

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^o North Master Site Plan Amendment Final SEIS* (2021); it documents and evaluates impacts associated with the Revised 47^o 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 47^o 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.