight intersections that would operate at non-compliant LOS during the summer Sunday PM peak hour with SEIS Alternative 6 would operate at non-complaint LOS with the Revised Proposal.

As identified previously for the summer weekday PM peak hour, although overall intersection delay may increase at some locations with the Revised Proposal, there would be no new intersections that would operate at non-compliant LOS during the summer Sunday PM peak hour compared to SEIS Alternative 6. Therefore, the overall impacts of the Revised Proposal identified in this Addendum are consistent with the analysis of impacts in the SEIS.

Roadway LOS

Roadway capacity was also evaluated on roadways within the 47° North project vicinity. The roadway capacity evaluation is consistent with the City of Cle Elum LOS policy for roadways and assumptions identified in the *City of Cle Elum 2019-2037 Comprehensive Plan* (Capital Facilities element, Table 404). Roadway LOS analysis results with the Revised Proposal for future years 2031 and 2037 during the weekday PM peak hour in the peak summer period are summarized in **Table 3.6-3**. See Tables G.2 and G.9 in Appendix G of **Appendix C** for the 2031 and 2037 Friday and Sunday summer PM peak hour roadway capacity results.

TABLE 3.6-3
ROADWAY WEEKDAY PEAK HOUR VOLUME AND LEVEL OF SERVICE

						Year 2031 Weekday												Year 2037 Weekday											
						‘Baseline’			With Alt 6			‘Baseline’ ³			With Revised Proposal			‘Baseline’ ³			With Alt 6			‘Baseline’ ³			With Revised Proposal		
Functional Class	Road Name	Direction of (E/O, W/O, S/O, N/O)	Nearest Crossroad	Number of Lanes	Idealized Roadway Capacity (vph) ¹	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²	PM Peak Hour Vol (vph)	% of Peak Volume vs Roadway Capacity	Level of Service (LOS) ²
Freeways	I-90 Eastbound Off-ramp (Exit 84)	to	W 1 st Street	1	1,200	530	44%	A	542	45%	A	--	--	--	545	45%	A	590	49%	A	604	50%	A	--	--	--	605	50%	A
	I-90 Westbound On-ramp (Exit 84)	from	W 1 st Street	1	1,200	320	27%	A	328	27%	A	--	--	--	331	28%	A	360	30%	A	371	31%	A	--	--	--	371	31%	A
	I-90 Westbound Off-ramp (Exit 84A)	to	N Oakes Ave	1	1,200	340	28%	A	390	33%	A	--	--	--	392	33%	A	400	33%	A	448	37%	A	--	--	--	452	38%	A
	I-90 Eastbound On-ramp (Exit 84A)	from	N Oakes Ave	1	1,200	240	20%	A	267	22%	A	--	--	--	280	23%	A	280	23%	A	318	27%	A	--	--	--	320	27%	A
	I-90 Eastbound On-ramp (Exit 80)	from	Bullfrog Road	1	1,200	245	20%	A	269	22%	A	270	23%	A	303	25%	A	335	28%	A	367	31%	A	360	30%	A	393	33%	A
	I-90 Westbound Off-ramp (Exit 80)	to	Bullfrog Road	1	1,200	355	30%	A	405	34%	A	400	33%	A	459	38%	A	555	46%	A	610	51%	A	600	50%	A	659	55%	A
Major Collector	SR 903 (W 1 st St) (Eastbound Only)	W/O	N Pennsylvania Ave	1	1,000	430	43%	A	483	48%	A	--	--	--	466	47%	A	460	46%	A	495	50%	A	--	--	--	496	50%	A
	SR 903 (W 2 nd St)	W/O	N Oakes Ave	2	2,000	1,040	52%	A	1,301	65%	B	--	--	--	1,246	62%	B	1,320	66%	B	1,514	76%	C	--	--	--	1,526	76%	C
	SR 903	W/O	N Stafford Ave/ S Cle Elum Way	2	2,000	1,130	57%	A	1,537	77%	C	--	--	--	1,478	74%	C	1,310	66%	B	1,638	82%	D	--	--	--	1,658	83%	D
	W 1 st St	E/O	N Pine St	2	2,000	1,000	50%	A	1,000	50%	A	--	--	--	1,059	53%	A	1,130	57%	A	1,185	59%	A	--	--	--	1,189	59%	A
	N Pennsylvania Ave	N/O	SR 903	2	2,000	240	12%	A	290	15%	A	--	--	--	293	15%	A	300	15%	A	350	18%	A	--	--	--	353	18%	A
	N Oakes Ave	N/O	Railroad Ave	2	2,000	670	34%	A	747	37%	A	--	--	--	764	38%	A	810	41%	A	898	45%	A	--	--	--	904	45%	A
	Bullfrog Road	S/O	SR 903	2	2,000	480	24%	A	625	31%	A	710	36%	A	904	45%	A	500	25%	A	686	34%	A	730	37%	A	924	46%	A

Source: TENW, 2023.

1. The City of Cle Elum’s major collector idealized capacities are 1,000 vph/ln, with 400 vph for two-way left-turn (TWLT) lanes.

2. LOS = Level of Service. Bold indicates does not meet LOS standard. (LOS A = 0.60 V/C, LOS B = 0.61 to 0.70 V/C, LOS C = 0.71 to 0.80 V/C, LOS D = 0.81 to 0.90 V/C, LOS E = 0.91 to 1.0 V/C, LOS F = >1.0 V/C).

3. DASHES indicate baseline volumes are consistent with the FSEIS and did not change with this update.

In general, the LOS results shown in **Table 3.6-3** are consistent with impacts shown in the 47° North FSEIS in that there would be traffic congestion throughout the city, primarily along W 2nd Street (SR 903); congestion is anticipated to be highest on summer weekends and would be expected to continue to deteriorate over time if no improvements are made.

The results in **Table 3.6-3** show that the evaluated roadway sections are anticipated to operate at compliant levels of service (LOS C or better) during the summer weekday PM peak hour with SEIS Alternative 6 and the Revised Proposal by 2031. However, W 2nd Street (SR 903) west of N Stafford Ave is anticipated to operate at LOS D by 2037 during the summer weekday PM peak hour with either SEIS Alternative 6 or the Revised Proposal.

Site Access Intersection LOS

The LOS analyses results at the site access intersections for future years 2025, 2031, and 2037 with the Revised Proposal are summarized in **Table 3.6-4** for the weekday PM peak hour, Friday PM peak hour, and Sunday PM peak hour (all for the summer peak period).

Site access locations forecast to operate at non-compliant LOS (LOS D, E, or F for the SR 903/Main Access Road site access and LOS E or F for the proposed Bullfrog Road site accesses) are shown in bold text in **Table 3.6-4**. Site access locations forecast to operate at non-compliant LOS with the Revised Proposal that were not identified to operate at a non-compliant LOS with SEIS Alternative 6 are shown as bold, purple text and purple highlight in **Table 3.6-4**. The LOS results are discussed below.

Weekday Summer PM Peak Hour

As shown in **Table 3.6-4**, during the weekday summer PM peak hour with the Revised Proposal, the following site access intersections are anticipated to operate at non-compliant LOS:

- #28 - Bullfrog Road / RV Access Road – LOS E by 2031 (*identified as compliant LOS D with SEIS Alternative 6*)
- #30 - SR 903 / Main Access Road – LOS F by 2025

Friday Summer PM Peak Hour

As shown in **Table 3.6-4**, during the Friday summer PM peak hour with the Revised Proposal, the following site access intersections are anticipated to operate at non-compliant LOS:

- #28 - Bullfrog Road / RV Access Road – LOS F by 2031
- #30 - SR 903 / Main Access Road – LOS F by 2025

Table 3.6-4
SITE ACCESS LOS SUMMARY – REVISED PROPOSAL & SEIS ALTERNATIVE 6

		Future Conditions (Summer Peak)											
		2025				2031				2037			
		With SEIS Alt 6		With Revised Proposal		With SEIS Alt 6		With SEIS Alt 6 Revised		With SEIS Alt 6		With Revised Proposal	
Site Access Intersection ¹	LOS Standard	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹	LOS ¹	Delay ¹
WEEKDAY PM PEAK HOUR CONDITIONS													
28. Bullfrog Road / RV Access Road	D	C	16.6	C	18.6	C	24.0	E	40.1	D	28.6	F	65.1
29. Bullfrog Road / Main Access Road	D	B	13.5	C	18.5	C	16.2	D	33.8	C	23.2	D	33.0
30. SR 903 / Main Access Road	C	F	55.9	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100
FRIDAY PM PEAK HOUR CONDITIONS													
28. Bullfrog Road / RV Access Road	D	D	25.2	C	22.0	F	53.7	F	64.2	F	65.1	F	> 100
29. Bullfrog Road / Main Access Road	D	C	16.2	C	17.2	C	24.8	D	32.5	D	34.7	D	31.6
30. SR 903 / Main Access Road	C	F	82.6	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100
SUNDAY PM PEAK HOUR CONDITIONS													
28. Bullfrog Road / RV Access Road	D	E	48.9	E	35.2	F	> 100	F	> 100	F	> 100	F	> 100
29. Bullfrog Road / Main Access Road	D	D	29.4	E	35.5	F	> 100	F	> 100	F	> 100	F	> 100
30. SR 903 / Main Access Road	C	F	89.7	F	> 100	F	> 100	F	> 100	F	> 100	F	> 100

Source: TENW, 2023.

¹LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. LOS analysis at site access intersections assumes two-way stop control with major roadway (Bullfrog Road and SR 903) being free flow. Bold indicates does not meet LOS standard. Bold, purple text with purple highlight indicates changes in non-compliant LOS intersections compared to the *Final SEIS*.

Sunday Summer PM Peak Hour

As shown in **Table 3.6-4**, during the Sunday summer PM peak hour with the Revised Proposal, the following site access intersections are anticipated to operate at non-compliant LOS:

- #28 - Bullfrog Road / RV Access Road – LOS E by 2025
- #29 - Bullfrog Road / Main Access Road – LOS E by 2025 (*identified as LOS F by 2031 with SEIS Alternative 6*)
- #30 - SR 903 / Main Access Road – LOS F by 2025

3.6.3 Mitigation Measures

Overall, the significant adverse impacts on transportation that would occur from the Revised Proposal are consistent with those identified in the *Final SEIS*. Additionally, no new off-site mitigation measures are required for the Revised Proposal. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

Table 3.6-5 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 3.6-5** 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 3.6-5** 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 3.6-5
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 3.6-5**, 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 3.6-5** 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 3.6-5**, 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 3.6-5** 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 3.6-5** that are forecast to operate at non-compliant LOS in future years 2025, 2031, or 2037 without or with full buildout of 47th North during the weekday summer PM peak hour.

The key differences between **Table 3.6-5** 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 3.6-6**.

As shown in **Table 3.6-6**, 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 3.6-6
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 3.6-6**, 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.

Other Mitigation Measures

Other mitigation measures related to traffic monitoring, construction management program, and trail system and sidewalks still apply with the Revised Proposal and are consistent with mitigation measures in the *Final SEIS*. A complete list of mitigation measures is included in **Appendix F**.

Section 3.7

PUBLIC SERVICES

3.7.1 Affected Environment

2020 / 2021 SEIS

The SEIS described the existing public services conditions (i.e., police, fire protection, hospital and emergency medical, emergency dispatch, and school services) in the vicinity of the 47° North site at that time (see Draft SEIS Section 3.12 for details). Selected information from the Draft SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

Revised Proposal

Police Service

In the last two City of Cle Elum budget cycles, the Police Department proposed staffing increases – calculated using the International City/County Management Association (ICMA) method – to address understaffing, and the city has authorized their requests. In the 2023 budget, the city funded two new officers per shift, which contributes to an addition of four new officers since 2020 and a current total of 12 officers (*Cle Elum-Roslyn-South Cle Elum Police Department, 2022*).¹

Fire Protection Service

No new information was provided by the Fire Department for this Addendum. Therefore, the existing conditions information from the SEIS is used for this analysis.

Hospital & Emergency Medical Service

Kittitas County is served by two hospital districts. Hospital District No. 1 operates a full-service critical access hospital in Ellensburg. Hospital District No. 2 operates Medic One ambulance service and maintains a medical clinic in Cle Elum.

Kittitas Valley Hospital District No. 1

Hospital District No. 1 provided updated information on staffing levels and other projected needs for their services in the future, and this information indicates that staffing levels for Hospital District No. 1 have decreased since 2019. This reduction has not been intentional but is due to several extraneous factors, including retirements, and could be transitory. To provide a more conservative estimate of impacts, the analysis in this Addendum continues to use the prior, higher staffing levels identified in the SEIS to estimate population-based demand for the Revised Proposal.

¹ Later in 2023, the City of South Cle Elum will begin contracting for police service with Kittitas County and the city department will be renamed the Cle Elum-Roslyn Police Department. This change will incrementally reduce the population served by the department and will in effect increase the existing level of service as measured by population.

Hospital District No. 1 does not have an adopted level of service but provided information regarding various population estimates and ratios of staff-to-population that could be used to identify service demand. (*Hospital District No. 1/Kittitas Valley Healthcare, 2022*). The 2020 census data generally shows that Kittitas County has significantly higher population-to-provider ratios than the state as a whole (i.e., it provides a lower effective level of service and has an existing service deficiency). The provided data also notes that Washington State has the fewest primary care providers per 100,000 residents of any state in the nation, which also suggests a present deficiency relative to other states. Hospital District No. 1 calculated the staff, using the current Washington State ratios, needed to meet the demands of the current County population (less than 50,000) and a future County population of 70,000. **Table 3.7-4**, later in this section, presents the alternative staffing needs based on the 50,000 population. A portion of the demand embodied in this calculation reflects an existing deficiency, however, which cannot be attributed to a proposed project according to long-standing SEPA policy.

Projected staffing needs based on a future 70,000 population have not been calculated, however, for several reasons. First, the Washington State Office of Financial Management (OFM) projects population only as far as 2050; based on OFM's forecast growth rates, Kittitas County would not reach a population of 70,000 until approximately 2070. Calculating health care demands beyond 2050 would be extremely speculative. In addition, the Revised Proposal would be built out in 2031, and any additional growth and service impacts beyond that date would not be attributable to 47° North; its pro rata share of need would also decrease as the population base increased. In addition, extending the time horizon and using it to establish a hypothetical level of service would serve to carry forward and exacerbate the Hospital District's existing staffing deficiency. As noted previously, Hospital District 1 has not adopted a level of service standard and using an unadopted standard based on a projection of future population would merely identify a hypothetical need that is not attributable to the proposal.

Hospital District No. 1 also documented current costs and revenues to the District overall, noting that its costs are rising and revenues do not cover all costs. This situation is unfortunately common for many special purpose districts in Washington State, due to limited taxing authority, levy lids, etc. As noted in the Fiscal Conditions analysis discussion in the SEIS and this Addendum, however, hospital districts also rely primarily on charges for service, including insurance reimbursements, to generate the majority of their revenue. Based on 2021 data submitted by the District to the State Department of Health, Hospital District 1 receives more than 96% of its revenues from patient charges and a very minor amount from tax revenues. The District has the flexibility to increase service charges to address rising costs.

Kittitas Valley Hospital District No. 2

Hospital District No. 2, which serves the Suncadia Master Planned Resort and unincorporated area surrounding Cle Elum as well as the City, supplied updated information on calls for emergency medical service from 2016 to 2022. This data shows that call volumes to Hospital District No. 2 have remained relatively constant over the past seven years with an average of 1,410 calls per year. A breakdown of the distribution of calls for the most recent year (2022) indicates that approximately 30% of the calls to Hospital District No. 2 were for emergency medical service within the City of Cle Elum and the remaining 70% of the calls were for service from locations outside of the City, i.e., unincorporated Kittitas County and other cities. See **Appendix D** for details on calls to Hospital District No. 2. Therefore, most of the calls to Hospital District No. 2 are from outside the City of Cle Elum. The distribution of calls received from permanent residents versus those from recreational visitors is unknown. However, calls associated with recreational visitors are included within the service call total, whether within or outside the City. In addition, approximately one-half of the housing within the zip code that corresponds to the Hospital District 2 service area/taxing boundary are occupied seasonally (<https://www.unitedstateszipcodes.org/98922/#stats>).

Emergency Dispatch

Updated staffing information was provided by KITTCOM for this analysis. KITTCOM is currently authorized for 15 full-time emergency dispatchers (*KITTCOM, 2022*).

Schools

The Cle Elum-Roslyn School District provided updated enrollment history and enrollment projection information, including student generation rates for single family and multi-family residences. Student enrollment in October 2022 was approximately 935 students. **Table 3.7-1** summarizes enrollment projections for the School District through 2032. These projections include assumptions for the 47° North project (including the addition of affordable housing units) as well as other known development that is anticipated to occur within the School District (e.g., the Suncadia Master Planned Resort and the City Heights project).

**Table 3.7-1
CLE ELUM-ROSLYN SCHOOL DISTRICT
STUDENT ENROLLMENT PROJECTIONS**

Grade	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2032
K-5	423	446	475	516	553	570	575	581	589	594	596
6-8	237	221	209	206	228	257	301	328	341	342	349
9-12	275	300	322	323	317	310	304	320	354	397	439
Total Students	935	967	1,006	1,045	1,098	1,137	1,180	1,229	1,284	1,333	1,384

Source: Cle Elum-Roslyn School District and Educational Data Solutions, 2022.

Based on existing School District facility capacity information that was identified in the SEIS (i.e., capacity for approximately 970 students), it is anticipated that the projected enrollment identified in **Table 3.7-1** would exceed the district's existing facility capacity by 2024. As part of the district's planning and projections, they anticipate the need to develop an Early Childhood Learning Center (ELC) in the future. The ELC could include between 8 and 10 classrooms and auxiliary spaces like offices, conference rooms, and space for support programs (e.g., for physical therapy, occupational therapy, and speech). The current plan is to include preschool, transitional kindergarten, Early Childhood and Assistance Program (E-Cap), and Kindergarten. The district is in the early stages of planning for this facility.

Current student generation rates identified by the School District are 0.4 students per single family residence and 0.1 students per multi-family residence (*Cle Elum-Roslyn School District, 2022*), which is slightly higher than the average student generation rate used in the SEIS (0.25 per household) and reflects a greater number of students from the Suncadia Master Planned Resort and other development than originally projected.

3.7.2 Impacts

2020 / 2021 SEIS

The SEIS evaluated additional demand for public services (police service, fire protection, hospital and emergency medical, emergency dispatch, and public schools) associated with construction and operation of SEIS Alternatives 5 and 6. The SEIS analyzed operational impacts based on population, as it is commonly assumed that population would be the primary generator of service demand. For purposes of analysis, it was generally assumed that staffing needs would increase in direct proportion with population increases using current ratios of staff-to-population. Use of de facto population-based LOS standards are commonly applied in environmental documents to estimate service demands in jurisdictions that have not adopted a formal LOS standard. An alternate method of assessing impacts on police service (the ICMA method) prepared by the Cle Elum-Roslyn-South Cle Elum Police Department was also presented in the SEIS.

Overall, using population-based standards and including a proxy population for RV resort sites, the SEIS concluded that Alternative 6 would generate less demand for services compared to Alternative 5 (see **Table 3.7-2**, footnote 4 for an explanation of the RV population used for the analysis). However, as discussed further below, the use of a proxy population to estimate transient demand from RV visitors may be overly conservative and may overstate probable demand. As noted previously, the Cle Elum area is a popular recreational destination and demand associated with transient recreational visitors is already reflected in historic local demand for various services. Attributing a separate proxy population to RV sites may, therefore, reflect double counting and be overly conservative. Alternative de facto levels of service using local data (e.g., number of calls experienced

historically rather than an assumed population) are also discussed in the analysis where more specific information is available.

Revised Proposal

As in the SEIS, the analysis of public service impacts of the Revised Proposal is generally based on population, and it is assumed that project-related population would be the primary generator of additional service demand. As mentioned above, this method is a generally accepted approach to estimating service impacts in the absence of adopted quantitative levels of service standards, as is the case for all service providers considered here. An alternative method for calculating police service demand recommended by the Cle Elum Police Department, is also considered in the SEIS and this Addendum. Additional data that bears on demand and alternative estimates are also discussed where local historical data is available.

It is noted that assuming a continuing linear increase in demand and staffing in proportion to population increases may not be an accurate predictor of future needs. For example, this methodology does not account for economies of scale that are present in many organizations and allows them to accommodate some amount of increased demand without increasing staff. While it is appropriate to take a conservative approach to estimating demand for purposes of analysis, it is also appropriate to consider other data that bears on demand, along with methods that can be applied to measure project performance and actual post-development demand.

Table 3.7-2 provides a breakdown of the proposed residential units and associated permanent population under SEIS Alternative 6 and the Revised Proposal; SEIS Alternative 5 is also noted for comparison purposes. An equivalent or proxy population is calculated for the RV sites and included in the total population used to calculate potential public service demands that would be generated by the RV component of SEIS Alternative 6 and the Revised Proposal. The calculation of service demand uses a staff-to-population ratio that accounts for potential calls from non-residents (including university students), recreational visitors and part-time residents. These population groups currently and historically comprise a sizable portion of the total area-wide population and create some proportion of demand for various services; this proportion is not separately tracked or estimated by service providers, however. To the extent such service demand is already accounted for in the staff-to-population ratios used by the various service purveyors to determine staffing needs (i.e., it is already implicitly included in the number of calls for service that inform a service provider's level of service and its existing ratio or staff-to-population), the proxy population likely results in some amount of double counting and resulting calculations may be overly conservative. Equating transient RV visitors to some proportion of permanent residential population may overstate future demand. For example, as shown in **Table 3.7-2**, the RV proxy population metric used to estimate demand for the Revised Proposal and SEIS

Alternative 6 adds approximately 39% to the total population that is used to estimate service demand and a proportional increase in the staff required to meet the demand. Eliminating or modifying the RV proxy population metric would reduce the estimates of service needs by some factor.

**Table 3.7-2
RESIDENTIAL POPULATION –
SEIS ALTERNATIVES 5 and 6, & REVISED PROPOSAL (2031)**

Alternative	Permanent Residential Units	Residents / Household	Occupancy Rate	New Residents	RV Sites	RV Proxy Population	Total Resident/ RV Population
SEIS Alternative 5	1,334	2.34 ¹	90% ¹	2,809	0	0	2,809
SEIS Alternative 6	707	2.34 ¹	90% ¹	1,489	627	941 ⁴	2,430
Revised Proposal	757 ³	2.37 ²	88% ²	1,579 ³	627	941 ⁴	2,520
Revised Proposal w/o Affordable Housing	707 ³	2.37 ²	88% ²	1,475 ³	627	941 ⁴	2,416

Source: 2020/2021 SEIS, Sun Communities, 2022.

¹ Household sizes and occupancy rates for SEIS Alternatives 5 and 6 are based on the *U.S. Census Bureau, 2014-2018, American Community Survey, 5-Year Estimates*.

² Household sizes and occupancy rates for the Revised Proposal are based on the *U.S. Census Bureau, 2016-2020, American Community Survey, 5-Year Estimates*.

³ The permanent residential units and associated residents are those at buildout of the entire Revised Proposal in 2031.

⁴ The proxy population calculated for the RV sites is based on 627 sites, an assumed average RV resort occupancy of 50%, and three people per site, based on data provided by the Applicant reflecting occupancy at other projects throughout the U.S.

Table 3.7-3 compares the public service demands from operation of SEIS Alternatives 5 and 6 with those from the Revised Proposal. Details about the public services demands from the Revised Proposal are described below. The specific impacts of the Revised Proposal and SEIS Alternative 6 are substantially similar using de facto population-based level of service ratios. Alternative 5 would generate greater demand for public services overall due to its larger population.

Police Service

New residents and RV site visitor population during operation of the Revised Proposal would generate increased demand for police service, including new calls for service from the site. New calls and increased demand for police service would create an increased need for additional officers to serve new residents. Based on the updated, higher Police Department staffing levels and using a population-based standard (12 officers per 3,775 population), the Revised Proposal at buildout would generate a greater need for additional officers than SEIS Alternative 6 but less than SEIS Alternative 5 in 2031 (see **Table 3.7-3**). The small increase in demand for SEIS Alternative 6 is primarily attributable to the City's recently increased staffing level. The additional affordable housing units in the Revised Proposal comprise approximately 4% of the increase and in itself this is not considered a significant difference from SEIS Alternative 6 or a significant impact.

**Table 3.7-3
PUBLIC SERVICE DEMANDS –
SEIS ALTERNATIVE 5, 6, & REVISED PROPOSAL (2031)**

Service Provider	SEIS Alternative 5 ¹	SEIS Alternative 6 ¹	Revised Proposal ¹	Revised Proposal w/o Affordable Hsg. ¹
Police Service ²	8.9 officers	7.7 officers	8.0 officers	7.7 officers
Fire Service	1.8 firefighters	1.6 firefighters	1.6 firefighters	1.6 firefighters
Hospital Dist. #2 Medic One ³	5.4 EMTs, 6.6 paramedics	4.7 EMTs, 5.7 paramedics	4.9 EMTs, 5.9 paramedics	4.7 EMTs, 5.7 paramedic
Cle Elum Medical Clinics ³	0.6 physicians, 4.8 APCs, and 3.6 RNs	0.5 physicians, 4.2 APCs, and 3.1 RNs	0.5 physicians, 4.3 APCs, and 3.2 RNs	0.5 physicians, 4.1 APCs, and 3.1 RNs
Hospital Dist. #1 Ellensburg Hospital ³	1.0 physicians, 0.2 APCs, and 6.0 RNs	0.9 physicians, 0.2 APCs, and 5.2 RNs	0.9 physicians, 0.2 APCs, and 5.3 RNs	0.9 physicians, 0.2 APCs, and 5.2 RNs
Emergency Dispatch/KITTCOM	0.9 dispatchers	0.8 dispatchers	0.8 dispatchers	0.8 dispatchers
Public Schools	376 students 25.4 teachers 6.3 to 8.4 new buses	229 students 15.5 teachers 3.8 to 5.1 new buses	234 students 15.8 teachers 3.9 to 5.2 new buses	229 students 15.5 teachers 3.8 to 5.1 new buses

Sources: *Cle Elum–Roslyn–South Cle Elum Police Dept., Cle Elum Fire Dept., Kittitas Hospital Districts #1 & #2, KITTCOM, Cle Elum – Roslyn School Dist., 2020 and 2022.*

¹ Calculations based on 2022 population data for service provider jurisdictions.

² Based on data from Cle Elum Police Department indicating a current staffing level of 12 officers per 3,775 population.

³ Based on 2020 staffing levels identified by Hospital District No. 1 and No. 2.

EMT = Emergency Medical Technician

APC = Advanced Practice Clinician

RN = Registered Nurse

As noted previously, the Police Department also provided an update of their alternative ICMA methodology analysis, which is not based solely on population. Using this method, the Police Department estimates that the Revised Proposal would generate the need for a total of eight additional officers at full buildout with or without the additional affordable housing units of the Revised Proposal (*Cle Elum-Roslyn-South Cle Elum Police Department, 2022*). It is unknown whether the ICMA method would result in a different estimate of need once South Cle Elum is withdrawn from the department's service area.

New officers would require additional vehicles and other equipment. The growth and service demand represented by 47^o North may also contribute to an eventual need to expand the existing police station. The Police Department is in the very early stages of planning for a new or expanded police station, including the possibility of a joint facility with the Kittitas County Sheriff's Department. Given the preliminary nature of such plans, however, the extent of any impact and proportional responsibility of 47^o North cannot be determined at this time.

Fire Protection Service

During operation, new residents and RV site visitors would generate additional demand for fire protection services. Based on the Fire Department's identified future need for full-time firefighters and an average of the full-time firefighters in comparably sized cities (4 firefighters per 6,115 people), it is anticipated that new development and associated population under the Revised Proposal at buildout would generate the same need for additional full-time firefighters as SEIS Alternative 6 but less than SEIS Alternative 5 in 2031. The 50 affordable housing units would not materially change the need for firefighters for the Revised Proposal (see **Table 3.7-3**).

Additional equipment would also likely be required, including replacement of the primary fire engine and primary ambulance.

Emergency Access. Like SEIS Alternative 6, the proposed access points and on-site access roads under the Revised Proposal would provide adequate emergency access based on the International Fire Code (IFC); no additional emergency access is required for the Revised Proposal subject to confirmation by the Fire Department. However, to enhance public safety for other neighborhoods in the Cle Elum area, the Revised Proposal includes an emergency access road in the RV resort that extends to the southern site boundary (see **Figures 2-4**, Master Site Plan – Revised Proposal). The City and the Horse Park could extend this road offsite through the Horse Park and connect to Douglas Munro Boulevard. With this off-site extension, emergency access could be provided from Bullfrog Road and SR 903 to Douglas Munro Boulevard for other neighborhoods in the Cle Elum area.

Under SEIS Alternative 6, an emergency access road could also be provided by the City from the affordable housing site access road. Under the Revised Proposal, the affordable housing site would not be developed on a separate site (affordable housing would be located in the multi-family area onsite), and an emergency access road would not be provided from this portion of the site.

Hospital & Emergency Medical Service

The following analysis is based on the application of several different levels of service (LOS) to estimate demand with the Revised Proposal. The affected service providers, Kittitas Valley Hospital Districts No. 1 and 2, have not adopted quantitative LOS standards and the impact analysis in the SEIS and this Addendum are, therefore, based on several de facto ratios of staff-to-population. Use of de facto standards is a standard approach used in environmental documents in situations where quantitative LOS standards have not been adopted by the jurisdiction or service provider. The ratio used in the SEIS to identify impacts was based on the current number of staff in affected local and regional healthcare facilities using different service area populations (Upper County or county-wide, respectively). Those same ratios are used again in this document to help facilitate comparisons between the SEIS

Alternatives and the Revised Proposal. As noted previously, the proxy population assumed for the RV sites and transient visitors may overstate demand by some degree.

Hospital District No. 1 and 2 also provided two additional staffing ratios based on existing and future county-wide and state-wide population in response to a request for updated information. The results of applying the ratios are also included in the analysis. It is noted, however, that the broad staffing categories used by the Hospital Districts in the information provided for this document differ from and are not directly comparable to those provided and used in the SEIS. In addition, it is important to identify and segregate any existing deficiencies that may be reflected in current staffing levels so that they are recognized as such and are not inappropriately attributed to the Revised Proposal. Relatedly, the Hospital Districts have acknowledged that they are currently affected by staffing shortages due to retirements, job changes, and workers leaving the area. The staff reductions could be considered to reflect a decrease in the level of service or as existing deficiencies. However, the analysis takes a more conservative approach that treats this reduction as temporary and uses the former (SEIS) staffing level to avoid underestimating future project-related demand.

Kittitas Valley Hospital District No. 1. Hospital District No. 1 is expected to experience increased demand for hospital services from new residents under the Revised Proposal. Based on 2020 staffing levels at the hospital in Ellensburg (17 physicians, four APCs, and 101 RNs per 46,570 people), it is anticipated that the Revised Proposal at buildout would generate the same need for additional staff as SEIS Alternative 6 but less than Alternative 5 in 2031. The additional affordable housing units included in the Revised Proposal would comprise approximately 2% of the additional demand for RNs; the demand for physicians and APCs would be relatively equal with or without the additional housing units (see **Table 3.7-3**). Potential demand associated with transient recreational visitors is addressed on page 3.7-6 above and in the separate discussion on page 3.7-12 below. The district anticipates that increased demand (as well as other growth in the County) would result in the need to provide additional building space at one of the existing facilities.

The following discussion is based on the updated information provided by Hospital District No. 1 on their current and projected staffing needs using ratios of staff to existing and forecast countywide and statewide population. These ratios are not adopted levels of service and it is not clear if the district uses them for its own planning, hiring or other purposes. Results are shown in **Table 3.7-4** and vary considerably depending on which ratio is applied. Either ratio, however, indicates an existing deficiency in current district staff levels before considering the impacts of the Revised Proposal. Applying staffing ratios that are based on the 2020 census population of the State of Washington as a whole and state-wide healthcare staffing levels provided by the Hospital Districts, the current Kittitas County population of approximately 50,000 people would require a total of approximately 13 primary care providers, 183 mental health providers, 42 dental providers, and 136 specialty care providers. As noted earlier in this section of the Addendum, staffing needs with a

future County population of 70,000 are not documented for reasons identified in the discussion.

**Table 3.7-4
HOSPITAL DISTRICT NO. 1 STAFF NEEDS –
ALTERNATIVE POPULATION-BASED RATIO
(50,000 COUNTY POPULATION^A) – REVISED PROPOSAL**

Provider Type	Existing Staff ¹	Current Staff Needs based on 50,000 Population ^{1, 3}	Existing Deficiency	Staff Needs of Revised Proposal ^{3, 4}
Primary Care	29 providers	42 providers	13 providers	2.1 providers
Mental Health	82 providers	185 providers	103 providers	9.3 providers
Dental Health	22 providers	42 providers	20 providers	2.1 providers
Specialty Care	N/A ⁵	136 providers	N/A ^{5, B}	6.9 providers

Source: Hospital District No. 1, 2022; EA Engineering, 2022.

¹ Assumes a current County population of 50,000 as provided by Hospital Districts. Note that existing county population (2020 census as adjusted by OFM) is 46,468.

² Kittitas County hospital staff-to-population ratios provided by Kittitas Hospital Districts on Oct. 10, 2022. Existing staff was derived based on this ratio.

³ Washington state hospital staff-to-population ratios provided by Kittitas Hospital Districts on Oct. 10, 2022.

⁴ Based on permanent population from the residential uses and proxy population from the RV resort under the Revised Proposal (see the Housing, Population, and Employment analysis for the calculation of this population). Result reflects project population and need as a proportion of countywide population and need exclusive of existing deficiency. As noted previously, the RV proxy population may overstate demand.

⁵ No existing Kittitas County ratio of hospital staff to population was provided for this category of staff.

Notes:

A. The alternative County staff-to-population ratios provided by the Hospital Districts and used to calculate existing staff are as follows:

- Primary Care – 1 provider / 1,710 population
- Mental Health – 1 provider / 610 population
- Dental – 1 provider / 2,280 population
- Specialty Care – no ratio available.

The alternative Washington State staff-to-population ratios provided by the Hospital Districts and used to calculate current and future staff need based on countywide population, as well as the staff needs of the Revised Proposal, are as follows:

- Primary Care – 1 provider / 1,180 population
- Mental Health – 1 provider / 270 population
- Dental – 1 provider / 1,200 population
- Specialty Care – no ratio available.

B. Note that the existing deficiency has not been calculated for the future/2037 population scenario. The Revised Project's elements would be built out in 2028 (residential/RV) and 2031 (commercial) and would not be generating additional population or staff needs in 2037.

Proportional hospital staffing demand from the Revised Proposal was analyzed based on the alternative staffing ratios provided by Hospital District No. 1. The results – showing existing staffing deficiencies and projected staffing needs of the Hospital District based on current Kittitas County population – are shown in **Table 3.7-4**. As indicated in the table, when the alternative ratios are applied, approximately one-third of the Hospital District's projected needs reflect existing staffing deficiencies. (Note that complete data is not available for all provider categories, so results are approximate.) The Revised Proposal would generate a

need for approximately 20.4 staff across the provider categories, including a substantial number of staff that would be needed to correct existing deficiencies based on these hypothetical ratios, compared to approximately 15.6 based on the staff-to-population ratio used in the SEIS.

Kittitas Valley Hospital District No. 2. During operation, new residents and RV site visitor population would generate increased demand for emergency medical services (ambulance transports, etc.) and hospital services. Based on 2020 staffing levels for Hospital District No. 2 Medic One (9 EMTs and 11 paramedics per 4,200 people), it is estimated that new development and associated population under the Revised Proposal at buildout, including the proxy population calculated for the RV component, would generate incrementally greater need for more additional staff than SEIS Alternatives 6 and less than SEIS Alternative 5 in 2031 based on the District's 2022 service area population. The demand attributable to the additional population/affordable housing units included in the Revised Proposal compared to SEIS Alternative 6 would comprise approximately 4% of the increased demand (see **Table 3.7-3**). The incremental differences are not considered significant and impacts with either alternative would be less than for SEIS Alternative 5. As discussed previously, the assumed RV proxy population and resulting impacts identified for the Revised Proposal and Alternative 6 likely double count and overestimate demand.

Note that SEIS Alternative 6 did not study the impacts of the 50 affordable housing units that would ultimately be developed by others on the land dedicated to the City for that purpose. Those impacts would be the same as the incremental impact associated with the Revised Proposal.

The existing clinics in Cle Elum would also see increased demand. 2020 staffing levels at the facilities in Cle Elum consist of one physician, eight APCs, and six RNs per 4,200 population. It is estimated that the Revised Proposal, including the RV proxy population, would generate the need for incrementally more staff than SEIS Alternatives 6 but less than SEIS Alternative 5. The 50 additional affordable housing units would comprise approximately 4% of the additional demand for APCs and RNs; the demand for physicians would be relatively equal with or without affordable housing units. The incremental differences are not considered significant. As noted previously, the RV proxy population used in this analysis is considered conservative and likely overstates impacts.

The potential number of emergency services calls that could be generated by the Revised Proposal can also be estimated using recent service call data provided by Hospital District 2. Of the total calls received by Hospital District No. 2 in 2022 (1,420 total calls), approximately 425 calls were for service in the City of Cle Elum. With approximately 1,175 housing units in the City of Cle Elum in 2022, the existing housing units generated approximately 0.36 emergency service calls per housing unit in 2022. Using that same ratio of calls per housing unit, the new residential units under the Revised Proposal would generate approximately 274 emergency service calls per year. Calls could vary further if occupancy and or vacancy rates are lower than assumed for the analysis (refer to SEIS Section 3.9).

Demand for Hospital District Service from the RV Resort. As mentioned previously, the demand for Kittitas Valley Hospital Districts' services from the RV resort component of the Revised Proposal and SEIS Alternative 6 was estimated by calculating and incorporating a proxy population from the resort in addition to the permanent population. These calculations are based on two different methodologies discussed above.

The Kittitas Valley Hospital Districts have also questioned whether transient visitors to the 47° North RV resort would generate greater demand for the Hospital Districts' services than the general population. The Hospital District did not provide any data to support this hypothesis, however. As noted in the previous paragraph, the proxy population estimate identified in the SEIS and this Addendum are intended to account for the demand from the RV resort. The SEPA consultant conducted additional research and analysis which did not identify any local or national data that directly supports the hypothesis that RV visitors would generate disproportional demand for medical or emergency services. Most of the data, in fact, suggests the converse, i.e., that transient recreational-visitor related demand would be less than that associated with permanent residential population. Relevant data is described below.

It is noted in passing that the MountainStar Draft EIS (Kittitas County, 1999) did not evaluate impacts to Hospital District No. 1 and the conditions of approval did not require any specific mitigation for the Master Planned Resort, which was proposing more than 4,000 recreational-residential units and extensive recreational facilities, other than monitoring of demand and reporting to Kittitas County every 2-5 years. The EIS analysis for Hospital District No. 2 similarly did not quantify anticipated demand but did require acquisition of an ambulance for the district and periodic monitoring/reporting of calls.

As background, the 47° North RV resort includes RV and glamping sites and related recreational facilities (see **Chapter 2** for details). The main activities at the RV resort would be leisure and recreational in nature and would include the use of on-site parks, trails, and amenity centers. Visitors would stay at the resort for an average of three to four days. RV visitors could also participate in off-site recreational activities.

One study identified the most common injury activities associated with sports and recreation activity as hiking, winter sports, and mountaineering (*Stephens, Dickema, Klein 2005*). Some data, while not definitive, suggests that the average RV owner, who is 55+ years old (see Section 3.3, **Housing, Population, and Employment** for details), is less likely to engage in the types of recreational activities (skiing, football, basketball, soccer) that are more likely to result in injury and emergency room admissions. (*National Health Statistic Reports, 2019*). This data implies that the off-site recreational activities in which the visitors to the 47° North RV resort might engage – such as hiking, given that the average age of RV visitors would be 55+/- – would not likely result in a substantial demand for hospital/emergency medical services.

Some relevant data specific to Washington State also identifies the potential for recreational injuries to be sustained during hiking. Between 1997 and 2001, a total of 535 injuries were reported at the Mt. Rainier and Olympic National Parks, which equates to an average of 20.4 incidents per million visits or 0.00002 injuries per visit. This is a low incident rate and likely not all the incidents resulted in emergency care or hospitalization.

Available local data also sheds light on the potential demand associated with the RV sites. The most recent Kittitas County *Community Health Improvement Plan*, summarizing information collected between 2018 and 2023, indicates that the biggest factors impacting Kittitas County's health and therefore health services are: being a rural area with healthcare and mental health provider shortages; and having a large older adult population, a large university student population, a significant amount of families in poverty, and lower median per capita and household incomes (*Read, Fuller 2023*). Health service impacts relating to the County's transient population/recreational visitors are not identified as a major factor.

Information on calls to the Ellensburg KOA RV Resort by KITTCOM over an eight-year period was also collected and analyzed. This data indicates that the Ellensburg RV resort -- which is a similar use occupied by transient/ recreational visitors -- generates considerably fewer calls for emergency police, fire, and hospital services -- an average of 20 calls per year, or 0.16 calls per site per year -- compared to 1.77 calls per residential unit per year for the Kittitas County residential population as a whole. Additional information is included in the following subsection on *Emergency Dispatch Service*.

Overall, therefore, national, state and local data identified through the foregoing research does not support the hypothesis that the transient/recreational-oriented population of the RV component of 47° North would generate greater than anticipated demand for emergency or hospital services. No data was provided or otherwise identified to support this assertion. The proxy population included for the RV sites already addresses, and likely overestimates, recreational tourist demand. Local data from a similar land use, in fact, suggests that demand would be lower than a typical residential unit. And it has been noted previously that the region is a popular recreational destination and that any demand associated with a transient population is already blended into each provider's calls for service and resulting staffing needs and are factors in the de facto levels of service used in the SEIS and this Addendum.

Emergency Dispatch Service

Calls for service for the Cle Elum-Roslyn-South Cle Elum Police Department, Cle Elum Fire Department, and Hospital District No. 2 from the Revised Proposal would be handled and dispatched by KITTCOM. Based on the updated staffing levels provided by KITTCOM (15 dispatchers for 47,200 people), it is anticipated that development under the Revised Proposal at buildout would generate the same need for additional staff as SEIS Alternative 6 but less than SEIS Alternative 5 in 2031 (see **Table 3.7-3**).

Although the SEIS and Addendum attribute a proxy/equivalent population to the RV component of 47° North, updated data suggests that the demand associated with this transient population may be overestimated. For example, data from Hospital District No. 2 indicates that emergency call volumes have not substantially increased over the past 7 years² despite permanent population growth and increased recreational/transient population within their service area.

In addition, KITTCOM provided historic annual call data to the existing KOA RV Park in Ellensburg (which contains 121 sites) between 2014 and 2021 (*KITTCOM, 2022*). In this 8-year period, the KOA RV Park generated an average of approximately 20 emergency calls to KITTCOM annually, which equates to approximately 0.16 calls per RV site per year. Note that emergency service calls from KITTCOM include calls for police, fire/emergency medical, and hospital service.

Based on this call generation rate derived from local data, it is estimated that the RV component in SEIS Alternative 6 and the Revised Proposal (627 sites) would generate approximately 103 emergency calls per year in total. The residential uses in SEIS Alternative 6 and the Revised Proposal would generate approximately 1.77 calls per residential unit annually, which would equate to approximately 1,339 calls per year. Therefore, based on data from a similar use located in Kittitas County, the RV sites could be expected to generate fewer calls to KITTCOM than the proposed residential units and fewer than estimated attributing a proxy/equivalent population to the Revised Proposal's RV sites. This alternative method for calculating demand suggests that the RV equivalent/proxy population metric may be overly conservative and overestimates potential demand.

Public Schools

Students. Development and associated residents during operation of the Revised Proposal would generate new students and increased demand for public school services from the Cle Elum-Roslyn School District.³ Based on the recently updated student generation rates of approximately 0.4 students per single family residence and 0.1 students per multi-family residence⁴, it is anticipated that new residential units under the Revised Proposal at buildout would generate more additional students than SEIS Alternative 6 at buildout, but less than SEIS Alternative 5 in 2031 or at buildout. The 50 affordable housing units would comprise approximately 2% of the increased student generation (see **Table 3.7-3**), while most of the increase is attributable to the district's updated student generation factors.

Based on grade level percentage information recently provided by the Cle Elum-Roslyn School District (60% elementary students, 20% middle school students, and 20% high school

² Hospital District No. 2 received 1,420 calls for service in 2022. The seven-year average (2016-2022) has been approximately 1,458 calls for service annually.

³ RV site population is not considered a permanent population on the site and as such, population associated with the RV resort is not factored into the student generation analysis.

⁴ Updated student generation rates derived from the Cle Elum-Roslyn School District in November 2022.

students), it is anticipated that of the students generated by the Revised Proposal, 140 students would be elementary school age, 47 would be middle school age, and 47 would be high school age.

As noted above in the *Affected Environment* sub-section, recent enrollment projections from the School District include updated assumptions for student generation from the Revised Proposal as well as other known anticipated development expected to occur within the school district (e.g., City Heights, Suncadia). Based on existing School District facility capacity of 970 students identified in the SEIS, it is anticipated that the projected enrollment identified in **Table 3.7-1**, a portion of which would be students from the Revised Proposal, would exceed the School District's existing facility capacity by 2024. Exceedance of the School District's facility capacity could exacerbate the need for new or expanded facilities.

Teachers. New students under the Revised Proposal would generate a need for additional teachers within the School District. Based on the School District student-to-teacher ratio (approximately 14.8 students for every teacher), new students associated with the Revised Proposal at buildout would generate the need for slightly more additional staff than SEIS Alternative 6 but less than SEIS Alternative 5 in 2031. The additional affordable housing units in the Revised Proposal would comprise approximately 2% of the anticipated demand for new teachers (see **Table 3.7-3**).⁵ This is not considered a significant change in identified impacts.

School Buses. New students under the Revised Proposal would also create additional demand for school buses to transport students to and from school. Based on approximately 45 to 60 students in a typical school bus, it is anticipated that the Revised Proposal at buildout would generate the need for more additional buses than SEIS Alternative 6 but less than SEIS Alternative 5 in 2031. The additional 50 affordable housing units in the Revised Proposal would comprise approximately 2% of the anticipated demand for additional school buses (see **Table 3.7-3**). This is not considered a significant change in identified impacts.

Indirect and Cumulative Impacts

Indirect impacts under the Revised Proposal are anticipated to be similar to SEIS Alternative 6 and could include minor additional demand for public service agencies that have mutual aid agreements with Cle Elum, such as police and fire departments. Additional indirect student generation in the Cle Elum-Roslyn School District could also occur from growth in population associated with new employment.

Cumulative impacts to public services would also be similar to SEIS Alternative 6 and would result from other development in the site vicinity and its associated population within the same time horizon. Such development would include ongoing development of the Suncadia

⁵ Note that actual future needs for new teachers would be based on student enrollment, as well as other factors such as state and local funding that is available to the School District, and future state policies and programs.

resort (in unincorporated Kittitas County), and development of the City Heights and Cle Elum Pines (in City of Cle Elum). Other smaller scale development would also likely occur in Kittitas County, City of Cle Elum, City of Roslyn, and Town of South Cle Elum. This development, together with the Revised Proposal, would generate additional population in the area which would increase demand for public services and impacts on the County, City of Cle Elum, and other nearby jurisdictions.

3.7.3 Mitigation Measures

No new significant adverse impacts to public services would occur from the Revised Proposal and no additional mitigation measures are necessary. However, data identified in the Addendum identifies uncertainty regarding some estimates of impacts, and local and national data that could influence how demand is accurately calculated. It is recommended, therefore, that the quantity of service calls for affected providers, such as for emergency response, be monitored periodically to determine actual demand. Note that a mitigation measure for fiscal impacts is also relevant.

The mitigation measure identified below includes a measure that has been updated for the Revised Proposal compared to those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

Proposed Mitigation Measures (Included in the Project)

Approved 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.

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 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.

Section 3.8 UTILITIES

The Utilities section is a summary of the *Utilities Report* (January 2023) prepared by ESM Consulting Engineers (ESM), including the *Updated Water System Analysis* (January 2023) prepared by HLA Engineering and Land Surveying (HLA), in **Appendix B**.

3.8.1 Affected Environment

2020 / 2021 SEIS & Revised Proposal

The SEIS described the existing utilities conditions on and in the vicinity of the 47° North site at that time, including water, sewer, and solid waste (see Draft SEIS Section 3.14 and Final SEIS Section 3-4 for details). Selected information from the SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

The 47° North site is largely vacant and undeveloped. An existing sewer trunk system network traverses the site. No water or solid waste collection facilities are present onsite. Existing utility providers and the capacity of their facilities remain the same as those described in the SEIS, including the City of Cle Elum for water and sewer service and Waste Management of Ellensburg for solid waste service.

3.8.2 Impacts

2020 / 2021 SEIS

As described in the SEIS, development under SEIS Alternatives 5 and 6 would generate demand for water, sewer, and solid waste service during construction and operation of the project. Water and sewer service would be provided by City of Cle Elum. The capacity of the City's water treatment plant is 6 million gallons per day (gpd) with room for expansion to 8 million gpd. The Bullfrog Flats Master Site Plan project (located on the 47° North site) was planned to be served by this water treatment plant. The City's water system would require improvements to serve SEIS Alternatives 5 and 6. The capacity of the regional Wastewater Treatment Plant (WWTP) is 3.6 million gpd; the WWTP has adequate capacity to serve the SEIS Alternatives. Solid waste service for the project would be provided by Waste Management of Ellensburg; waste would be hauled to the Cle Elum Transfer Station prior to transport to the Greater Wenatchee Land Fill for final disposal. The Cle Elum Transfer Station is nearing capacity and would require expansion and/or the extension of operating hours with the general growth in the County, including the addition of solid wastes generated by SEIS Alternatives 5 and 6.

Revised Proposal

Construction and operation of the Revised Proposal would result in increased demand for water, sewer, and solid waste service from the service providers. The analysis of the utility demands of the Revised Proposal has been updated based on new demand projections. The demand from the Revised Proposal is summarized below and compared to SEIS Alternatives 5 and 6.

Construction & Utility System Design

The design of the utility systems under the Revised Proposal would be almost identical to under SEIS Alternative 6. Like SEIS Alternative 6, the Revised Proposal would generate demand for utilities during construction. The greatest demand would be for disposal of construction and demolition (C&D) debris. **Table 3.8-1** summarizes the C&D debris under the Revised Proposal and SEIS Alternatives 5 and 6. As shown, the Revised Proposal is anticipated to generate slightly more C&D debris than SEIS Alternative 6 due to the addition of 50 affordable housing units but would generate substantially less than SEIS Alternative 5. Like SEIS Alternative 6, single family and multi-family residential units would be constructed offsite and assembled onsite, which would reduce the C&D debris generated onsite. As under SEIS Alternative 6, inert C&D debris would be collected and hauled to the Kittitas County Inert/Demolition Debris Waste Landfill at Ryegrass in Ellensburg, while non-inert C&D debris would be collected and hauled to the Cle Elum Transfer Station.

**Table 3.8-1
CONSTRUCTION & DEMOLITION DEBRIS GENERATION SUMMARY –
REVISED PROPOSAL, SEIS ALT. 5, & SEIS ALT. 6**

	Revised Proposal		SEIS Alternative 6		SEIS Alternative 5 ¹	
	Residential	Non-residential	Residential	Non-residential	Residential	Non-residential
Full Buildout Total (tons) ²	2,506	427	2,413	455	5,955	1,939

Source: ESM Engineers, 2023.

¹ Excludes the Reserve Area.

² Buildout total represents the cumulative total quantity for the Revised Proposal and SEIS Alt. 6 by year 2031 and for SEIS Alt. 5 by year 2051.

Operation

As under SEIS Alternative 6, operation of the residential, commercial, and RV resort uses under the Revised Proposal would generate demand for water, sewer, and solid waste service, as described below. The Revised Proposal would be served by the same utility providers as SEIS Alternative 6.

Water

Sufficient water rights are available to serve SEIS Alternative 5 and 6, as well as the Revised Proposal. New Suncadia's water rights have been put into Ecology's Water Rights Program. Transfer of water rights to the city is pending.

Treated water demands were calculated for the Revised Proposal and compared to SEIS Alternatives 5 and 6, including the average daily treated water demands (see **Table 3.8-2**); and the maximum month treated water demands (see **Table 3.8-3**), both at buildout in 2031.

**Table 3.8-2
AVERAGE DAILY TREATED WATER DEMANDS –
REVISED PROPOSAL, SEIS ALT. 5, & SEIS ALT. 6**

Alt. No.	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Avg.	Total (ac-ft)
Revised Proposal	0.18	0.18	0.18	0.18	0.18	0.28	0.38	0.32	0.28	0.18	0.18	0.18	0.22	248
SEIS Alt. 6 ¹	0.17	0.17	0.17	0.17	0.17	0.27	0.36	0.31	0.27	0.17	0.17	0.17	0.22	238
SEIS Alt. 5 ²	0.31	0.31	0.31	0.31	0.31	0.41	0.50	0.45	0.41	0.31	0.31	0.31	0.35	389

Source: ESM Engineers, 2023.

¹ Calculations for SEIS Alt. 6 include the off-site commercial property.

² Excludes the Reserve Area.

**Table 3.8-3
MAXIMUM MONTH TREATED WATER DEMANDS –
REVISED PROPOSAL, SEIS ALT. 5, & SEIS ALT. 6**

	Average Daily Demand (ADD) ^{1, 2}	Maximum Day Demand (MDD) ^{1, 3}	Peak Hour Demand (PHD) ^{1, 4}
Revised Proposal	0.29 mgd (203 gpm)	0.76 mgd (527 gpm)	1.52 mgd (1,054 gpm)
SEIS Alt. 6 ⁵	0.28 mgd (195 gpm)	0.73 mgd (508 gpm)	1.46 mgd (1,017 gpm)
SEIS Alt. 5 ⁶	0.38 mgd (265 gpm)	1.50 mgd (1,042 gpm)	3.00 mgd (2,085 gpm)

Source: ESM Engineers, 2023.

¹ For treated water, the daily system loss and demand contingency is calculated as total annual demand x 10%

² ADD is calculated as average month estimated demand (residential and commercial) + irrigation + system loss.

³ MDD was obtained from Table 3 of the HLA memorandum dated January 5, 2023.

⁴ PHD was obtained from Table 3 of the HLA memorandum dated January 5, 2023.

⁵ Calculations for SEIS Alt. 6 include the off-site commercial property.

⁶ Excludes Reserve Area.

Uses original 2002 EIS calculations and 1.5 MDD and 2.2 PHD peaking factors.

Treated water demand for the Revised Proposal is anticipated to be slightly greater than SEIS Alternative 6 due to the inclusion of the 50 affordable housing units and the slight change in the mix of commercial uses. However, treated water demand for the Revised Proposal would be substantially less than SEIS Alternative 5.

A preliminary storage and pump analysis for the City of Cle Elum water system was also completed for the Revised Proposal together with the development of the City Heights

project (see **Appendix B**). Similar to SEIS Alternative 6, the analysis determined that sufficient water supply exists, but the City's current water system is not sufficient to meet the projected water demand or storage requirements and improvements would be necessary. These improvements would be the same as those identified for SEIS Alternative 6 and include: a new filter train, a new Zone 3 finished water pump, and a new Zone 3 reservoir storage. However, the project's proportionate share has increased somewhat relative to SEIS Alternative 6 due to project changes and revised demand factors. To confirm the proportionate share responsibility for the Revised Proposal a monitoring/metering plan should be provided that would adjust allocation on an actual demand basis and be used to determine when capacity improvements would be triggered.

Like SEIS Alternative 6, untreated water is not proposed to be used for the Revised Proposal at this time. However, untreated water may be used in the future for recreational and public landscape irrigation. If untreated water is used in the future, it would reduce treated water consumption.

Like Alternative 6, fire flow and domestic water demand requirements account for all buildings other than residential to be sprinklered. All proposed construction will be evaluated in accordance with City of Cle Elum requirements and the International Fire Code, by the City of Cle Elum Fire Chief for compliance with applicable fire protection safety standards.

Sewer

Table 3.8-4 summarizes the monthly wastewater flow under the Revised Proposal, as well as SEIS Alternatives 5 and 6 at buildout. As shown, monthly wastewater flow would be slightly greater for the Revised Proposal than SEIS Alternative 6 but would be less than SEIS Alternative 5. Estimated wastewater loadings, in terms of biochemical oxygen demand (BOD) and total suspended solids (TSS) under the Revised Proposal are presented in **Table 3.8-5** and are compared to SEIS Alternatives 5 and 6. The BOD demand calculations for the Revised Proposal differ from those for SEIS Alternatives 5 and 6 for several reasons, including: unknown factors from the 2002 EIS (e.g., regarding numbers of employees and visitors), assumptions that were made (e.g., regarding people per unit), and the inclusion of the required affordable housing units in the analysis of the Revised Proposal.

The allocation of the wastewater treatment facility (WWTP) capacity among regional partners is addressed in an agreement that was entered into in 2002 and amended in 2008, between the City of Cle Elum, Town of South Cle Elum, City of Roslyn, and Trendwest Investments (the former owners of the Suncadia resort) and described in the SEIS. Similar to SEIS Alternative 6, wastewater capacity within the existing city facilities has been designed and specifically reserved to accommodate proposed development in the Cle Elum UGA.

Table 3.8-4
MONTHLY WASTEWATER FLOW (MGD)¹ –
REVISED PROPOSAL, SEIS ALT. 5, & SEIS ALT. 6

Alt.	Year	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Average Annual
Revised Proposal	30 w/o I/I ²	0.18	0.18	0.18	0.18	0.18	0.22	0.22	0.22	0.18	0.18	0.18	0.18	0.19
Revised Proposal	30 w/ I/I	0.21	0.22	0.22	0.21	0.21	0.24	0.24	0.24	0.20	0.20	0.20	0.20	0.22
SEIS Alt. 6 ³	30 w/o I/I ²	0.17	0.17	0.17	0.17	0.17	0.21	0.21	0.21	0.17	0.17	0.17	0.17	0.18
SEIS Alt. 6 ³	30 w/ I/I	0.21	0.21	0.19	0.19	0.19	0.23	0.23	0.23	0.19	0.19	0.19	0.19	0.20
SEIS Alt. 5 ⁴	30 w/o I/I	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24	0.24
SEIS Alt. 5 ⁴	30 w/ I/I	0.29	0.30	0.29	0.28	0.27	0.26	0.26	0.26	0.26	0.26	0.26	0.26	0.27

Source: ESM Engineers, 2023.

¹ Includes wastewater flows from the commercial development.

² I/I represents infiltration and inflow, which varies by month from 10% to 25% of maximum month inside wastewater production. The Cle Elum region has high I/I in the months of February and March when the river/groundwater elevations are up.

³ Calculations for SEIS Alt. 6 include the off-site commercial property.

⁴ Excludes the Reserve Area

Table 3.8-5
PROJECTED WASTEWATER LOADINGS (LB PER DAY)¹ –
REVISED PROPOSAL, SEIS ALT. 5, & SEIS ALT. 6

Alternative	BOD&TSS	Buildout
Revised Proposal	Annual Average	718
	Max. Month Average (Aug.)	754
SEIS Alt. 6 ²	Annual Average	694
	Max. Month Average (Aug.)	733
SEIS Alt. 5 ³	Annual Average	699
	Max. Month Average (Aug.)	738

Source: ESM Engineers, 2023.

¹ Includes wastewater flows for commercial development demand.

² Calculations for SEIS Alt. 6 include the off-site commercial property.

³ Excludes the Reserve Area.

Solid Waste

Table 3.8-6 summarizes solid waste production at buildout of the Revised Proposal compared to SEIS Alternatives 5 and 6. As shown, the Revised Proposal would generate slightly more solid waste than SEIS Alternative 6 and SEIS Alternative 5. The estimated solid waste could be further reduced with an effective recycling program. Kittitas County Solid Waste will determine whether the Revised Proposal is responsible to mitigate impacts for its proportional share of the costs associated with improvements to the Cle Elum Transfer Station and Ryegrass Landfill.

Table 3.8-6
SOLID WASTE PRODUCTION (TONS/YEAR) –
REVISED PROPOSAL, SEIS ALT. 5, & SEIS ALT. 6

Buildout Year	Revised Proposal	SEIS Alt. 6	SEIS Alt. 5 ¹
Municipal	2,192	2,074	2,712
Yard	137	131	171
Hazardous/Moderate Risk ²	14	13	17
Total Buildout (tons/year)³	2,343	2,218⁴	2,900

Source: ESM Engineers, 2023.

¹ Excludes the Reserve Area.

² Includes non-residential hazardous waste.

³ Buildout total represents the cumulative total quantity for the Revised Proposal and SEIS Alt, 6 by year 2031 and for SEIS Alt. 5 by year 2051.

⁴ Calculations for SEIS Alt. 6 include the off-site commercial property.

Indirect and Cumulative Impacts

Similar to SEIS Alternative 6, development under the Revised Proposal, in combination with other growth in the area (including Suncadia Master Planned Resort, City Heights, and Cle Elum Pines), would cumulatively increase impacts on utilities and hasten the need for utility improvements (e.g., improvements to the city's water system, including: a filter train in the water treatment plant, a finished water pump in Zone 3, and a reservoir in Zone 3). The City of Cle Elum plans for operations and upgrades to their utility systems based on forecasts of future growth in the city's utility service areas and will implement improvements to the systems as they are needed, with pro-rata contributions from new development.

3.8.3 Mitigation Measures

No new significant adverse impacts on utilities would occur from the Revised Proposal and no additional mitigation measures are recommended. The mitigation measure identified below includes a measure that has been updated for the Revised Proposal from those listed in the Final SEIS. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

Required Mitigation Measures

Solid Waste

- ~~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.~~

Section 3.9

FISCAL CONDITIONS

The Fiscal Conditions section is a summary of the *Fiscal Conditions Report* (February 2023) prepared by ECONorthwest in **Appendix E**. The reader should consult the full report for more detailed information.

3.9.1 Affected Environment

2020 / 2021 SEIS

The SEIS described the existing fiscal and economic conditions on and in the vicinity of the 47° North site at that time, including the fiscal conditions in City of Cle Elum (including for police and fire service) and for other local service providers, such as Hospital District No. 2, KITTCOM, and Cle Elum – Roslyn School District (see Draft SEIS Section 3.15 and Final SEIS Section 3-7 for details). Selected information from the SEIS is provided and compared in context below; please consult the SEIS document for more detailed information.

3.9.2 Impacts

2020 / 2021 SEIS

The temporary and permanent jobs under any of the SEIS Alternatives are expected to result in positive impacts to the local economy. SEIS Alternative 5 would generate more jobs due to its greater amount of development onsite. Both SEIS Alternatives would increase the tax base and increase the demand for services in each of the taxing jurisdictions evaluated. At buildout, both SEIS Alternatives would generate fiscal surpluses to the City of Cle Elum. The future commercial component of SEIS Alternative 6 could generate fiscal shortfalls in the city in earlier years but would ultimately generate surpluses; the 47° North residential and recreational component would generate fiscal surpluses in the city throughout buildout. While costs could exceed tax revenues for other public service purveyors (e.g., Hospital District No. 2, KITTCOM, and Cle Elum – Roslyn School District), mitigation may or may not be required, as the analysis only includes tax revenues and excludes other significant funding sources such as charges for service or intergovernmental revenues.

Revised Proposal

The updated fiscal impact analysis considers the marginal fiscal effects of 47° North by comparing the additional revenue generated by the development with the additional operational costs needed to serve the development. The focus of the revenue analysis is on local tax revenues. Comparing revenues and costs from development is a complicated task. For example, city revenues derived from development (e.g., property tax, sales tax, real

estate excise tax (REET), and other taxes or fees) all flow to different funds, some of which are available for use citywide in an annual budgeting process, and some of which are restricted in use in different ways.

Revenues also accrue over a period and may not be available at the time that a cost is incurred. In the updated analysis, the approach taken is to estimate the present value of the total costs of providing service increases, and the present value of total revenue sources that are available to the city and other service providers. The analysis relies on a set of assumptions about revenues and costs which are plugged into a cash flow revenue model. The model is also based on development assumptions, including phasing and timing of development, to estimate changes in affected taxes. Assumptions about the type, value, and timing of development were provided by the Applicant. The development of the project would also fuel the growth of tax bases attributable to 47° North. (See **Appendix E** for details on these assumptions.)

The updated fiscal impact analysis builds on the previous Draft SEIS and Final SEIS analyses and compares the fiscal impacts of the Revised Proposal to SEIS Alternative 6. As appropriate, references are made to SEIS Alternative 5 as well. No methods in the analysis have changed from the previous analysis; however, several assumptions have been updated in this updated analysis. These changes are described below.

Assumptions

Time Frame

The base year of the updated analysis incorporates information collected in 2022. The time horizon of the analysis shows impacts through 2037. The buildout year for the Revised Proposal is 2031 but 2037 is retained as an endpoint for the analysis so it can be compared to buildout of SEIS Alternative 6.

Development Program and Timing

The updated development program provided by the Applicant differs from SEIS Alternative 6 in the following ways:

- **Timing.** Development in the revised program reaches full buildout sooner in the analysis period (2031).
- **Valuation.** The Applicant has provided detailed information related to the following elements of their program:
 - Market valuation of the commercial and residential properties;
 - Construction costs of the commercial and residential properties;
 - Economic productivity estimates of the commercial properties; and
 - Land preparation and infrastructure construction estimates of the commercial and residential properties.

With respect to timing, the amount of buildout varies between the alternatives:

- Alternative 5 assumed development occurring in phases starting in 2021 and reaching full buildout in 2051.
- Alternative 6 assumed development occurring in phases starting in 2021 and reaching full buildout in 2037.

The implication of these timing disparities between SEIS Alternative 5 and 6, and the Revised Proposal, presents challenges that makes simple yearly comparisons between alternatives very difficult. These include:

- Annual revenues are influenced by the degree of one-time construction related taxes versus the on-going operational taxes that flow once buildings are occupied. An extended buildout will have a larger share of one-time revenues as part of its total revenue mix.
- Annual expenditures are driven by the development program. A program that delivers buildout earlier will reach the full extent of the public service impacts sooner.

As a result, comparing the impacts of the Revised Proposal several years post-buildout to SEIS Alternative 6 at buildout is not an apples-to-apples comparison. The decrease in one-time revenues that is observed post-buildout would, in fact, occur for any of the alternatives after construction is complete.

Tax Policy

Tax policy was updated for all the affected jurisdictions. Please refer to **Appendix E** for details.

Public Service Costs

Outside of the changes to the estimated staffing impacts identified in the Section 3.7, **Public Services**, the fiscal analysis has also updated employee compensation estimates. As analyzed in Public Services, staff are incurred on a prorated basis depending on the amount of population (households and RV effective population) in any given year depending on buildout. The updated proposal by Sun Communities also assumes that all roads, parks, and utilities will be privately constructed and maintained, which results in no public works or parks service responsibilities by the City of Cle Elum and, therefore, no cost impacts in these areas.

City of Cle Elum

The City of Cle Elum is the local service provider for police, fire, public works, community development, parks, and other local services. To support these services, the city collects a range of general and restricted taxes. Tax revenues are estimated in three categories:

- **One-time Revenues.** These general-purpose revenues (or for public safety) are tied to the construction of housing and commercial products. Specifically, they include the retail sales tax on construction (material and labor).
- **Recurring Revenues.** These general-purpose revenues (or for public safety) are derived from the occupation of residential and commercial structures by residents,

businesses, and employees. Specific revenues include the property tax, retail sales tax (resulting from new sales tax sourcing rules), and utility taxes.

- **Restricted Revenues.** These revenues are statutorily restricted to fund certain capital expenses and are generally not available to fund public safety service costs. Specific revenues include the REET and hotel-motel tax.

See **Appendix E** for additional descriptions and assumptions for property taxes, sales and use taxes, utility taxes, state shared motor vehicle fuel tax and liquor board tax, business license fees, REET, and special hotel/motel tax.

Tax revenues are calculated based on the changes in the components of the city's tax base resulting from development at the site. Elements of growth that influence revenues include the timing, scale, and quality of the project's development as well as the population and employment impacts of the development once complete.

The Revised Proposal also assumes that all roads, parks, and utilities will be privately constructed and maintained, which results in there being no public works or parks service responsibilities for the City of Cle Elum and, therefore, no cost impacts in these areas. Therefore, the analysis seeks to isolate general tax revenues and public safety restricted revenues that can be used to fund police and fire related costs. Unrestricted revenues, in contrast, can be dedicated to areas where no service impacts are anticipated.

Police Services

Section 3.7, **Public Services**, estimates the officers that would be needed at development buildout of the Revised Proposal. Officers are added to meet proportionate demand based on the officer to population growth ratios used in the that section. See Section 3.7, **Public Services**, of this Addendum and the Public Services section in the Draft SEIS for additional information about the different methods for estimating demand. Note that the population method includes the population from the proposed residential units, as well as a proxy population calculated for the RV sites to conservatively analyze impacts on police service. As explained in Section 3.7, **Public Services**, the RV proxy population used in the analysis is likely overly conservative and overestimates probable impacts associated with the RV element of the proposal.

The city's police department submitted staffing and cost information for the project's impacts on police service using a methodology recommended by the International City Managers Association (ICMA). Section 3.7, **Public Services**, estimates the need for police officers using both a population-based to service-based formula and the police department's ICMA method. The full allotment of officers is required upon buildout in 2031 (e.g., officers are added to meet proportionate demand based on the officer to population growth ratios used in Section 3.7, **Public Services**). The police department's ICMA method assumes 1/2 of the officers are brought on in 2023 and the remaining 1/2 are added in 2027. However, the methods and assumptions used by the department to determine

timing were not documented in a manner such that the analysis could be explained, reproduced, or incorporated in this updated fiscal impact analysis.

Fire Services

Section 3.7, **Public Services**, estimates the firefighters that would be needed at development buildout under the Revised Proposal. Firefighters are added to meet demand proportionate to population growth at 47° North (see the note above and in the Public Services section regarding the RV proxy population).

Fiscal Impacts

Table 3.9-1 and **Table 3.9-2** summarize the cost and revenue impacts of the 47° North development under the Revised Proposal to the City of Cle Elem. On the revenue side, the summary includes restricted revenues of REET, the hotel-motel tax, and the motor vehicle fuel tax (as part of state shared revenues) that cannot be used to fund police or fire service costs. By 2031, annual City costs are estimated to be \$1.1 million, and revenues are estimated to be more than \$2.3 million. By 2037, annual city costs are estimated to be \$1.4 million a year and annual city revenues are estimated to be \$2.1 million a year. As noted above, comparing the Revised Proposal six years after buildout (2037) to Alternative 6 at buildout in 2037 may not be an apples-to-apples comparison; see Table 3-5 in the Final SEIS for a city cost and revenue summary for SEIS Alternative 6.

Table 3.9-1
SUMMARY OF COST IMPACTS FOR CLE ELUM – REVISED PROPOSAL

	2023	2024	2025	2026	2027	2028	2029	2030
Police	\$0	\$197,000	\$405,000	\$581,000	\$766,000	\$835,000	\$908,000	\$935,000
Fire	\$0	\$37,000	\$75,000	\$108,000	\$143,000	\$155,000	\$169,000	\$174,000
Total	\$0	\$233,000	\$481,000	\$689,000	\$908,000	\$991,000	\$1,077,000	\$1,109,000

	2031	2032	2033	2034	2035	2036	2037
Police	\$963,000	\$992,000	\$1,022,000	\$1,053,000	\$1,084,000	\$1,117,000	\$1,150,000
Fire	\$179,000	\$185,000	\$190,000	\$196,000	\$202,000	\$208,000	\$214,000
Total	\$1,142,000	\$1,177,000	\$1,212,000	\$1,248,000	\$1,286,000	\$1,324,000	\$1,364,000

Source: ECONorthwest, 2023.

Table 3.9-2
SUMMARY OF REVENUE IMPACTS FOR CLE ELUM – REVISED PROPOSAL

	2023	2024	2025	2026	2027	2028	2029	2030
Property Tax	\$0	\$199,000	\$404,000	\$549,000	\$698,000	\$759,000	\$822,000	\$840,000
Sales Tax on Construction	\$587,000	\$605,000	\$415,000	\$427,000	\$112,000	\$115,000	\$35,000	\$36,000
Sales Tax Ongoing	\$0	\$83,000	\$171,000	\$209,000	\$250,000	\$290,000	\$333,000	\$376,000
Utility Taxes	\$36,000	\$73,000	\$102,000	\$133,000	\$144,000	\$155,000	\$160,000	\$165,000
Criminal Justice & Public Safety	\$0	\$43,000	\$89,000	\$123,000	\$159,000	\$180,000	\$203,000	\$209,000
State Shared Taxes	\$0	\$16,000	\$34,000	\$47,000	\$60,000	\$68,000	\$77,000	\$79,000
Business License Fees	\$0	\$0	\$1,000	\$1,000	\$1,000	\$1,000	\$2,000	\$2,000
REET	\$0	\$236,000	\$269,000	\$208,000	\$230,000	\$230,000	\$249,000	\$149,000
Hotel-Motel Tax	\$0	\$101,000	\$209,000	\$314,000	\$424,000	\$437,000	\$450,000	\$464,000
Total	\$623,000	\$1,256,000	\$1,484,000	\$1,698,000	\$1,654,000	\$1,800,000	\$1,881,000	\$1,857,000

	2031	2032	2033	2034	2035	2036	2037
Property Tax	\$858,000	\$866,000	\$875,000	\$884,000	\$893,000	\$902,000	\$912,000
Sales Tax on Construction	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Sales Tax Ongoing	\$422,000	\$434,000	\$448,000	\$461,000	\$475,000	\$489,000	\$504,000
Utility Taxes	\$170,000	\$174,000	\$178,000	\$183,000	\$187,000	\$192,000	\$197,000
Criminal Justice & Public Safety	\$215,000	\$222,000	\$228,000	\$235,000	\$242,000	\$249,000	\$257,000
State Shared Taxes	\$82,000	\$84,000	\$87,000	\$89,000	\$92,000	\$95,000	\$97,000
Business License Fees	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000	\$2,000
REET	\$618,000	\$157,000	\$161,000	\$165,000	\$169,000	\$173,000	\$177,000
Hotel-Motel Tax	\$478,000	\$492,000	\$507,000	\$522,000	\$538,000	\$554,000	\$570,000
Total	\$2,366,000	\$1,939,000	\$1,978,000	\$2,019,000	\$2,060,000	\$2,102,000	\$2,145,000

Source: ECONorthwest, 2023.

Table 3.9-3 summarizes the net annual surplus or deficit of the estimated costs and revenues. For revenues, restricted revenues of the REET, hotel-motel tax, and motor vehicle fuel taxes are excluded from the balance since they cannot be used to fund these public services. Development at 47° North is estimated to create fiscal surpluses that accumulate over time; \$8.7 million in restricted revenues are excluded from the general revenue fund and would be additive to this operating surplus.

By year 2037, which is six years after buildout of the Revised Proposal, the city is estimated to have a cumulative revenue surplus of \$2.9 million of general revenues to support police and fire expenses with the Revised Proposal. Initial annual surplus revenues coming from one-time sales taxes on construction would fall once development is complete and would combine with rising services costs to produce a situation where annual surpluses would give way to a small deficit only in 2037. However, on top of the \$2.9 million in cumulative general revenues to support police and fire, the city would also have an additional \$9.7 million in other restricted revenues for which it has no corresponding public service cost to account for; this amount is additive to the \$2.9 million cumulative surplus in 2037 covering public safety costs.

Table 3.9-3
SURPLUS/DEFICIT OF COSTS AND REVENUES FOR CLE ELUM – REVISED PROPOSAL

	2023	2024	2025	2026	2027	2028	2029	2030
Total Costs	\$0	\$233,000	\$481,000	\$689,000	\$908,000	\$991,000	\$1,077,000	\$1,109,000
Total Non-Restricted Revenues	\$623,000	\$911,000	\$990,000	\$1,154,000	\$972,000	\$1,101,000	\$1,146,000	\$1,207,000
Annual Surplus/Deficit	\$623,000	\$678,000	\$509,000	\$465,000	\$64,000	\$110,000	\$69,000	\$98,000
Cumulative Impact	\$623,000	\$1,301,000	\$1,810,000	\$2,275,000	\$2,339,000	\$2,449,000	\$2,518,000	\$2,616,000
Other Cumulative Restricted Revenues	\$0	\$345,000	\$839,000	\$1,383,000	\$2,065,000	\$2,764,000	\$3,499,000	\$4,149,000

	2031	2032	2033	2034	2035	2036	2037
Total Costs	\$1,142,000	\$1,177,000	\$1,212,000	\$1,248,000	\$1,286,000	\$1,324,000	\$1,364,000
Total Non-Restricted Revenues	\$1,231,000	\$1,250,000	\$1,269,000	\$1,290,000	\$1,309,000	\$1,330,000	\$1,352,000
Annual Surplus/Deficit	\$89,000	\$73,000	\$57,000	\$42,000	\$23,000	\$6,000	-\$12,000
Cumulative Impact	\$2,705,000	\$2,778,000	\$2,835,000	\$2,877,000	\$2,900,000	\$2,906,000	\$2,894,000
Other Cumulative Restricted Revenues	\$5,284,000	\$5,973,000	\$6,682,000	\$7,411,000	\$8,162,000	\$8,934,000	\$9,727,000

Source: ECONorthwest, 2023.

Comparison of Revised Alternative to SEIS Alternative 5 & SEIS Alternative 6

The SEIS estimated that Alternative 5 and Alternative 6 would result in cumulative fiscal surpluses to the city in 2037 (\$4.4 million and \$956,000, respectively). The fiscal surplus of the Revised Proposal would similarly result in a positive surplus at buildout in 2031.

Hospital District No. 2

Kittitas Hospital District No. 2 operates Medic One ambulance services and responds to calls from a point about halfway to Ellensburg all the way to Snoqualmie Pass. The district also owns Kittitas Valley Healthcare (KVH) Family Medicine Clinic in Cle Elum and leases the clinic building to Kittitas Valley Healthcare (Hospital District No.1) for their operation of the KVH Family Medicine (Cle Elum Rural Health Clinic). Kittitas Valley Healthcare operates an Urgent Care Clinic in Cle Elum.

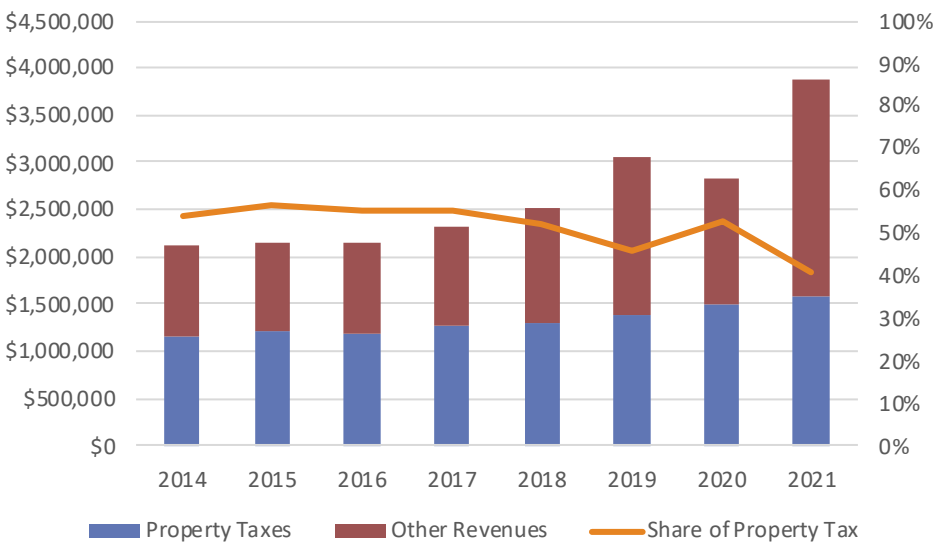
Tax Revenues

The Hospital District collects two distinct property tax levies to fund two different services: one based on a permanent EMS levy and the other a regular levy (see **Appendix E** for details on these levies).

Other Revenues

Reoccurring revenues received by Hospital District No. 2 include patient/service fees and property taxes. **Figure 3.9-1** summarizes the district's cumulative revenues received through their operating property tax levies (EMS and hospital) and other revenue sources. In 2021, patient service fees and other revenues accounted for about 59% of the district's total revenues. This fiscal analysis assumes that service fees could scale to meet additional costs beyond revenues provided by property tax revenues alone, as they have historically. For example, if new hires are required to accommodate increased service needs, then revenues from services fees would theoretically increase too.

**Figure 3.9-1
SUMMARY OF KITTITAS HOSPITAL DISTRICT NO.2 REVENUES**



Source: Washington State Auditor Financial Intelligence Tool, 2022.

Fiscal Impacts

The analysis of fiscal impacts to Hospital District No. 2 is based on the personnel that would be added to meet demand proportionate to population growth at 47° North under the Revised Proposal at buildout in 2031. As noted previously, the population used to estimate impacts includes a proxy RV population factor which is likely overly-conservative. (See Section 3.7, **Public Services**, for details.)

Medic One

The cost and revenue impacts of the Revised Proposal are summarized in Exhibits 7 and 8 in **Appendix E**. Medic One supports its services through a combination of property taxes and charges for its services. Results in the referenced exhibits show only the property tax component of revenues relative to increased personnel costs and, therefore, presents an incomplete and inaccurate picture of the future fiscal condition and highlights the disparity inherent in the tax revenue stream. Although costs are higher than property tax revenues in the analysis, Medic One also receives user service charges that make up a large proportion of its total revenues.

The analysis assumes that patient service fees could scale to meet additional costs beyond revenues provided by property tax revenues. For example, if new hires are required to accommodate increased service needs, then revenues from services fees would increase as well per charges for service from the district. Again, this is a key assumption, but this analysis has no publicly available data from the district to rule out if there is a structural issue between its cost for service relative to the combination of fees and taxes it receives. However, the district has grown its beginning fund balances over time during a period where both property taxes continue to grow while also representing a smaller share of

overall revenues. In 2014, for example, it had a beginning balance of \$3,435,567 which had grown to \$6,366,267 in 2021.¹ In summary, the analysis finds that all service impacts and any hypothetical shortfalls could be wholly offset by adjusting patient service fees.

Cle Elum Clinic

The cost and revenue impacts of the Revised Proposal are summarized in Exhibits 9 and 10 in **Appendix E**. Results show only the property tax component of revenues relative to increased personnel costs and excludes patient charges for service.

The Cle Elum Clinic is run by Kittitas Valley Healthcare (Hospital District No.1) but supported in part by Hospital District No.2 through their ownership of the facility. District No.2 owns the clinic building and receives rent payments from District 1. Although costs are higher than property tax revenues in the analysis, the clinic also receives user service charges that make up most of its revenue base. The analysis assumes that patient service fees could scale to meet additional costs beyond revenues provided by property tax revenues.

For example, if new hires are required to accommodate increased service needs, then revenues from services fees would increase as well per charges for service from the district. Kittitas Valley Healthcare states that its services are almost exclusively supported by revenue generated from patient services.² Services provided to 47° North residents and visitors would be supported by fees charged to those patients in the same manner as existing residents pay for their services. District No. 2 also receives property taxes and as well as payments made by Kittitas Valley Healthcare to District No. 2 for lease of the medical facility. In summary, the analysis finds that all service impacts and any hypothetical shortfalls could be wholly offset by adjusting patient service fees.

Comparison of Revised Alternative to SEIS Alternative 5 & SEIS Alternative 6

The SEIS fiscal analysis estimated that SEIS Alternative 5 and Alternative 6 would generate more in service costs than property tax revenues by 2037. The same would be true of the Revised Proposal if only tax revenues are considered. However, District No. 2 revenues come primarily from patient user fees rather than property taxes, so considering property tax revenues alone provides an incomplete and inaccurate picture of fiscal conditions. The SEIS noted that service fees have scaled to meet costs beyond property tax revenue in past years and that condition would likely continue in the future.

Hospital District No. 1

Hospital District No. 1 provides care to Kittitas County and surrounding areas. The public hospital district is governed by a five-member elected Board of Commissioners and is almost exclusively supported by revenue generated from patient services. The SEIS did not evaluate fiscal impacts to Hospital District No. 1 because the 47° North property is not within the district's taxing district. Similarly, the 2002 Bullfrog Flats Master Site Plan EIS did not evaluate fiscal impacts to the district.

¹ Office of the Washington State Auditor, Financial Intelligence Tool, 2022.

² <https://www.kvhealthcare.org/about-us/>

Revenues

The City of Cle Elum, and therefore 47° North are not located within the district's boundary and taxing area; therefore, there is no property tax revenue that currently accrues to the district, and none would accrue to the district from the Revised Proposal. However, the site is broadly within the district's service area (it is the closest regional hospital) and 47° North would result in additional demand for services from the district and associated cost impacts, as described below. Note that District No. 1 also operates the Cle Elum Clinic, which is owned by District No. 2 and discussed above.

District No. 1 generates almost all revenues from user fees and states in published information that its services are almost exclusively supported by revenue generated from patient services.³ Its main recurring revenue sources include patient/service fees and other sources of funds including its property tax levy and grants. In 2021, the district collected \$5,061 in property taxes which is 0.004% of its total revenue of \$118,867,617.

Fiscal Impact

The fiscal impact analysis of the Revised Proposal to Hospital District No. 1 is based on the personnel that would be added to meet demand proportionate to population growth at 47° North at buildout in 2031. As noted previously, the population used to estimate impacts includes a proxy RV population factor which is likely overly-conservative. (See Section 3.7, **Public Services**, for details.) The analysis finds that all service impacts and any hypothetical shortfalls could be wholly offset by adjusting patient service fees.

KITTCOM

Revenues

KITTCOM is funded primarily by intergovernmental revenue as well as fees paid by emergency service subscribers (which varies by subscriber based on the dispatch service costs) and through monthly excise taxes levied on telephone lines (\$0.70 per line: land, mobile, and voice over internet protocol (VOIP)).

Fiscal Impacts

The fiscal impacts of the Revised Proposal to KITTCOM are analyzed based on the personnel that would be added to meet estimated demand in proportion to population growth at 47° North at buildout in 2031. As noted previously, the population used to estimate impacts includes a proxy RV population factor which is likely overly conservative and overstates probable demand. (See Section 3.7, **Public Services**, for details.)

Exhibits 11 and 12 in **Appendix E** summarize the cost and revenue impacts of the Revised Proposal. Reoccurring revenues received by KITTCOM predominately include intergovernmental revenues, fees paid by emergency service subscribers, and a monthly tax

³ <https://www.kvhealthcare.org/about-us/>

applied to telephone lines. Residents of 47° North are expected to pay similar levels of line fees per household as existing residents of the city (and the district as a whole). Line charge revenues at buildout in 2031 are estimated to be \$13,000, while projected new staffing costs are estimated at \$135,000. The analysis is limited to line charge revenues, however, and estimates of intergovernmental revenues and/or subscriber fees, which historically have and could be restructured to cover additional funding needs, are not included. Line charge revenues alone, therefore, provide an incomplete and inaccurate picture of fiscal conditions.

Comparison of Revised Alternative to SEIS Alternative 5 & SEIS Alternative 6

The SEIS fiscal analysis estimated that both Alternative 5 and Alternative 6 would generate more in service costs than line tax revenues by 2037. However, it was noted that subscriber fees could scale to meet costs beyond line fee revenue as has been the case historically for KITTCOM. The Revised Proposal reflects the same conclusion as SEIS Alternative 5 and SEIS Alternative 6.

Cle Elum – Roslyn School District

Tax Revenues

Property Tax

In 2019, maintenance and operations levies proposed by local school districts and approved by voters were replaced by enrichment levies as part of the state's McCleary resolution. Enrichment levies are capped based on assessed value or per full-time equivalent student. For taxes due in 2020 and beyond, the levy cap for voter-approved enrichment levies has increased. See **Appendix E** for details on how the cap is used in the updated fiscal analysis. For the analysis, households are transformed into students using the district's student generation rate and the incremental levy impact is computed by the growth in students coming from 47° North.

Fiscal Impact

The fiscal impacts analysis of the Revised Proposal on Cle Elum-Roslyn School District is based on the teachers and buses that would be added to meet demand proportionate to permanent resident growth/student generation at 47° North at buildout in 2031. As noted previously, the population used to estimate impacts includes a proxy RV population factor which is likely overly-conservative. (See Section 3.7, **Public Services**, for details.)

Exhibits 13 and 14 in **Appendix E** summarize the cost and revenue impacts of the Revised Proposal. While costs exceed enrichment levy revenues, this single tax presents an incomplete picture of school district revenues. The district would also receive intergovernmental revenues, the majority through state school funding support, which accounts for over 75% of total district revenues. The analysis assumes that these sources of state and federal support could scale to meet these service costs. The impact on the school's main enrichment levy would be the same for every student generated within the

development as it is for the existing district due to the changes in how local enrichment levies function after the McCleary resolution.

Comparison of Revised Alternative to SEIS Alternative 5 & SEIS Alternative 6

The SEIS fiscal analysis estimated that both Alternative 5 and Alternative 6 would generate more in service costs than local property tax revenues by 2037. The Revised Proposal would similarly generate greater costs than local revenues. However, the SEIS and this analysis note that local revenues are not the primary source of district funding; intergovernmental funds have scaled to meet costs beyond local property tax revenue historically and are expected to do the same in the future.

3.9.3 Mitigation Measures

No new, significant or materially different fiscal impacts would occur from the Revised Proposal and no additional mitigation measures are recommended.

The mitigation measure identified below is updated to provide additional considerations relating to fiscal monitoring; monitoring was recommended in the Final SEIS and would similarly apply to the Revised Proposal. See **Appendix F** for a complete list of the mitigation measures under the Revised Proposal, including additional discussion of monitoring. See the Introduction to **Chapter 3** for a description of the different categories of mitigation (e.g., proposed, required, other possible).

City of Cle Elum

- 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.

CHAPTER 4

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