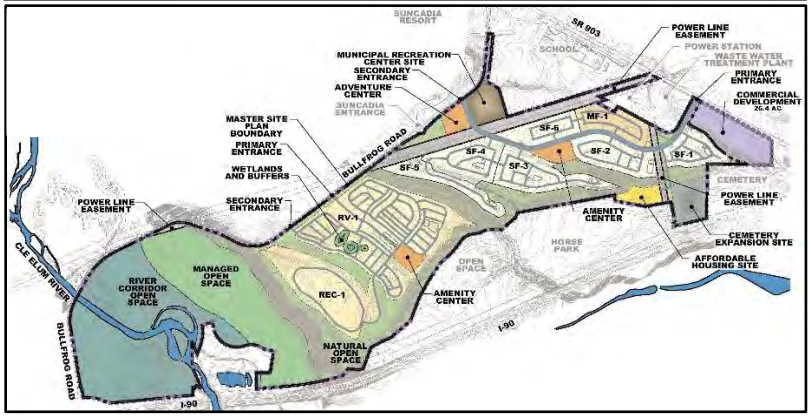




47° NORTH

Proposed Master Site Plan Amendment

Final Supplemental Environmental Impact Statement

Prepared by

April 16, 2021

City of Cle Elum
119 West First Street
Cle Elum, WA 98922

Phone: (509) 674-2262
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April 16, 2021

Dear Affected Agencies, Tribes, Organizations, and Interested Parties:

The following document is the Final Supplemental Environmental Impact Statement (Final SEIS or FSEIS) for the proposed **47º North Master Site Plan Amendment**. The proposal includes development of the 824-acre site with 707 residential units and 627 recreational vehicle sites, and public and private recreational amenities; more than one-half the site would be retained as open space. A 25-acre commercial site is also evaluated in the FSEIS but is not part of the 47º North proposal. The Draft SEIS (DSEIS) was issued on September 18, 2020. The DSEIS and FSEIS evaluate the probable significant impacts of two SEIS Alternatives and identify measures to mitigate identified impacts. The FSEIS responds to the comments received on the DSEIS and contains new information and analysis on certain topics. Together, the DSEIS and FSEIS constitute the SEIS, which supplements the EIS published in 2002 for the Cle Elum Urban Growth Area (UGA) (also referred to as the Bullfrog Flats Master Site Plan).

A 45-day public comment period was provided on the DSEIS. A total of 110 written comment letters/emails were received,[1] eight phone messages were left on the dedicated phone line, and one spoken comment was made by an individual at the virtual public meeting.[2]

This FSEIS, which is published in one volume, includes the following chapters:

- **Chapter 1 –** a summary of the DSEIS and FSEIS;
- **Chapter 2 –** a detailed description of the Proposed Actions and Alternatives, including any changes to the proposal since publication of the DSEIS;
- **Chapter 3 –** responses to DSEIS comments on topic areas, and a summary of information and analyses that have been updated since the DSEIS;[3] and,

[1] Note that a couple of commenters submitted more than one letter, and several letters were signed by more than one individual. Also, two comment letters were received after the comment period ended; as a courtesy, these letters are included in this FSEIS.

[2] Most of the comments related to the municipal/community recreation center that is required in the Development Agreement for the 2002 Bullfrog Flats (now 47° North) Master Site Plan.

[3] Many comments that were received on the DSEIS identified common topics, and these are referred to as "topic areas" in this FSEIS. This approach is intended to reduce repetition and to provide a single comprehensive response to identical or similar comments that share a common theme. **Chapter 3** of the FSEIS lists the topic areas and provides collective responses to the substantive comments. Additional information and analyses were prepared to address some of the comments and are also summarized in **Chapter 3** under the applicable responses. Technical memos including the complete updated information/analysis are in the appendices to this FSEIS.

- **Chapter 4 –** all the comments that were received during the comment period, as well as the two comment letters received after the comment period ended.

Updated technical information and analyses were prepared for this FSEIS in the following areas: transportation; cultural resources; utilities; plants, animals, and wetlands; and fiscal conditions. The updated memos and reports are located in the appendices to the FSEIS on electronic files in the back cover of the document.

An electronic version of this FSEIS can be viewed or downloaded on the City's website using the following link: http://cityofcleelum.com/city-services/administrative-services/public-notices/proposed-47-north-project/ For further information or to request a thumb drive of the FSEIS, please contact Lucy Temple at: lucy@cityofcleelum.com or (509) 674-4097.

The proposal described in the SEIS is based on pre-application materials (included on the City's website) and additional information requested by the City and provided by the Applicant to meet the needs of environmental review. The formal 47° North application to revise the approved Master Site Plan is expected to be submitted to the City in late Spring 2021. The application for the project will be reviewed by the City of Cle Elum Development Review Team. The City Planner will prepare a Staff Report evaluating the consistency of the proposal with applicable policy and regulatory requirements. The SEPA Official will determine whether the submitted application addresses issues discussed in the SEIS. The Planning Commission, or possibly a hearing examiner, will hold an open record public hearing and will make a formal recommendation to the City Council. The recommendation will be to deny, approve, or approve with additional conditions or modifications, the application for modifications to the Master Site Plan. The City Council will hold a closed record public hearing and will make a decision on the application. The City Council will also consider a proposed Development Agreement.

Thank you for your interest in the **47° North Master Site Plan Amendment** project.

Sincerely,

Richard Weinman

Richard Weinman
Designated SEPA Official

FINAL SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT

for the

47º NORTH

Proposed Master Site Plan Amendment

City of Cle Elum

The Final Supplemental EIS (FSEIS and Final SEIS) for the ***47º North Proposed Master Site Plan Amendment*** has been prepared in compliance with the State Environmental Policy Act of 1971 (Chapter 43.21C, Revised Code of Washington) and the SEPA Rules, effective April 4, 1984, as amended (Chapter 197-11, Washington Administrative Code) and the City of Cle Elum Environmental Policy (CMC 15.28). Preparation of this FSEIS is the responsibility of City of Cle Elum. The City has determined that this document has been prepared in a responsible manner using appropriate methods and has directed the areas of research and analysis that were undertaken in preparation of this FSEIS. This document is not an authorization for an action, nor does it constitute a decision or a recommendation for an action; in its final form, it will accompany the *Proposed Actions* and will be considered in making the final decisions on the proposal.

Date of DSEIS Issuance ..... **September 18, 2020**

Date of FSEIS Issuance..... **April 16, 2021**

FACT SHEET

Name of Project	**47° North Master Site Plan Amendment**
Proponent	Sun Communities, Inc.
Location	The approximately 824-acre project site is located in the City of Cle Elum, generally bounded by I-90, Bullfrog Road, SR-903, and the city cemetery.
Environmental Review	In 2002, a State Environmental Policy Act (SEPA) Environmental Impact Statement was prepared for the approximately 1,100-acre Bullfrog Flats Urban Growth Area (UGA). The 47° North site occupies a portion of the Bullfrog Flats UGA. This Supplemental EIS (SEIS) supplements the 2002 Cle Elum UGA EIS. Per the SEPA Rules (WAC 197-11-405(4)), a SEIS is prepared if there are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts, or there is significant new information indicating, or on, a proposal's probable significant adverse impacts. This SEIS provides SEPA review for the proposed 47° North Master Site Plan Amendment.
Prior Approvals	The following approvals were granted in 2002 for the Bullfrog Flats Master Site Plan: • Cle Elum UGA annexation to the City; • Subarea Plan approval; • Planned Mixed Use (PMU) zoning final plan approval; • Master Site Plan approval; and • Development Agreement approval. The present proposal would modify the previously approved Master Site Plan and Development Agreement.
SEIS Alternatives	The SEIS evaluates the following alternatives: **SEIS Alternative 5 – Approved Bullfrog Flats Master Site Plan** (No Action Alternative): The approved Bullfrog Flats Master Site Plan, updated to incorporate current conditions and regulations. The approved project includes:

- 1,334 residential units;
- 524 acres of open space;
- Public and private recreation amenities;
- Dedication of several properties to the City; and,
- A 75-acre business park.

SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment: Revise the approved 2002 Bullfrog Flats Master Site Plan to allow development on 824 acres of the 1,100-acre property, including:

- 707 residential units;
- RV resort with 627 RV sites;
- 477 acres of open space;
- Public and private recreation amenities;
- Dedication of properties to the City; and,
- A 25-acre future commercial development (owned and operated by New Suncadia).

Lead Agency	City of Cle Elum
SEPA Responsible Official	**Richard Weinman, Designated SEPA Responsible Official** SEPAResponsibleOfficial@cityofcleelum.com
EIS Contact Person	**Lucy Temple, Planner** City of Cle Elum 119 First Street Cle Elum, WA 98922 Telephone: (509) 674-4097 Email: lucy@cityofcleelum.com
Required Approvals and/or Permits	Preliminary analysis indicates that the following approvals and/or permits may be required from agencies with jurisdiction[1] for development of either of the SEIS Alternatives. Additional permits/approvals may be identified during the review process associated with specific development projects.

[1] An agency with jurisdiction is "an agency with authority to approve, veto, or finance all or part of a nonexempt proposal (or part of a proposal)" (WAC 197-11-714(3)). Typically, this refers to a local, state, or federal agency with licensing or permitting approval responsibility concerning a project.

State of Washington

- Dept. of Natural Resources, Forest Practices Permit
- Dept. of Ecology, Construction Stormwater General Permit
- Dept. of Health, Group A Water System Approval
- Dept. of Transportation, Access Permits

Kittitas County

- Access Permits

City of Cle Elum

- Major Amendment to Bullfrog Flats Master Site Plan
- Planned Mixed Use Approval
- Revised or New Development Agreement Approval
- Binding Site Plan and/or Subdivision Approval
- Grading Permits
- Building Permits
- Mechanical, Electrical, and Plumbing Permits
- Utility Permits

SEIS Authors & Principal Contributors

EA Engineering, Science and Technology, Inc., PBC

- SEIS Project Manager, Primary Author: Summary; Project Description; Land Use/Relationship to Plans & Policies; Housing, Population & Employment; Aesthetics/Light & Glare; Parks & Recreation; and Public Services.

HLA Engineering

- City Engineer

Fehr & Peers

- City Transportation Consultant

ESM

- Civil Engineering, Water Resources, Utilities (Sewer, Water, Solid Waste), Visual Simulations

Associated Earth Sciences, Inc. (AESI)

- Earth, Groundwater

Raedeke Associates

- Plants & Animals

Landau Associates

- Air Quality/Greenhouse Gas Emissions, Noise

Cultural Resource Consultants (CRC)

- Cultural Resources

Transportation Engineering Northwest (TENW)

- Transportation

ECONorthwest

- Fiscal and Economic Conditions

Previous Environmental Documents

Under WAC 197-11-405(4), this SEIS supplements the 2002 Cle Elum UGA EIS. This SEIS, together with the 2002 Cle Elum UGA EIS, comprehensively address the environmental impacts of the Proposed Actions.

Location of Background Information

Background material and supporting documents are available at the offices of:

EA Engineering, Science and Technology, Inc., PBC
2200 Sixth Avenue, Suite 707
Seattle, WA 98121

City of Cle Elum
119 First Street
Cle Elum, WA 98922

Date of Issuance of DSEIS

September 18, 2020

Date of Issuance of FSEIS

April 16, 2021

Availability of this FSEIS

Notices of Availability of the Final SEIS have been distributed to agencies, organizations, and individuals noted on the Distribution List. The FSEIS can also be reviewed and downloaded from the City's website by following the link:
http://cityofcleelum.com/city-services/administrative-services/public-notices/proposed-47-north-project/

Printed versions of the FSEIS can be reviewed at:

- **City of Cle Elum City Hall**
  119 First Street
  Cle Elum, WA 98922

- **Cle Elum Public Library Branch**
  302 N Pennsylvania Avenue
  Cle Elum, WA 98922

USB drives may be purchased at City of Cle Elum for $7.00 per thumb drive, plus tax and postage (if mailed). Printed copies can be ordered for the cost of printing, which is estimated at $132, plus tax and postage.

TABLE OF CONTENTS

FACT SHEET

1. SUMMARY

1.1 Introduction 1-1
1.2 Proposed Action and SEIS Alternatives 1-2
1.3 Impacts 1-4
1.4 Mitigation Measures and Significant Unavoidable Impacts 1-17

2. DESCRIPTION OF PROPOSED ACTION(S) AND ALTERNATIVES

2.1 Introduction 2-2
2.2 Background 2-2
2.3 Applicant's Objectives 2-5
2.4 Key SEPA and SEIS Concepts 2-6
2.5 Existing Site Conditions
Existing Natural Environment 2-11
Existing Built Environment 2-13
Comprehensive Plan, Zoning, and Shoreline Designations 2-14
2.6 Proposed Actions & SEIS Alternatives
Alternative 6 – Revised Master Plan 2-15
No Action Alternative 2-43
2.7 Comparison of Alternatives 2-46
2.8 Benefits and Disadvantages of Deferring Project Implementation 2-48

3. TOPIC AREA RESPONSES / UPDATED INFORMATION & ANALYSIS

3-1 Parks & Recreation
3-1.1 2020 DSEIS 3-4
3-1.2 2021 FSEIS 3-4
3-1.2.1 Municipal/Community Recreation Center 3-4
3-1.2.2 Relationship to Washington State Horse Park 3-5
3-1.2.3 Impacts of RV Resort Visitors 3-6
3-2 Transportation
3-2.1 2020 DSEIS 3-8
3-2.2 2021 FSEIS 3-8
3-2.2.1 General Traffic/Congestion & Access Considerations 3-8
3-2.2.2 Existing Traffic Volumes 3-10
3-2.2.3 Level of Service Standards 3-10
3-2.2.4 Collision History 3-12

3-2.2.5 RV Resort Trip Generation 3-13
3-2.2.6 Other Project Trip Generation 3-14
3-2.2.7 Traffic Model Forecasting & 47º North Project Trip Distribution 3-15
3-2.2.8 47º North Access to Douglas Munro Boulevard 3-16
3-2.2.9 SR 903/47º North Connector Road Access 3-17
3-2.2.10 Connector Road Through the Site 3-18
3-2.2.11 Mitigation and Pro-Rata Share 3-19
3-3 Historic & Cultural Resources
3-3.1 2020 DSEIS 3-23
3-3.2 2021 FSEIS 3-23
3-3.2.1 Cultural Resources Analysis Methods & Assumptions 3-23
3-3.2.2 Cultural Resources Information & Mitigation 3-25
3-3.2.3 Protocols for Communication/Documentation 3-26
3-4 Utilities
3-4.1 2020 DSEIS 3-27
3-4.2 2021 FSEIS 3-27
3-4.2.1 Water & Sewer Demand 3-27
3-4.2.2 City Utility System Capacity 3-29
3-4.2.3 Solid Waste Facility Capacity 3-31
3-5 Public Services
3-5.1 2020 DSEIS 3-33
3-5.2 2021 FSEIS 3-33
3-5.2.1 Emergency Access 3-33
3-5.2.2 General Demand for Public Services 3-34
3-5.2.3 Impacts to Police Services 3-37
3-5.2.4 Fire Prevention 3-39
3-6 Plants, Animal, & Wetlands
3-6.1 2020 DSEIS 3-41
3-6.2 2021 FSEIS 3-41
3-6.2.1 Comprehensive Wildlife Survey 3-41
3-6.2.2 Regulated Species & Species/Habitats of Greatest Conservation Need 3-43
3-6.2.3 Wildlife Movement 3-46
3-6.2.4 Loss of Habitat & Wildlife/Human Interactions 3-47
3-6.2.5 Land Stewardship Plan 3-48
3-7 Fiscal & Economic Conditions
3-7.1 2020 DSEIS 3-50
3-7.2 2021 FSEIS 3-50
3-7.2.1 City of Cle Elum Police Department Costs 3-50
3-7.2.2 Costs/Revenues to the City of Cle Elum & Other Service Providers 3-52
3-7.2.3 Services & Infrastructure Funding 3-55

3-8 Aesthetics/Light & Glare
3-8.1 2020 DSEIS....3-58
3-8.2 2021 FSEIS....3-58
3.8.2.1 Views....3-58
3-9 Housing, Population, & Employment
3-9.1 2020 DSEIS....3-66
3-9.2 2021 FSEIS....3-66
3-9.2.1 Affordable Housing....3-66
3-10 Air Quality/Greenhouse Gas Emissions
3-10.1 2020 DSEIS....3-69
3-10.2 2021 FSEIS....3-69
3-10.2.1 CO_2 Emissions & Climate Change....3-69
3-11 Other Topics
3-11.1 Opinions About the Project....3-71
3-11.2 Coordination with the City of Roslyn....3-73
3-11.3 Ridge Settlement Agreement....3-73
3-11.4 Suncadia Resort Construction Rate....3-74
3-11.5 Impact Fees....3-74
3-11.6 Concurrency....3-75
3-11.7 General Adequacy of SEIS....3-76
3-11.8 Primary vs. Second/Vacation Homes....3-77

4. COMMENT LETTERS

5. ACRONYMNS & ABBREVIATIONS

6. REFERENCES

7. DISTRIBUTION LIST

APPENDICES

A. Transportation Analysis Addendum Memo
B. Updated Cultural Resources Report
C. Updated Supplemental Engineering Technical Report
D. Updated Plants, Animals, & Wildlife Memo
E. Updated Fiscal Conditions Memo

LIST OF TABLES

1-1 Impact Summary Matrix.....1-6
2-1 Land Use Summary – FEIS Alt. 5, SEIS Alt. 5, & SEIS Alt. 6..... 2-16
2-2 Single Family Housing – SEIS Alternative 6..... 2-20
2-3 Future Commercial Development Assumptions – SEIS Alternative 6..... 2-23
2-4 Housing & Recreational Building Design/Construction – SEIS Alt. 6..... 2-25
2-5 Future Commercial Building Design/Construction – SEIS Alternative 6..... 2-30
2-6 47° N Residential & RV Resort Phasing – SEIS Alternative 6..... 2-31
2-7 Future Commercial Development Phasing – SEIS Alternative 6..... 2-33
2-8 Open Space Areas – SEIS Alternative 6..... 2-33
2-9 Phasing Plan – FEIS Alternative 5/SEIS Alternative 5..... 2-45
3-1 Updated Single Family & RV Unit Water Demand - Alternative 6..... 3-29
3-2 Wastewater Treatment Facility Capacity Allocation..... 3-32
3-3 Police Department Calls to Sun Communities Resorts: 2015-2019..... 3-40
3-4 Species of Greatest Conservation Need..... 3-44
3-5 City of Cle Elum Cumulative Revenue & Cost Summary – SEIS Alternatives 5 & 6 (in $1,000s)..... 3-52
3-6 Affordable Housing – SEIS Alternative 6..... 3-65

LIST OF FIGURES

2-1 Regional Map..... 2-3
2-2 Vicinity Map..... 2-4
2-3 Existing Site Conditions..... 2-12
2-4 Original Bullfrog Flats Master Site Plan – FEIS Alternative 5..... 2-17
2-5 Approved Bullfrog Flats Master Site Plan – SEIS Alternative 5..... 2-18
2-6 Proposed 47° North Master Site Plan Amendment – SEIS Alternative 6..... 2-19
2-7 Commercial Development Conceptual Site Plan..... 2-24
2-8 Single Family Residential Design Examples..... 2-26
2-9 Multi-Family Residential Design Examples..... 2-27
2-10 Park Model RV Design Examples..... 2-28
2-11 Recreational Building Design Examples..... 2-29
2-12 Phasing Plan – SEIS Alternative 6..... 2-32
2-13 Parks and Trails Plan – SEIS Alternative 6..... 2-36
2-14 Road Cross Sections – SEIS Alternative 6..... 2-40
3-1 Viewshed Location Map..... 3-59
3-2 Viewpoint #6..... 3-60
3-3 Viewpoint #8..... 3-61
3-4 Viewpoint #9..... 3-62

Chapter 1
SUMMARY

CHAPTER 1
SUMMARY

1.1 INTRODUCTION

This chapter provides a summary of the Draft and Final Supplemental Environmental Impact Statements (Draft SEIS, DSEIS; Final SEIS, FSEIS) for the *47° North Proposed Master Site Plan Amendment*. The chapter briefly describes: the SEIS process; the SEIS Alternatives; compares the significant environmental impacts of the SEIS Alternatives to those of the preferred alternative in the 2002 Cle Elum Urban Growth Area (UGA) Final EIS; provides a high-level summary of the key impacts; and lists the mitigation measures and significant unavoidable adverse impacts of the proposal. Any changes to the information, analysis, and mitigation measures presented in **Chapter 1** since publication of the DSEIS are highlighted in grey.

Following DSEIS issuance, a 45-day public comment period was provided. A total of 110 written comment letters/emails were received,[1] eight phone messages were left on the dedicated phone line, and one spoken comment was made by an individual at the virtual public meeting. Most of the comments related to the municipal/community recreation center that is required in the Development Agreement for the 2002 Bullfrog Flats (now 47° North) Master Site Plan.

Please see **Chapter 2** of this FSEIS for a more detailed description of the Proposed Actions and Alternatives, including any changes to the proposal since publication of the DSEIS; **Chapter 3** for key topic area responses to the comments received on the DSEIS, and updated information and analysis;[2] and **Chapter 4** for all the comments that were received during the comment period (as well as two comment letters received after the comment period ended).

[1] Note that a couple of commenters submitted more than one letter, and several letters were signed by more than one individual. Also, two comment letters were received after the comment period; as a courtesy, these letters are included in this FSEIS.

[2] Many comments that were received on the DSEIS identified common topics, and these are referred to as "topic areas" in this FSEIS. This approach is intended to reduce repetition and to provide a single comprehensive response to identical or similar comments that share a common theme. **Chapter 3** of the FSEIS lists the key topic areas and provides collective responses to the substantive comments. Additional information and analyses were prepared to address some of the comments and are also summarized in **Chapter 3** under the applicable responses. Technical memos including the complete updated information/analysis are in the appendices to this FSEIS.

Bullfrog Flats is an approximately 1,100-acre property located in the southwestern portion of the City of Cle Elum, generally bounded by I-90, Bullfrog Road, SR-903, and the City cemetery. The property is currently owned by New Suncadia, LLC ("New Suncadia"). In 2002, the City approved a Subarea Plan, Master Site Plan, and Development Agreement for the property, and it was annexed to the City that same year. Sun Communities, the Applicant, is in the process of acquiring approximately 824 acres of the Bullfrog Flats property from New Suncadia and is proposing changes to the approved Master Site Plan. New Suncadia is retaining a portion of the property and intends, in the future, to possibly develop approximately 25 acres for commercial use.

The City of Cle Elum 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. Because of the proposed changes, and the time that has passed since the original EIS was published, the City determined that an SEIS should be prepared to update all aspects of the 2002 Cle Elum UGA EIS, as necessary, to reflect the changes that have occurred. Per the SEPA Rules (WAC 197-11-405(4)), an SEIS should be prepared if there are substantial changes to a proposal so that the proposal is likely to have significant adverse environmental impacts, or there is significant new information indicating, or on, a proposal's probable significant adverse impacts. This SEIS assesses the potential environmental impacts and required mitigation measures associated with the proposed amendments to the approved Master Site Plan. The SEIS also provides a basis for amending the approved Development Agreement (or preparing a new Development Agreement) and modifying or identifying conditions of approval and development standards, as appropriate.

1.2 SEIS ALTERNATIVES

Two alternatives have been identified for study in this SEIS: SEIS Alternative 5, the Approved Bullfrog Flats Master Site Plan (the No Action Alternative), and SEIS Alternative 6, the Proposed 47° North Master Site Plan Amendment (the Applicant's proposal). Both SEIS Alternatives are compared to FEIS Alternative 5, the Original Bullfrog Flats Master Site Plan from the 2002 Cle Elum UGA EIS to help show relative changes in impacts. SEIS Alternative 5 is essentially the same as FEIS Alternative 5, as the Master Site Plan was ultimately approved and conditioned by the City; it has also been updated to reflect current conditions and regulations. Further descriptions of the SEIS Alternatives are provided below; the SEIS Alternatives are described in detail in **Chapter 2** of this FSEIS.

SEIS Alternative 5 (No Action Alternative) *– Approved Bullfrog Flats Master Site Plan*

Under SEIS Alternative 5, the site would be developed with the following land uses in phases over a 30-year buildout period:

- Residential Uses – 1,334 residential units (810 single family units and 524 multi-family units);

- Parks/Trails – Pocket parks, ponds/lakes, and a trail system;
- Recreation Centers – Neighborhood clubhouse;[3]
- Open Space – 524 acres (49% of the site) of open space;
- Cemetery Expansion Site – A 10-acre site would be reserved for future expansion of the Laurel Hill Memorial Park cemetery;
- Affordable Housing Site – A 7.5-acre site would be required to be reserved and dedicated to the City for future development of affordable housing;
- Business Park/Commercial Uses – A 75-acre property would be developed with approximately 950,000 sq. ft. of business park use, potentially including: light industrial, research and development, warehousing, offices, and limited retail; and,
- School Expansion, Water Treatment Plant, Horse Park Sites – 222 acres reserved for school, utility, and recreational (Horse Park) uses were subsequently dedicated to various governmental entities and have been developed.

The above types and amounts of uses are largely the same as those under FEIS Alternative 5.

SEIS Alternative 5 serves as the "no action" alternative that is required by SEPA and compared to the proposal. According to the SEPA Rules, "no action" does not necessarily mean that nothing (no development) would occur on the site. This alternative is typically defined as what would most likely happen if the proposal did not occur (i.e., if the City took no action on the proposal). Given that there is an approved Master Site Plan and Development Agreement for the Bullfrog Flats project, the No Action Alternative studied in this SEIS represents development of that approved project, which could go forward, but updated to reflect current conditions and regulations.

SEIS Alternative 6 *– Proposed 47° North Master Site Plan Amendment*

SEIS Alternative 6 represents the Applicant's proposed amendment to the approved Bullfrog Flats Master Site Plan. The 824-acre 47° North site and 25-acre adjacent property would be developed in the following land uses in phases over a 17-year buildout period (the residential and recreational uses would buildout over 7 years and the future commercial uses on the adjacent property could buildout over 17 years):

- Residential Uses – 707 residential units (527 single family units, 180 multi-family units;
- RV Resort – 627 RV sites;
- Parks/Trails – Two private community parks and three public trail parks, and a 6-mile trail/sidewalk system;

[3] Since publication of the DSEIS, a 12-acre site on the 47° North property was dedicated to the City for a future municipal (community) recreation center.

- Recreation Centers – A 6-acre adventure center open to residents and the public; and two private recreational amenity centers totaling 11 acres;[4]
- Open Space – 477 acres of open space (58% of the site);
- Cemetery Expansion Site – A 13-acre site reserved for future expansion of the Laurel Hill Memorial Park cemetery, to be dedicated to the City;
- Affordable Housing Site – A 6.8-acre site reserved and dedicated to the City for future construction of affordable housing by others; and,
- Commercial Uses – A 25-acre contiguous property that is not part of the 47º North Master Site Plan that could be developed in the future with 150,000 sq. ft. of commercial uses, potentially including: grocery store, retail, restaurant, and medical office uses.

The types and amounts of land uses would differ from those under FEIS and SEIS Alternative 5.

1.3 IMPACTS

This section initially includes a summary of the key impacts that would potentially result from construction and operation of SEIS Alternatives 5 and 6**.** Following the key impacts discussion is **Table 1-1**, which provides greater detail on the significant impacts of the SEIS Alternatives. The key impacts discussion and summary table are not intended to be a substitute for the complete discussion of each element that is contained in **Chapter 3** of the Draft SEIS and of this FSEIS and should not be relied on by readers to make judgements about the completeness or sufficiency of the discussion in the DSEIS/FSEIS. Note that FEIS Alternative 5 is not included in **Table 1-1** as the differences between this alternative and SEIS Alternative 5 are negligible.

Summary of Key Impacts

Construction and operation of SEIS Alternatives 5 and 6 would result in impacts to the natural and built environment, similar to other large, mixed-use developments in urban areas. The impacts of SEIS Alternative 5 would be almost identical to those described under FEIS Alternative 5 in the 2002 Cle Elum UGA EIS because the mix and layout of uses and the buildout period would be nearly the same. However, the impacts under SEIS Alternative 5 would be somewhat less due to adherence to current, typically more stringent regulations. In general and overall, the impacts of SEIS Alternative 6 would be less than those for FEIS and SEIS Alternative 5 because the buildout period would be shorter; most of the residential units would be manufactured offsite and assembled onsite; there would be fewer

[4] Ibid., 3.

residential units and smaller permanent population; there would be less commercial development; and, a greater percentage of the site (although fewer acres) would be preserved in open space.

Major issues raised repeatedly in SEIS Scoping and DSEIS comments emphasized potential impacts of proposed development on the natural environment; rural character/scenic experience; public infrastructure, services, and facilities; and economic and fiscal conditions. The conclusions of the DSEIS and FSEIS analyses on these topics for SEIS Alternative 6 are highlighted below; impact comparisons are relative to SEIS Alternative 5.

Natural Environment

SEIS Alternative 6 would result in:

- substantial but less clearing and grading and associated potential for erosion and sedimentation;
- no significant impacts to geologic hazards, mostly because development would be located outside of these areas (similar to SEIS Alternative 5)
- substantial but 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;
- adequate water supply through existing water rights to serve the project (similar to SEIS Alternative 5); and,
- a larger percentage of the site maintained in open space.

Rural Character/Scenic Experience

SEIS Alternative 6 would result in:

- conversion of a vacant, largely forested site to urban mixed-use development, consistent with its location in the Cle Elum UGA and its mixed-use zoning (similar to SEIS Alternative 5);
- less residential and commercial development/lower density;
- development of an RV resort;
- construction activities that could be visible or noticeable from surrounding roadways but would occur over a shorter buildout period;
- no significant land use conflicts due to the proposed layout of land uses, proposed open space and buffers incorporated into the site plans, and existing physical barriers within and adjacent to the site (similar to SEIS Alternative 5);
- views of on-site development and visual change that would be limited or blocked by preserved vegetation, topography, and distance to development (similar to SEIS Alternative 5);

- fewer new light sources occurring onsite due to less permanent development; however, the RV resort would be a source of light, particularly during the peak visitor season; 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 5).

Public Infrastructure, Services, & Facilities

SEIS Alternative 6 would result in:

- substantial but less additional permanent population, plus temporary population from the RV resort;
- less demand for public services (police, fire/EMS, emergency dispatch, hospitals, and schools) due primarily to less permanent population; the RV visitor population and second/vacation homes would not impact schools;
- fewer 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 (similar to SEIS Alternative 5); and,
- less demand for water, sewer, and solid waste services due to less development and the type of development (including the RV resort and second/vacation homes).

Economic & Fiscal Conditions

SEIS Alternative 6 would result in:

- fewer local construction jobs due to fewer residential units and the manufacturing of homes off-site;
- fewer new permanent employees at full buildout due to the smaller commercial space on the adjacent property;
- revenues that would exceed costs for the City of Cle Elum at buildout; however, fiscal surpluses in the City would be lower; small fiscal shortfalls would occur in earlier years for the possible commercial development and fiscal shortfalls would occur post buildout for the RV resort and residential development;
- costs to Hospital District No. 2 and KITTCOM that would be slightly higher due to timing variations of development and when additional employees would be needed; and,
- less revenue generated for the School District, but also lower staffing costs due to fewer residents and students.

Table 1-1 summarizes the impacts of the alternatives in greater detail.

Table 1-1
IMPACT SUMMARY TABLE

SEIS Alternative 5	SEIS Alternative 6
3.1 EARTH	
• 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. • Potential construction impacts (e.g., erosion and sedimentation) could occur from site preparation, structural fill placement, and foundations construction. • All of the on-site areas classified as erosion, steep slope, and landslide hazard areas would be located outside of the areas proposed for development. The risk of liquefaction within the proposed development area during seismic events, as well as the risk of coal mine hazard and subsidence of underground mine workings is considered low.	• 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. • Potential construction impacts could occur but would be less due to less proposed development onsite. • Impacts to geotechnical hazards (erosion, steep slope, landslide, seismic, and coal mine) would be similar.
3.2 WATER QUANTITY & QUALITY	
• No direct construction impacts to water resources are anticipated; however, a new wetland was identified subsequent to the 2002 Cle Elum UGA EIS, and the Master Site Plan for SEIS Alternative 5 would impact the new wetland. • 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 such as concrete leachate to the Cle Elum River by way of the underlying alluvial aquifer. • A permanent stormwater management system would be installed onsite and significant impacts to surface water resources are not anticipated. Infiltration would be the primary form of stormwater management; potential water quality impacts to groundwater would also be mitigated by incorporating water quality	• No direct construction impacts to water resources are anticipated under SEIS Alternative 6, including to the new wetland. • The potential for erosion and sedimentation, and other pollution of surface waters would be less because there would be less clearing and development onsite, and development would include temporary stormwater management that would comply with current regulations. • Like SEIS Alternative 5, a permanent stormwater management system would be installed that would comply with current regulations. Also, like SEIS Alternative 5, infiltration would be the primary form of stormwater management. A water balance analysis determined that the project would not impact groundwater quantity. Potential water quality impacts to groundwater

SEIS Alternative 5	SEIS Alternative 6
treatment into the stormwater management system. • Sufficient water rights are now available to serve SEIS Alternative 5, as well as full buildout of Suncadia, and significant impacts to water supply are not anticipated.	would be mitigated by infiltration of stormwater and water quality treatment. • Like SEIS Alternative 5, sufficient water rights are available to serve SEIS Alternative 6 and Suncadia. However, there would be fewer residential units and commercial development that would result in less domestic water use.
3.3 PLANTS, ANIMALS, & WETLANDS	
• A total of 524 acres (48% of the site) would be retained in largely forested open space under SEIS Alternative 5 • SEIS Alternative 5 would reduce the vegetation onsite which would case fragmentation, alteration, and removal of wildlife habitat. • Subsequent to the 2002 Cle Elem UGA EIS, a new wetland was identified (Wetland 6). Development under SEIS Alternative 5 would impact Wetland 6 and its buffer. • Stormwater runoff would be collected and treated in accordance with applicable regulations and no impacts to fish or fish habitat in the Cle Elum or Yakima Rivers are expected. • SEIS Alternative 5 would convert existing forest areas to urban uses but a large portion of the site would be maintained in open space (48% of the site), including along the Cle Elum River corridor. No impacts to threatened, endangered, or sensitive plants are anticipated. • SEIS Alternative 5 would result in the displacement of wildlife and wildlife habitat within the development areas. Development would not substantially affect threatened, endangered, or sensitive wildlife species. Priority species, such as elk, could be minimally impacted.	• 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 essentially the same vegetation reduction and associated habitat impacts. • SEIS Alternative 6 would result in no direct impacts to wetlands and their buffers. • Like SEIS Alternative 5, stormwater would be collected and treated in accordance with current regulations and no fish or fish habitat impacts are expected. • SEIS Alternative 6 would convert forest areas to urban uses but would maintain a larger percentage of the site in open space (58% of the site), including along the river corridor. No impacts to endangered, threatened, or sensitive plants are anticipated. • Like SEIS Alternative 5, SEIS Alternative 6 would result in displacement of wildlife and habitat, but would not substantially affect endangered, threatened, or sensitive wildlife species. Priority species, such as elk, could be minimally impacted.
3.4 AIR QUALITY	
• Demolition and construction under SEIS Alternative 5 would generate dust and emissions from construction activities. Construction would comply with applicable regulations but could still	• SEIS Alternative 6 would result in dust and emissions, but at a reduced level due to fewer residential units, a shorter buildout period (7 years for 47° North, and 17 years for the adjacent

SEIS Alternative 5	SEIS Alternative 6
cause temporary localized impacts over the 30-year buildout. • Operational air quality impacts under SEIS Alternative 5 would occur from transportation-related sources, heating, and wood-burning. Tailpipe emissions would be the major source of air pollutants. However, since the site is located in an attainment area for criteria pollutants, it is unlikely that localized air pollutant concentrations could cause a hot spot or result in significant impacts. • SEIS Alternative 5 would generate approximately 44,753 metric tons of CO_2e per year by 2037 and 72,368 metric tons of CO_2e 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.	commercial development), and construction of manufactured homes offsite. • Operational air quality emissions would be generated by similar sources as under SEIS Alternative 5. Tailpipe emissions would be the major source of air pollutants but are anticipated to be less. • SEIS Alternative 6 is anticipated to generate less GHG emissions, 35,719 metric tons of CO_2e per year by 2037, and would represent a slightly smaller percentage of statewide annual GHG emissions.
3.5 NOISE	
• Construction activities under SEIS Alternative 5 would result in temporary increases in noise from equipment and vehicle traffic and could result in temporary localized impacts to adjacent land uses. • The primary source of operational noise under SEIS Alternative 5 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. • Increases in noise would also occur from additional residential and commercial uses; noise from these uses would be regulated by the Cle Elum Municipal Code and state regulations.	• Construction noise and its associated impacts on adjacent land uses under SEIS Alternative 6 would be less due to less proposed development and construction of manufactured homes occurring offsite. • Like SEIS Alternative 5, vehicle traffic would be the primary source of noise under SEIS Alternative 6; the differences in modeled noise under SEIS Alternative 6 would be negligible. • Increases in noise from residential and commercial uses would be less due to less proposed development. RV uses would generate noise during the peak visitor season. Operational noise would be regulated by the City code and state regulations.

SEIS Alternative 5	SEIS Alternative 6
3.6 LAND USE	
• SEIS Alternative 5 would convert the existing undeveloped, largely forested site to a mix of urban uses, including residential, business park/ commercial, recreational, and public facilities.	• SEIS Alternative 6 would convert the site to a mix of urban uses but would feature less residential and commercial development and would also include an RV resort.
• Development would result in a transition to a mix of higher intensity urban land use, consistent with the site's location in a UGA. Residential density on the site under SEIS Alternative 5 would be 6.0 DU/acre.	• Development would convert the site to higher intensity urban uses. Residential density under SEIS Alternative 6 would be less, at 4.9 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.	• Like 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.
• Increases in activity levels would occur under SEIS Alternative 5 due to the increased population on the site.	• Increases in activity levels would occur but would generally be less due to a smaller permanent residential population. However, there would be increased seasonal activity from the proposed RV resort.
• New residents under SEIS Alternative 5 would create additional demand for goods and services which could indirectly cause pressure for commercial development. Cumulative development in the area, together with development under SEIS Alternative 5, would increase the total developed area and associated housing/population, and represent a conversion and intensification of land use in the area.	• A smaller permanent resident population would generate less demand for goods and services and create less indirect pressure for commercial development; potential commercial development on the adjacent site would also reduce any pressure. However, seasonal population from the RV resort would increase total demand. Cumulative development in the area, together with development under SEIS Alternative 6, would increase the total developed area and associated housing/population, and represent an intensification of land use in the area.
3.7 RELATIONSHIP TO PLANS & POLICIES	
• 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., Town of Roslyn, Community of Ronald, and City of South Cle Elum) plans, policies, and regulations.	• Similar to SEIS Alternative 5, 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.

SEIS Alternative 5	SEIS Alternative 6
3.8 AESTHETICS/LIGHT & GLARE	
• Construction activities under SEIS Alternative 5 could be visible from locations along Bullfrog Road and SR 903. However, most clearing and grading work would occur behind the site perimeter buffer and would be blocked from view. • 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.	• Construction activities could be visible from surrounding roadways but would occur over a shorter buildout period and with less development. Similar perimeter buffer would be preserved. • Visual simulations were prepared to illustrate proposed development under SEIS Alternative 6. Although development would convert the primarily forested area to residential neighborhoods, an RV resort, and commercial uses, the proposed site layout, preserved vegetated buffers, existing landforms, and distance to development would avoid or minimize visual impacts from surrounding areas. • New light sources would occur on the site but would be less due to less development. However, light and glare would also be generated by the RV resort, particularly during the peak visitor season. Vegetated buffers and other mitigation would minimize lighting impacts.
3.9 HOUSING, POPULATION, & EMPLOYMENT	
• 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. The largest demand for construction workers would occur during the first five years of construction. • Under SEIS Alternative 5, the following approximate housing, population, and employment would be generated by buildout in 2051: – 1,334 housing units – 2,809 permanent residents – 1,900 employees The housing and population would help the City meet its growth targets which are not caps and may understate anticipated growth.	• Demand for local construction workers would be less under Alternative 6 because there would be less development onsite and manufactured housing would be constructed offsite and assembled onsite. • Under SEIS Alternative 6, the following approximate housing, population, and employment would be generated by buildout in 2037: – 707 housing units – 1,489 residents – 409 employees The housing and population would help the City meet its growth targets. The RV resort would include 627 RV sites with an equivalent/proxy population (used to estimate approximate

SEIS Alternative 5	SEIS Alternative 6
• 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.	service demand) of about 941 that would not count toward the City's growth targets. • An approximate 6.8-acre site would be set aside for future affordable housing. Preliminary estimates of the monthly mortgage payment and land lease costs for the single family housing and monthly rental rates for the multi-family housing indicate that they would not be considered affordable to city/county residents earning 60% of Median Household Income. However, the housing is intended to be financially accessible for both local and public service employees.
3.10 HISTORIC & CULTURAL RESOURCES	
• Unidentified cultural resources could potentially be inadvertently impacted or destroyed with site development under SEIS Alternative 5. 23 cultural resource sites were identified in the project area in the 2002 Cle Elum UGA EIS. Most of the sites were 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. • 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).	• Like SEIS Alternative 5, unidentified cultural resources could be impacted or destroyed with site development under SEIS Alternative 6. However, similar areas would be reserved in open space. • Like SEIS Alternative 5, potential impacts to cultural resources are not expected to be significant because known archaeological sites that are located onsite have since be determined to be not eligible for listing on the NRHP or WHR.
3.11 PARKS & RECREATION	
• During development of SEIS Alternative 5, construction workers could choose to live in local RV campgrounds which would affect the number of sites available for recreational users. • 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.	• Any potential for construction workers to live in local RV campgrounds would be less due to less development overall and less on-site construction. • Demand for parks and recreation facilities would be less due to fewer permanent residents; visitors to the RV resort would also contribute to increased demand, but demand would still be lower than under SEIS Alternative 5 because the RVs would not generate permanent population. A range of recreational facilities would be provided onsite, including: parks, trails, an

SEIS Alternative 5	SEIS Alternative 6
	adventure center, and two recreation amenity centers. These facilities would generally be consistent with goals and policies in the City Parks and Recreation Plan and would meet or exceed the Plan's targets.
3.12 PUBLIC SERVICES	
• Development under SEIS Alternative 5 and its associated population would generate demand for public services (i.e., police, fire/emergency medical, medical dispatch, hospital, and school services) 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 population[5]: – 6.7 police officers (City Police Dept.) – 3.1 paid full-time firefighters (City Fire Dept.) – 6.0 EMTs and 7.4 paramedics (Hospital Dist. No. 2 Medic 1) – 0.7 physicians, 5.4 APCs, and 4.0 RN (Hospital Dist. No. 2 clinics in Cle Elum) – 1.0 physicians, 0.2 APCs, and 6.1 RNs (Hospital Dist. No. 1 in Ellensburg) – 0.9 dispatchers (KITTCOM) – 22.9 teachers based on 334 additional students (Cle Elum – Roslyn School Dist.) Based on the Police Dept. ICMA method, 12 police officers would be required.	• SEIS Alternative 6 would generate less demand for public services due to fewer permanent residents, less commercial development, and a shorter buildout period. The RV visitors would also generate some demand for public services; however, the visitors would not impact schools. • 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[6]: – 5.5 police officers (City Police Dept.) – 2.8 paid full-time firefighters (City Fire Dept.) – 5.2 EMTs and 6.4 paramedics (Hospital Dist. No. 2 Medic 1) – 0.6 physicians, 4.6 APCs, and 3.5 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) – 12.1 teachers based on 177 additional students (Cle Elum – Roslyn School Dist.) Based on the Police Dept. ICMA method, 8 police officers would be required.
3.13 TRANSPORTATION	
• 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 increase traffic volumes and congestion on area roadways (e.g., in the City, County, and on state facilities such as SR	• SEIS Alternative 6 would result in temporary construction-related traffic impacts over the 17-year buildout period. Based on estimated grading, approximately 200 trips per month would be generated to haul grading materials. • Like SEIS Alternatives 5, SEIS Alternative 6 would increase traffic volumes and congestion on area roadways.

[5] Assumes that all the residential units are primary homes.
[6] Ibid., 5.

SEIS Alternative 5	SEIS Alternative 6
903, SR 907, and I-90); 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 conditions, and continue to operate at non-compliant LOS with SEIS Alternative 5: – #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 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 5: – #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) – #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 Additional study intersections are expected to operate at non-compliant LOS during the Friday and Sunday summer PM peak hour as a result of project traffic. • Increased traffic volumes on area roadways from SEIS Alternative 5 could result in moderate increases in accident rates; however, none of the study intersections were identified as high accident locations.	• 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: – #1 - Bullfrog Road / I 90 EB Ramps – #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) – #15 - N Oakes Ave / W 2nd Street (SR 903) – #21 - Pennsylvania Ave / N 1st Street (SR 903) in Roslyn – #30 - SR 903 / Site Access Connector Road Additional study intersections are expected to operate at non-compliant LOS during the Friday and Sunday summer PM peak hour as a result of project traffic. • Like SEIS Alternative 5, traffic volumes on area roadways due to SEIS Alternative 6 could result in moderate increases in accident rates.

SEIS Alternative 5	SEIS Alternative 6
• New trails and sidewalks would be provided throughout the site and would connect with off-site trails.	• An approximately 6-mile network of non-motorized trails and sidewalks would be provided throughout the site that would connect with off-site trails.
3.14 UTILITIES	
• SEIS EIS Alternative 5 would generate demand for water, sewer, and solid waste service during construction and operation of the project. The City of Cle Elum would provide water and sewer service, Waste Management of Ellensburg would provide solid waste service. • Solid waste would be generated during construction of SEIS Alternative 5. • At buildout under SEIS Alternative 5, 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: – New filtration train in the Water Treatment Plant – 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 under SEIS Alternative 5. The City Wastewater Treatment Plant (WWTP) has adequate capacity to serve the project. • SEIS Alternative 5 is estimated to generate approximately 2,885 tons of solid waste per year at buildout. Improvements to the Cle Elum Transfer Station could be required to increase the station's capacity and serve the project. However, Kittitas County Solid Waste has not identified any plans to improve the transfer station/build a new transfer station, and the current property owner has been making payments for transfer station improvements.	• SEIS Alternative 6 would generate demand for water, sewer and solid waste service during construction and operation; the same entities would provide service. • Solid waste generated during construction of SEIS Alternative 6 would be less due to less on-site construction and less overall population. • At buildout under SEIS Alternative 6, average daily treated water demand would range from 0.16 to 0.31 MGD. The same improvements to the City Water System would be required as under SEIS Alternative 5. • At buildout, monthly wastewater flow would range from 0.19 to 0.21 MGD under SEIS Alternative 6. Like SEIS Alternative 5, the City WWTP has adequate capacity to serve the project. • SEIS Alternative 6 would generate approximately 2,335 tons of solid waste per year at buildout. Like SEIS Alternative 5, improvements to the Cle Elum Transfer Station could be required to increase the station's capacity and serve the project.

SEIS Alternative 5	SEIS Alternative 6
3.15 FISCAL & ECONOMIC CONDITIONS	
• SEIS Alternative 5 is anticipated to create demand for approximately 2,025 local construction jobs over full buildout.	• SEIS Alternative 6 would create demand for approximately 607 local construction jobs, which is less due to fewer residential units and the manufacturing of homes offsite.
• Operational economic impacts of SEIS Alternative 5 would include increased employment opportunities, higher potential personal income, lower unemployment, and new business commerce.	• Operational economic impacts under SEIS Alternative 6 would be similar to under SEIS Alternative 5 and are expected to be positive. Increased site population would result in increased retail spending but would be less due to fewer permanent residents. Future commercial development on the adjacent 25-acre site could also provide new offerings that could compete with existing businesses.
• Development of SEIS Alternative 5 commercial (business park) uses would increase permanent employment by approximately 1,900 new employees at full buildout.	• Development of SEIS Alternative 6 (including future commercial development) would result in approximately 400 new permanent employees at full buildout.
• SEIS Alternative 5 would generate revenues to the City of Cle Elum that would exceed costs (including for police, fire, parks, and public works services), which would create fiscal surpluses for the City over the course of the project and at full buildout.	• SEIS Alternative 6 would generate revenues to the City that would exceed costs, but fiscal surpluses would be lower than SEIS Alternative 5. The SEIS Alternative 6 possible commercial development could generate small fiscal shortfalls in earlier years while the SEIS Alternative 6 residential and RV resort could generate fiscal shortfalls post buildout.
• Costs to provide police service would be greater using the ICMA method than using to officer/population method.	• Similar to SEIS Alternative 5, costs to provide police service would be greater using the ICMA method.
• The public service purveyors' (e.g., Hospital District No. 2, KITTCOM, and Cle Elum-Roslyn School District) costs could exceed revenues to serve SEIS Alternative 5; however, mitigation may or may not be required, as the purveyors have a number of funding sources. Individual mitigation agreements with the public service purveyors could be executed.	• Costs to Hospital District No. 2 and KITTCOM under SEIS Alternative 6 would be slightly higher than under SEIS Alternative 5 due to timing variations of development and when additional employees would be needed. SEIS Alternative 6 would generate less revenue for the School District due to less development but would also generate lower staffing costs due to fewer residents onsite. Similar to SEIS Alternative 5, mitigation may or may not be required, as the purveyors have a number of funding sources. Mitigation agreements could also be executed.

1.4 MITIGATION MEASURES & SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS

The following section lists the mitigation measures that were identified in the DSEIS and FSEIS to address the significant adverse impacts of the SEIS Alternatives. Where significant impacts from construction and operation of the SEIS Alternatives cannot be mitigated by known mitigation measures, significant unavoidable adverse impacts are noted. The mitigation measures are separated into several categories, as described below.

- **Proposed Mitigation Measures (Included in the Project)** are measures which the Applicant has preliminary proposed, that are included in the proposed Master Site Plan in the pre-application materials submitted to the City, and that are above and beyond the "Required Mitigation Measures" described below. These measures include certain conditions of approval from the 2002 Bullfrog Flats Development Agreement. The conditions in the Development Agreement were developed to mitigate the environmental impacts of the Bullfrog Flats Master Site Plan and arose from the 2002 Cle Elum UGA Final EIS and various other approval processes for the project. Because of the time that has passed since the Development Agreement was executed, and the lack of complete documentation, the reasons 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 the conditions of approval that pertain to the current proposal, and which the Applicant has preliminarily agreed to include in the project, are listed with appropriate modifications. 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 represented with the verb "should" in this FSEIS to indicate a condition recommended by the City.

- **Required Mitigation Measures** are measures required by code, laws, or local, state, and federal regulations.

- **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. These are the conditions that are not certain to apply to SEIS Alternative 6 and will depend on changes to the adopted Development Agreement that may be proposed. 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 represented with the verb "should" in this FSEIS 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 the impacts of SEIS Alternative 6.

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

Earth

Required Mitigation Measures

Structural Standards

- The Cle Elum Municipal Code includes performance standards for development in geologically hazardous areas (CEMC 18.01.070 (F)) that would be followed for development on the 47º North site. These standards include the following:
  - Structures and improvements shall minimize alterations to the natural contour of the slope, and foundations shall be tiered where possible to conform to the existing topography;
  - Structures and improvements shall be located to preserve the most critical portion of the site and its natural landforms and vegetation;
  - The proposed development shall not result in greater risk or a need for increased buffers on neighboring properties; and,
  - Development shall be designed to minimize impervious surfaces within the critical area and critical area buffer.

Erosion Hazards

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

- During construction, monitoring of erosion and sediment control by a Certified Erosion and Sediment Control Lead would be required for the project by Ecology.

Landslide Hazards

- Foundation setbacks for buildings and other structures would comply with criteria established in Section 1808.7 of the 2015 *International Building Code* (IBC), including:
  - For foundations located adjacent to the top of steep (> 33.3%) slopes, the face of the foundations would be set back from the steep slope a distance equal to or greater than the lesser of 40 feet of H/3 where "H" is equal to the height of the steep slope; and,
  - For structures located adjacent to the toe of a steep (> 33.3%) slopes, the face of the structures would be set back from the toe of the steep slope a distance equal to or greater than the lesser of 15 feet or H/2 where "H" is equal to the height of the steep slope.

- Placement of structural fill would be avoided on or adjacent to the top of steep (greater) than 40% slopes.

- Permanent cut or fill slopes would not exceed a maximum inclination of 50%.

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

Other Possible Mitigation Measures

Coal Mine Hazards

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

- Use flexible pipes, couplings, and fittings for underground utilities.

Significant Unavoidable Adverse Impacts

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

Water Quantity & Quality

Proposed Mitigation Measures (Included in the Project)

- Proposed development under the revised Master Site Plan should not directly impact any on or off-site water resources (e.g., wetlands and streams). No mitigation is warranted.

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.

Required Mitigation Measures

- Temporary stormwater management measures would be implemented that would follow the BMPs and requirements of the Construction SWPPP and the currently active National Pollutant Discharge Elimination System (NPDES) Permit (No. WA0052361) for the project.

- A Master Drainage Plan would be prepared and implemented, consistent with the 2019 Ecology Manual.

- Stormwater Infiltration facilities would be sited to avoid increasing the potential for landslides in any steep slope or landslide hazard areas.

- Design-level exploration and infiltration testing would be performed for the proposed infiltration ponds to assess suitable infiltration rates for infiltration facility design, as described in the 2019 Ecology Manual.

Significant Unavoidable Adverse Impacts

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

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

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

Plants, Animals, & Wetlands

Proposed Mitigation Measures (Included in the Project)

- No direct impacts to wetlands or the Cle Elum River should occur. The riparian wetlands along the Cle Elum River should be retained within dedicated open space that would encompass their required buffers and the entire river corridor, as well as additional forest habitat. Isolated Wetlands 4, 5, and 6 and their buffers should be retained in an open space tract.

- Conservation easements that were granted for the Managed Open Space and River Corridor Open Space onsite by Trendwest to the Kittitas Conservation Trust should remain in effect with the proposed project.

- The proposed landscaping onsite should generally consist of natural, local, and drought tolerant plants, including hydroseed mixes that could include wildflowers, but not any plants considered to be noxious weeds – a Noxious Weed Plan should be prepared to ensure that such plants are not planted. Imported soil materials should also be weed-free. The use of native plant material could benefit wildlife.

Bullfrog Flats Conditions of Approval (Included in the Project)

- With respect to overall fish and wildlife habitat, the project should include 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. This could include the City of Cle Elum enforcing use and access restrictions in designated areas, especially within the Cle Elum River open space, to minimize disturbance to fish and wildlife during mating and breeding seasons.

Required Mitigation Measures

- The 47° North project would adhere to the City of Cle Elum critical areas ordinance and Shoreline Master Program regulations regarding avoidance and minimization of impacts, as well as buffer requirements and protection of fish and wildlife habitat conservation areas.

- Construction limits, including staging areas, would be clearly marked in the field prior to beginning construction activities.

- The limits of wetland buffer areas would be clearly marked on construction plans and in the field to prevent unauthorized damage to critical areas during construction.

- Construction staging areas would be located outside of wetland buffers within the RV resort area to minimize impacts to vegetation.

- Any wetland buffer areas temporarily disturbed for construction access and staging would be revegetated with a mixture of native plant species following completion of construction activities, pursuant to an approved mitigation plan.

- Vehicle re-fueling and maintenance activities would be avoided within wetland buffers, or within at least 100 feet of wetlands.

- Appropriate BMPs and TESC measures would be implemented in accordance with an approved SWPPP, consistent with standards of the 2019 Ecology Manual, including specific measures to prevent and control spills of pollutants, and to handle, control, and store potential contaminants and their potential to damage surface waters and fisheries resources.

- A permanent stormwater management system would be designed and installed consistent with the 2019 Ecology Manual and applicable City of Cle Elum development

regulations in place at the time of permitting for project. Operation of this system would avoid and minimize the potential for impacts on surface waters and fisheries resources.

- As necessary, clean stormwater runoff would be directed to the wetland's catchment area to retain the wetland hydrology.

Other Possible Mitigation Measures

- Where feasible, conservation easements could be conveyed to additional large forested open space areas across the site – beyond those associated with the Cle Elum River corridor – which would enable these areas to be managed for healthy forests and wildlife habitat in coordination with recreational uses.

- To address impacts of increased angler fishing pressure on fisheries resources and habitat, WDFW is expected to continue to manage the regional fishery. They would continue to monitor fishing in the Cle Elum and Yakima Rivers and evaluate local fish populations. If problems were identified, the WDFW would likely implement selective gear rules in affected areas. If fish populations continued to decline, WDFW could apply catch and release regulations in additional areas, narrow the fishing season, or as a last resort enact closures.

- To mitigate impacts of increased fishing pressure on fisheries resources with proposed development, the Applicant could: 1) explore angler management options with the WDFW and Yakama Nation, such as increased angler education, dispersing angling pressure to underused areas, and providing alternatives to traditional fishing opportunities; 2) implement creel surveys (coordinated with WDFW) to address issues directly related to angler fishing presence; and/or 3) implement fish population surveys (coordinated with WDFW to assess quantitative changes in discrete stream reaches).

- Hiking trails could be located outside the Cle Elum River corridor so that elk viewing would be possible without traversing the elk habitat. Elk viewing areas could be established.

- Bear-proof garbage receptacles, well-signed natural areas, informational signage about the risks associated with living near natural areas, well-marked common road crossings, well-marked speed limits, and environmental education and outreach could be implemented to help minimize human/wildlife conflicts.

- A potential measure could be included in the Land Stewardship Plan or in another agreement to develop a plan to manage retained open space areas to better facilitate elk, which could help reduce their impacts elsewhere.

Significant Unavoidable Adverse Impacts

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

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

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

No additional significant unavoidable adverse impacts to plants and animals, or wetlands would likely occur under SEIS Alternative 6 with implementation of the mitigation measures listed above.

Air Quality/Greenhouse Gas Emissions

Proposed Mitigation Measures (Included in the Project)

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

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

the least effect on traffic and would minimize indirect increases in traffic-related emissions.

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

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

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

Required Mitigation Measures

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

Other Possible Mitigation Measures

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

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

Significant Unavoidable Adverse Impacts

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

No significant unavoidable adverse operational impacts on regional or local air quality are anticipated under the SEIS Alternative. The 47º North site is located within an air quality attainment area for all criteria air pollutants and the project is not expected to pose issues related to air toxics.

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

Proposed Mitigation Measures (Included in the Project)

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

Bullfrog Flats Conditions of Approval (Included in the Project)

- Construction should be limited to 7:00 AM to 7:00 PM, Monday through Saturday. Sunday construction should be on an emergency basis only and would need to be approved by the City.

- All construction equipment should have adequate mufflers, intake silencers, and engine enclosures to minimize construction equipment noise.

- Any stationary equipment that generates noise should be located away from sensitive receivers, including residential uses, the school property, the cemetery, and open space areas.

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

Required Mitigation Measures

- Construction and operation of the project would be generally consistent with numerous Cle Elum Municipal Code requirements related to noise, including Chapter 2.48.130, Chapter 8.12.020, Chapter 10.20, Chapter 10.24.020, and Chapter 17.51.010. The CEMC, however, is focused primarily on nuisances and does not address or provide numerical thresholds for construction, transportation, or operational noise. As such, Washington State noise regulations would apply where the CEMC has not established noise thresholds.

- Consistent with the Cle Elum Municipal Code, the proposed RV resort would be required to submit a management plan, including rules governing park quiet hours, as part of the conditional use permit process or Development Agreement.

- Roof equipment in the commercial development could require noise baffling, if necessary, to meet state noise standards. This condition will be reviewed and any baffling requirements imposed as part of the building permit review for the commercial buildings.

Other Possible Mitigation Measures

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

Significant Unavoidable Adverse Impacts

Noise levels would increase in the study area due to short-term clearing/grading, demolition and construction noise, and long-term traffic and human noise. The noise from the proposed residential, commercial, and parks/recreational uses is expected to be minor; with implementation of the mitigation measures listed above, no significant impacts are expected.

Land Use

Proposed Mitigation Measures (Included in the Project)

- Approximately 477 acres (58% of the site) should be retained in open space, including critical areas such as the Cle Elum River, wetlands, and steep slopes. 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 should be retained by New Suncadia or transferred to the Applicant (Sun Communities).

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

- A minimum of 10 acres should be set aside and dedicated to the City for future expansion of the Laurel Hill Memorial Cemetery.

- Natural open space buffers at least 100 feet wide should be maintained along Bullfrog Road. In addition, undeveloped, forested open space should be preserved onsite within the northeastern quadrant of the Bullfrog/I-90 Interchange.

Required Mitigation Measures

- Mitigation measures identified through this SEIS would minimize land use impacts from construction activities, consistent with City regulations (see DSEIS Section 3.1, Earth,

Section 3.4, Air Quality/GHG Emissions, Section 3.5, Noise, and Section 3.13, Transportation, and FSEIS Section 3-2, **Transportation**).

- The proposed uses and land use standards would be consistent with the City of Cle Elum Comprehensive Plan and zoning for the site (see DSEIS Section 3.7, Relationship to Plans & Policies, for details). This conclusion would be verified based on submittal of the 47° North Master Site Plan application and consistency analysis contained in a staff report for the proposal.

- 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)

- A useable area of 7.5 acres should be required to be conveyed to the City of Cle Elum, or another public or non-profit entity approved by the City to develop a minimum of 50 affordable housing units. The 50 housing units should not be counted towards the 1,334-unit cap for the project. The parcel or parcels should be identified and conveyed prior to approval of the 250th residential housing unit. Under the current proposal, a 6.8-acre affordable housing site has been identified; this site should be increased to meet the 7.5-acre requirement or the density increased to meet the 50 housing unit requirement.

- The current development condition applicable to the Bullfrog Flats site would only permit 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. of areas open to the public. Primary entrance to the retail uses would not be allowed from SR 903 or Bullfrog Road. The conceptual plan for the future possible commercial development does not comply with the existing development condition. Either the types and sizes of retail uses should be adjusted, or the condition changed or eliminated in the new or updated Development Agreement.

Other Possible Mitigation Measures

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

Significant Unavoidable Adverse Impacts

The conversion of the 824-acre 47° North site from undeveloped forest/vegetation to a master plan community under any of the alternatives would represent a significant change in the existing land use of the site, and such change would be unavoidable if the Master Site

Plan is implemented. The change would be consistent with the City of Cle Elum land use and zoning classifications for the site and is not per se an adverse impact to land use or land use patterns. The site is located within a City/UGA and is considered appropriate for urban development. The proposal would represent a continuation of the existing trend of intensifying development in the City and adjacent area. With implementation of the mitigation measures listed above, no significant adverse land use impacts are expected. It is acknowledged, however, that some residents may consider the proposed development to be significant and adverse because of its size, location, or other factors.

Aesthetics/Light & Glare

Proposed Mitigation Measures (Included in the Project)

- Approximately 477 acres of the site should be preserved as open space, including natural open space, Managed Open Space, River Corridor Opens Space, wetlands and their buffers, and power line easements.

- Development areas onsite should be arranged based, in part, on existing topographic features, as reflected in the preliminary Master Site Plan. Combined with existing, retained vegetation, site planning should block views of most elements of the project from most public off-site locations, and/or reduce the perceived visibility or scale of the overall project for viewers at ground level from locations where vegetation or topography does not.

- Proposed development should be consistent with architectural design and materials guidelines that should be developed by the Applicant for residential and other structures, and specifically tailored for the 47° North project site to ensure an overall consistent visual quality. Building materials should include muted colors and textures that are intended to blend into the existing natural setting and should be comprised primarily of wood and stone.

- Low-pressure sodium lights and full-cutoff shielding should be used on outdoor light fixtures.

- Residential area light fixtures should not be mounted higher than 30 feet.

- Unnecessary lighting of building facades should be avoided.

- Landscaping should be provided throughout the site and should create transitions and buffers between various land uses on and adjacent to the site, where necessary.

- Landscaping with native plants should help visually and aesthetically connect the site to the surrounding area.

Bullfrog Flats Conditions of Approval (Included in the Project)

- Natural open space buffers at least 100 feet wide along Bullfrog Road should be maintained to screen or diffuse views to the interior of the site from this roadway. In addition, undeveloped, forested open space should be preserved onsite within the northeast quadrant of the Bullfrog/I-90 Interchange.

- Standards/recommendations for roadway lighting intensity consistent with the Illuminating Engineering Society of North America should be adopted.

- Lighting designs should be implemented in accordance with the International Dark Sky Association's Zone E1 Standards. These standards are recommended for use in "areas with intrinsically dark landscapes." Examples are national parks, areas of outstanding natural beauty, areas surrounding major astronomical observatories, or residential areas where inhabitants have expressed a strong desire that all light trespass be strictly limited."

Required Mitigation Measures

- The 50-foot-wide platted buffer adjacent to the SR 903 right of way would be maintained with possible commercial development on the adjacent 25-acre property. The existing forested vegetation in this area could be retained to partially screen the development and help maintain a natural, forested entry to the City of Cle Elum.

Other Possible Mitigation Measures

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

Significant Unavoidable Adverse Impacts

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

Development of the 47° North site under the SEIS Alternatives would result in additional ambient light from accumulated buildings and landscape lighting. This would contribute to existing skyglow effects created by Cle Elum, South Cle Elum, Roslyn, Suncadia, and I-90.

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

Housing, Population, & Employment

Proposed Mitigation Measures (Included in the Project)

Bullfrog Flats Conditions of Approval (Included in the Project)

- Access, water, and sewer should be constructed, consistent with development standards, up to the affordable housing parcel boundaries, as with every other parcel in the Master Site Plan.

- Sun Communities, as successor to New Suncadia, should be given the option in a new or revised Development Agreement to assist in the selection process for potential owners/developers of the affordable housing parcel.

- A minimum of 150 residential dwelling units, not including the 50 possible affordable housing units, should remain rental units and a covenant should be recorded on the property to ensure this condition continues for 20 years. Note that all the 180 proposed multi-family housing units in 47º North are proposed to be leased/rented, and manufactured housing are preliminarily proposed to be available for rent as well.

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 proposal would far exceed this requirement.

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

- A useable area of 7.5 acres should be conveyed to the City of Cle Elum, or another public or non-profit entity approved by the City. Under the current proposal, a 6.8-acre affordable housing site has been identified; either this site should be increased or development density on the affordable housing site should be increased.

- 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. This condition may not be relevant to 47º North since construction

labor demand would be considerably less than for Bullfrog Flats due to the inclusion of manufactured housing.

- The existing labor pool should be actively recruited, hired, and contracted with to minimize in-migration employment and associated housing impacts. This condition may not be relevant to 47º North since construction labor demand would be considerably less than for Bullfrog Flats due to the inclusion of manufactured housing.

Other Possible Mitigation Measures

- The estimated monthly mortgage payment for proposed single family housing could be made 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 could be located onsite throughout the proposed residential development.

Significant Unavoidable Adverse Impacts

Development of the 47° North site under the SEIS Alternatives would increase housing demand, permanent population, and employment in the City. The amount of planned growth could be considered significant, and it is an unavoidable consequence of developing the Master Site Plan. In and of itself, however, growth is not necessarily an adverse impact if it has been properly planned for, including providing for adequate housing, infrastructure, and services (see Section DSEIS 3.12, Public Services, Section 3.13, Transportation, and 3.14, Utilities, and FSEIS Section 3-2, **Transportation**, Section 3-4, **Utilities**, and Section 3-5, **Public Services**, for information on the capacity of infrastructure and services to accommodate the SEIS Alternatives, and mitigation measures to address any significant impacts). It is recognized, however, that some people may consider any additional growth, and/or the particular types of development, to be an adverse impact.

Historic & Cultural Resources

Proposed Mitigation Measures (Included in the Project)

- When the 25-acre property contemplated for future commercial use is proposed to be developed, a field investigation of the property should be conducted.

Required Mitigation Measures

- Consultation with Department of Archaeology and Historic Preservation (DAHP) and Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) would continue.

- Compliance with all state regulations (e.g., RCW 27.44, RCW 27.53, SEPA) related to cultural resources would continue. This includes State law regarding the need for an Archaeological Site Alteration Permit from DAHP for any disturbance to archaeological

sites with objects that pre-date the historic era (i.e., precontact archaeological sites) or disturbance to historic archaeological resources that are eligible for or listed in the NRHP. Alterations to a site can include adding fill, building on, removing trees, using heavy equipment on, compacting, or other activities that would change or potentially impact the site, as well as archaeological excavations.

- An inadvertent discovery plan would be adopted for the project and made available onsite during construction.

- Onsite monitoring by a professional archaeologist or cultural resources specialist would take place during all ground disturbing activities with potential to intersect Holocene deposits, which were observed up to 8.5 feet below ground surface, including clearing, grubbing, grading, and construction excavations.

- Construction personnel would be trained on the identification of archaeological resources.

- In the event that ground disturbing or other activities result in the inadvertent discovery of archaeological deposits, work would be halted in the immediate area and contact made with DAHP. Work would be halted until such time as further investigation and appropriate consultation is concluded. See FSEIS **Appendix B** for details on protocols for inadvertent discoveries.

- In the unlikely event of the inadvertent discovery of human remains, work would be immediately halted in the area, the discovery covered and secured against further disturbance, and contact made with law enforcement personnel, consistent with the provisions set forth in RCW 27.44.055 and RCW 68.60.055. See FSEIS **Appendix B** for details on protocols for inadvertent discoveries.

Significant Unavoidable Adverse Impacts

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

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.

- Three public trail parks totaling approximately 1.5 acres and two Community Trail Parks totaling 1.0 acres should be provided.

- An approximate 6-acre adventure center open to residents and the public should be provided.

- Two private recreational amenity centers totaling approximately 11 acres should be provided, one in the RV resort and the other in the residential area.

- A 627-site RV resort, including recreational facilities, should be provided.

- An approximate five-mile trail system and one mile of sidewalks should be provided that would connect on-site development and link to off-site trails in several locations.

Bullfrog Flats Conditions of Approval (Included in the Project)

- The Applicant should support the City's efforts to obtain the necessary right of way or easement to construct an off-site connection from the 47° North site to the existing Coal Mines Trail and should contribute to the cost of the materials to construct the off-site trail connection.

Required Mitigation Measures

- The proposed recreational uses would be generally consistent with the City of Cle Elum Parks and Recreation Plan and would meet or exceed the Plan's LOS goals/targets for active parks, open space, trails/tracks/connections, and associated facilities.

- The specific locations and sizes of parks would be identified in the application and on the Master Site Plan in accordance with Parks and Recreation Targets/Goals in the City's Comprehensive Plan.

Significant Unavoidable Adverse Impacts

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

Public Services

Proposed Mitigation Measures (Included in the Project)

- All the non-residential buildings should include sprinkler systems in case of fire. Fire hydrants should be provided throughout the residential areas.

- Traditional wood campfires should not be allowed within the RV resort.

Bullfrog Flats Conditions of Approval (Included in the Project)

- Mitigation measures for each public service provider should include execution of a separate mitigation agreement and a program to monitor actual revenues and expenses for that provider. The program should, 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 should also rely on shortfall mitigation payments to address any identified fiscal impacts.

- Site development should follow the Land Stewardship Plan (LSP) that is used for Suncadia, which includes provisions for control of noxious weeds during construction, and fire-wising (e.g., thinning small trees, cutting limbs, raking debris and other fuel-reduction techniques) during operation of the project. The LSP should be reviewed and updated, as necessary.

- Any emergency vehicle access, other than the public right of way should be coordinated with the City of Cle Elum Fire Marshall.

Required Mitigation Measures

- Worker safety measures would be implemented consistent with Occupational Safety and Health Administration (OSHA) and Washington Industrial Safety and Health Act (WISHA).

- A comprehensive construction plan would be developed. This plan would include, in part, a Fire and Life Safety plan, which would be consistent with the City of Cle Elum's adopted building code requirements for construction, a snow management plan, designated emergency haul routes and access areas, and provisions for fencing and signing the construction site.

- Roadway design would conform with applicable requirements for vehicular access, including roadway width, adequate turning radius, fire hydrant access, provisions for vehicle back up, and weight bearing capacity.

- 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).

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

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

Other Possible Mitigation Measures

- An on-site security presence could be provided during the initial construction phase of the project.

- As an interim measure, the Applicant could emphasize and encourage membership in the volunteer fire department among its residents and employees while the department is transitioning to full-time staff.

- Community education regarding domestic and recreation fire protection measures could be provided to help reduce the potential for wildfires.

Significant Unavoidable Adverse Impacts

Development under the SEIS Alternatives would generate additional demand for public services primarily as a result of new population and visitors to the site; this increase in demand is unavoidable. Increased demand in itself, however, is not necessarily an adverse impact, if it is planned for and addressed. To the extent that resulting requirements for additional staff, equipment, and facilities are addressed through increased revenues to affected agencies, and through implementation of committed and recommended mitigation measures listed above, no significant impacts are expected. Also see DSEIS Section 3.15, Fiscal and Economic Conditions, and FSEIS Section 3-7, **Fiscal and Economic Conditions**.

Transportation

Mitigation Measures for SEIS Alternatives 5 & 6

Intersection improvements to mitigate future non-compliant LOS with SEIS Alternative 5 and 6 in future years 2025, 2031, and 2037, for the weekday summer PM peak hour are shown in **Table 10**. Improvements to address non-compliant LOS under 'Baseline'/background conditions are also included. As shown in **Table 10**, the mitigation measures for SEIS Alternative 5 are anticipated to be similar to the mitigation measures identified for SEIS Alternative 6. This is due to the fact that the development amounts and weekday PM peak hour trip generation estimates for SEIS Alternatives 5 and 6 would be similar in the time periods analyzed; the RV sites proposed in SEIS Alternative 6 would generate approximately the same number of trips as the multi-family residential units in SEIS Alternative 5. The only difference between Table 3.13-19 in the DSEIS and **Table 10** in this FSEIS are in the timing of non-compliance, and therefore mitigation as well, at five study intersections, as follows:

Table 10
SUMMARY OF MITIGATION MEASURES AND PRELIMINARY ESTIMATED PRO-RATA SHARE FOR SEIS ALTERNATIVE 6

Off-Site Study Intersection	Estimated Year Improvement Required (Forecast LOS)	Potential Improvement to Mitigate LOS Deficiency [1]	WITH 100% OCCUPANCY OF 47° NORTH RV RESORT [2]						WITH 50% OCCUPANCY OF 47° NORTH RV RESORT [2]					
			METHOD A Estimated Pro-Rata Share [3]			METHOD B Estimated Pro-Rata Share [3]			METHOD A Estimated Pro-Rata Share [3]			METHOD B Estimated Pro-Rata Share [3]		
			Back-ground Share [4]	SEIS Alternative 6 Share		Back-ground Share [4]	SEIS Alternative 6 Share		Back-ground Share [4]	SEIS Alternative 6 Share		Back-ground Share [4]	SEIS Alternative 6 Share	
				47° North	Commercial Parcel		47° North	Commercial Parcel		47° North	Commercial Parcel		47° North	Commercial Parcel
IMPROVEMENTS NEEDED FOR 'BASELINE'/BACKGROUND CONDITIONS														
#8 – Ranger Sta Rd / Miller Ave / W 2nd St (SR 903) [7]	2025 (LOS D)	Compact RAB or Signalization	76.6%	20.4%	3.0%	76.6%	20.4%	3.0%	78.1%	18.4%	3.5%	78.1%	18.4%	3.5%
#11 – Douglas Munro Blvd / W 1st Street	2025 (LOS E)	RAB or Signalization	96.7%	2.9%	0.4%	96.7%	2.9%	0.4%	97.1%	2.4%	0.5%	97.1%	2.4%	0.5%
#12 – N Pine St / W 1st Street	2025 (LOS D)	Traffic Signal or Left-Turn Restrictions	97.4%	2.3%	0.3%	97.4%	2.3%	0.3%	97.4%	2.2%	0.4%	97.4%	2.2%	0.4%
#13 – N Stafford Ave / W 2nd Street (SR 903) [7]	2025 (LOS E)	Compact RAB or Signalization	83.2%	16.8%	2.5%	83.2%	16.8%	2.5%	82.2%	15.0%	2.8%	82.2%	15.0%	2.8%
IMPROVEMENTS NEEDED FOR CONDITIONS WITH SEIS ALTERNATIVE 6 [5]														
By Year 2025:														
#9 – N Pine Street / W 2nd Street (SR 903) [7]	2025 (LOS D)	Compact RAB or Signalization or Turn Restrictions	n/a	87%	13%	77.1%	19.9%	3.0%	n/a	84%	16%	78.6%	18.0%	3.4%
#15 – N Oakes Ave / W 2nd Street (SR 903) [7]	2025 (LOS D)	Compact RAB or Signalization	n/a	87%	13%	85.6%	14.4%	2.1%	n/a	84%	16%	85.0%	12.6%	2.4%
By Year 2031:														
#1 – Bullfrog Road / I-90 EB Ramps [7]	2031 (LOS D)	Compact RAB or Signalization	n/a	64%	36%	77.4%	14.5%	8.1%	n/a	61%	39%	80.7%	11.8%	7.5%
#7 – Denny Ave / W 2nd Street (SR 903) [7]	2031 (LOS E)	Refuge/merge lane on SR 903 or Left- Turn Restrictions	n/a	64%	36%	68.1%	20.4%	11.5%	n/a	61%	39%	69.1%	18.8%	12.1%
#21 – Pennsylvania Ave / 1st Street (SR 903) [7]	2031 (LOS D)	All-Way Stop	n/a	64%	36%	90.1%	6.3%	3.6%	n/a	61%	39%	90.4%	5.9%	3.7%
By Year 2037: [6]														
#2 – Bullfrog Road / I-90 WB Ramps [7]	2037 (LOS E)	Compact RAB or Signalization	n/a	0%	100%	81.8%	9.1%	9.1%	n/a	0%	100%	84.2%	7.3%	8.5%
#3 – Bullfrog Road / Tumble Creek Dr	2037 (LOS F)	Refuge/merge lane on Bullfrog Rd	n/a	0%	100%	81.1%	9.5%	9.4%	n/a	0%	100%	83.3%	7.7%	9.0%

1. Improvement needed to mitigate non-compliant LOS during weekday PM peak hour; with improvement the intersection LOS would meet standard. RAB = Roundabout.
2. Average occupancy of 47° North RV resort during summer weekday PM peak hour estimated to be 50% based on data provided by Applicant. Estimated pro-rata shares are presented for both 100% and 50% RV resort occupancy.
3. Estimated pro-rata share for 47° North and commercial parcel are preliminary estimates and will be adjusted based on a future Monitoring Program.
4. Share of future traffic volumes associated with background traffic growth not specifically from SEIS Alternative 6.
5. Mitigation not triggered by 'Baseline' conditions, but triggered by traffic generated by SEIS Alternative 6 (47° North and/or commercial parcel).
6. 47° North is anticipated to be built out by 2031. Therefore pro-rata share of mitigation triggered by SEIS Alt 6 in 2037 is 100% to the commercial parcel for pro-rata Method A.
7. Separate Intersection Control Evaluation (ICE) studies at WSDOT intersections will be conducted to evaluate and recommend specific mitigation during review of a project application.

- #1 – Bullfrog Road / I-90 EB Ramps is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2031 instead of 2037;
- #8 – Ranger Station Road / Miller Avenue / W 2nd Street (SR 903) is anticipated to operate at a non-compliant LOS under 'Baseline' conditions in 2025 instead of SEIS Alternative 6 conditions in 2025;
- #9 – N Pine Street / W 2nd Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2025 instead of 2031;
- #15 – N Oakes Ave / W 2nd Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2025 instead of 2031; and,
- #21 – Pennsylvania Ave / 1st Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2031 instead of 2037.

To assist the Applicant, City of Cle Elum, and WSDOT in confirming the appropriate type of mitigation improvements, Intersection Control Evaluation (ICE) documents are being prepared and will be considered during review of a project application. ICE documents will be prepared for study intersections within WSDOT's jurisdiction. Criteria addressed in the ICE analyses will include: LOS operations, safety, right-of-way acquisition, engineering criteria and feasibility, and context for sustainable design. The City may also require a similar ICE analysis at the two additional (non-WSDOT) intersections that are anticipated to operate at non-compliant LOS.

Table 10 identifies mitigation based on occupancy of the RV resort; both 100% occupancy of the 47° North RV resort during the summer weekday PM peak hour (consistent with the DSEIS) and 50% occupancy of the 47° North RV resort during the summer weekday PM peak hour (based on new data provided by the 47° North Applicant at two existing and similar RV resort properties in the U.S.).

Table 10 includes a preliminary estimate of the pro-rata share for the 47° North (residential and RV uses) and the future commercial development based on forecast future traffic volumes with SEIS Alternative 6 during the year in which mitigation is necessary to maintain acceptable LOS (i.e., 2025, 2031, and 2037). For intersections where improvements would be needed by 2037, there would be no pro-rata share for 47° North since the project is anticipated to be built out before 2031; therefore 100% of the pro-rata share would be the responsibility of the commercial development. Two methods of calculating pro-rata share are included in the FSEIS: Method A (Developer Responsibility) - For intersections where improvements would be needed by 2025 or 2031 with SEIS Alternative 6 to meet LOS standards, the pro-rata share would be the full responsibility of the 47° and the separate commercial parcel; and Method B (Shared City/Developer Responsibility) - This method identifies the share of the 47° North and commercial parcel as a portion of the mitigation responsibility and shares the remaining portion with background growth. This method assumes that the governmental entities responsible for the intersection would contribute

funds proportionate with their shares of the future forecast traffic at the intersection. There are also other potential pro-rata share methods that could be applied to fund transportation mitigation.

The pro-rata shares summarized in **Table 10** are preliminary estimates based on forecasts of future traffic; the final pro-rata share percentages for the 47° North development and commercial parcel are anticipated to be confirmed using a recommended Monitoring Program that should be established in a new or updated Development Agreement. The detailed pro-rata share calculations are included in FSEIS **Appendix A**.

Additionally, although improvements to mitigate future non-compliant LOS at study intersections with SEIS Alternative 6 during the weekday PM peak hour for peak summer conditions have been preliminarily identified in **Table 10**, the specific mitigation to be constructed and the timing of the mitigation is anticipated to be further refined based on input and evaluation from the Applicant and the City of Cle Elum, and with potential input from other stakeholders (e.g., Kittitas County and WSDOT), as appropriate. Other factors that may be considered by the stakeholders in determining the specific improvement and timing as part of a new or updated Development Agreement may include right of way acquisition, engineering criteria and feasibility, and cost.

Note that the mitigation measures identified in **Table 10** are intended to mitigate the anticipated weekday PM peak hour conditions during the peak summer months. However, improvements identified to mitigate weekday PM peak hour non-compliant LOS during peak summer conditions would also improve conditions during Friday and Sunday PM peak hour conditions during both the peak summer and non-summer periods.

Other Mitigation Measures

Traffic Monitoring Program

The 47° North development should prepare and implement a traffic monitoring program as part of a new or updated Development Agreement. It is expected that the traffic monitoring program would be similar in format and function to the previously established program documented in the 2002 Development Agreement (Condition 92). The monitoring program would be coordinated with the City, in cooperation with Kittitas County and WSDOT, and would have the following objectives:

A. Document traffic volumes at key locations (roadways and/or intersections) in the local transportation network that would be impacted by traffic generated by the 47° North development;
B. Separate traffic volumes at key locations by background traffic, 47° North development traffic, and traffic associated with development of the commercial property; and,

C. Help establish or confirm the timing, location, and nature of required transportation improvements and consider the pro-rata share calculations.

The specific details of the traffic monitoring program, including the number of phases of monitoring, appropriate timing of phases of monitoring (i.e., at defined development years or relative to percent or number of units constructed), time periods to be counted, key locations to be counted, and reporting requirements will be coordinated with the City as part of the new or updated 47° North Development Agreement.

Construction Management Plan

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

Trail System & Sidewalks

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

Significant Unavoidable Adverse Impacts

Proposed development under SEIS Alternatives 5 and 6 would increase traffic volumes and congestion on area roadways (e.g., in the City, County, and on state facilities such as SR 903, SR 907, and I-90); this is an unavoidable effect of urban development. The LOS analysis indicates that several of the studied intersections would exceed LOS standards during the PM summer peak hours in the future analysis years with the additional traffic generated by the SEIS Alternatives; some of these intersections would also exceed the LOS standards without the projects due to continued growth in background traffic, without the projects. The mitigation measures listed above would offset or reduce the significant adverse impacts under SEIS Alternative 6. The measures will ultimately be included in a new or updated Development Agreement between the Applicant and the City.

Utilities

Proposed Mitigation Measures (Included in the Project)

- Recycling within the 47° North development should be encouraged.

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

Water & Sewer

- Draft Water Use Standards should be updated as part of the Development Standards for the proposed development. The standards should be required under the project Covenants, Conditions, & Restrictions (CC&Rs).

- Water use and conservation policies should be contained in the CC&Rs for the project, including low-flow fixtures, limitations on landscaping, and other water-conservation measures, as coordinated with the City of Cle Elum.

- Limitations should be set on the area allowed for irrigation for each type of residential unit.

- Irrigation efficiency should be promoted through educating and recommending the use of drought-tolerant landscaping to the residential and commercial property owners.

- The Applicant should be responsible for the costs to design and construct all water, sewer, and stormwater facilities onsite.

- In accordance with the City of Cle Elum's adopted water policy for the UGA, the City will initially issue certificates of water availability for the project based on the water use rate set forth in the City's 2015 Comprehensive Water Plan. The Washington State DOH design criteria requires a minimum of three years of historical consumption data be used in establishing ERU average demand.

Solid Waste

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

Required Mitigation Measures

Water & Sewer

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

Zone 3. Projected water demands would be translated into actual consumption as the development phases are constructed.

Projected water demand would be translated into actual consumption as the phases of development are constructed. The 2001 Water Supply System Project Development Agreement between the City of Cle Elum and Trendwest (now New Suncadia) established "trigger" points when improvements would become necessary, including production thresholds for specified duration, or when a specified number of new connections are reached. Similar "trigger" points should be established for the three system components identified above.

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

Solid Waste

- The Applicant would handle all construction debris, separate re-cyclable materials, and otherwise handle all its solid waste and household hazardous waste consistent with the requirement for such handling in the Kittitas SWMP.

Significant Unavoidable Adverse Impacts

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

Fiscal & Economic Conditions

Proposed Mitigation Measures – Economic Impacts

- The nature of the impacts identified for SEIS Alternative 6 should include: increases in employment opportunities, increases in potential personal income, lower unemployment rates, diversity in the workforce, and added new business commerce. Impacts would be positive, and mitigation is not warranted.

Proposed Mitigation Measures – Fiscal Impacts

This section presents fiscal mitigation measures by taxing authority/entity to address the findings for SEIS Alternative 6, including (47° North) and (the commercial property).

City of Cle Elum

The analysis focused on a calculation of net fiscal impacts for the City of Cle Elum. For SEIS Alternative 6, the analysis identified a fiscal surplus in 2037. Based on this analysis and considering the residential/RV and commercial elements of Alternative 6 together, mitigation for fiscal impact is not anticipated to be necessary to maintain the City's fiscal solvency. However, when looking at the components of SEIS Alternative 6 – 47° North and the commercial property – separately, the future commercial development would generate a fiscal shortfall in earlier years. However, the deficit would be addressed in later years when revenues increase. The residential and RV resort would generate fiscal shortfalls post buildout due to cessation of construction related sales taxes and increasing City costs (e.g., staff salaries) over time.

Given the distinct findings for SEIS Alternative 6 for 47° North and the commercial property, should future mitigation become necessary — consistent with typical municipal budgeting practices — the City should consider imposing new taxes or fees to balance its budget or seek to change levels of public services to meet available revenues, or a combination of both approaches.

Implementation of a periodic fiscal monitoring program (e.g., in two to five-year increments) should also be considered following buildout. Fiscal monitoring could reasonably occur during buildout as well, however, revenues may lag behind costs resulting in an incomplete picture of the impact. Fiscal monitoring could be particularly helpful as costs and revenues unassociated with the 47° North portion of SEIS Alternative 6 would impact the City's overall fiscal situation along with the proposed development. Additionally, the DSEIS assumes the City's Fire Department will move to full time employment and away from its current model of service. Furthermore, future negotiations should consider the measures proposed in the Approved Bullfrog Flats Development Agreement. That agreement identified several conditions to mitigate fiscal shortfalls and to ensure existing citizens and ratepayers would not suffer negative financial impacts as a result of the development. Conditions cited that Trendwest (now New Suncadia) would: allow a Municipal Facilities and Services Expansion Plan to guide capital expansions; make fiscal shortfall mitigation payments; pay for the development's share of planning, water/wastewater treatment plant construction, and permit fees; and, coordinate security forces with police and fire services.

Kittitas Hospital District No. 2

Fiscal analysis for the Hospital District found that projected costs were greater than projected property tax revenues under SEIS Alternative 6 (in particular 47° North). However, the District would also receive patient service fees. It is, therefore, difficult to assess the underlying fiscal situation of the District over time. The analysis assumed that new Full Time

Equivalent (FTE) employees would be added to meet service needs, and, therefore, as service needs grow, so too would patient service fees.

A future mitigation agreement should consider a fiscal monitoring program. The Hospital District could track property tax revenues and patient fees attributed to SEIS Alternative 6 (47° North) and, should revenues not cover costs of service (over a certain period of time), a monthly mitigation payment could be made to the Hospital District to avoid fiscal shortfalls.

KITTCOM

Projected revenues from the KITTCOM phone tax exceeded projected costs for new FTE in SEIS Alternative 6 as a whole and the 47° North component of this alternative. Accordingly, fiscal mitigation is not anticipated to be necessary.

Revenues did not, however, exceed costs for the commercial parcel under SEIS Alternative 6. The analysis did not factor in intergovernmental revenues or subscriber fees which could address the fiscal shortfall. It is reasonable to assume that intergovernmental revenues would scale up with growth in the city/county. Further, subscriber fees could reasonably be restructured to cover additional funding needs as underlying needs change.

Cle Elum-Roslyn School District

The net fiscal impact to the school district from SEIS Alternative 6 is unclear. The analysis shows that cumulative costs derived from projected new teacher FTE were estimated to exceed projected property tax revenues for operations under SEIS Alternative 6. However, the District would receive additional intergovernmental revenues which are expected to offset fiscal shortfalls, mainly through state support for schools funded by the state property tax.

Similar to existing agreements between Trendwest (now New Suncadia) and the School District (e.g., the December 2001 Letter to the District from Trendwest and the January 2003 School Mitigation Agreement between Trendwest and the School District), a School Mitigation Agreement could be executed between the Applicant and the District that would:

- Reimburse the District for the costs of starting up and maintaining a system to account for student enrollment related to the 47° North project;
- Contribute to the costs of portables attributable to the project; and
- Contribute to the costs of buses attributable to the project.

Significant Unavoidable Adverse Impacts

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

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

Chapter 2

DESCRIPTION OF PROPOSED ACTION(S) AND ALTERNATIVES

CHAPTER 2
DESCRIPTION OF PROPOSED ACTION(S) AND ALTERNATIVES

This chapter of the *Proposed 47° North Master Site Plan Amendment Final Supplemental Environmental Impact Statement* ("Final SEIS" and "FSEIS") describes the 47° North proposal and alternatives. It also provides background information, including:

1) An overview of the 2002 *Trendwest Properties: Cle Elum Urban Growth Area (UGA) Environmental Impact Statement*[1] ("2002 Cle Elum UGA EIS"); and,
2) A general description of approvals that have occurred since the 2002 Cle Elum UGA EIS was issued; why a SEIS is being prepared; and, what will occur after the SEIS is issued.

Key concepts related to this SEIS are presented in *Section 2.4* of this chapter in question and answer format. A more detailed description of the SEIS Alternatives is contained in *Section 2.5*. Any changes to the information presented in **Chapter 2** since publication of the Draft SEIS are highlighted in grey. **Chapter 1** contains an updated summary of the alternatives, impacts, mitigation measures; **Chapter 3** topic area responses, and updated information and analysis;[2] and **Chapter 4** all the comments that were received during the Draft SEIS comment period.

Note that the the site and proposed projects have been referred to using various names over the years, including "Cle Elum UGA" and "Bullfrog Flats." The current Applicant, Sun Communities, Inc. ("Sun Communities") has renamed the proposed project "47° North." In this SEIS, *Bullfrog Flats* is used to refer to historical documents and entitlements related to the original Trendwest (now New Suncadia, LLC) project or the property, and *47° North* refers to amendments to the approved Master Site Plan that are proposed by Sun Communities.

[1] An Environmental Impact Statement (EIS) or Supplemental EIS (SEIS) is a document required by the State Environmental Policy Act (SEPA) for actions that are likely to have significant adverse impacts on the environment. An EIS/SEIS is a tool that provides information for decision-making. It is not a decision in itself and does not authorize any action.

[2] Many comments that were received on the DSEIS identified common topics, and these are referred to as "topic areas" in this FSEIS. This approach is intended to reduce repetition and to provide a single comprehensive response to identical or similar comments that share a common theme. **Chapter 3** of the FSEIS lists the topic areas and provides collective responses to the substantive comments. Additional information and analyses were prepared to address some of the comments and are also summarized in **Chapter 3** under the applicable responses.

2.1 INTRODUCTION

Bullfrog Flats is an approximately 1,100-acre property 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 property is currently owned by New Suncadia, LLC ("New Suncadia"). In 2002, the City approved a Subarea Plan, Master Site Plan, and Development Agreement for the property, and the site was annexed to the City that same year.

Sun Communities is in the process of acquiring approximately 824 acres of the Bullfrog Flats property from New Suncadia and is proposing changes to the approved Master Site Plan. New Suncadia is retaining a portion of the property and intends, in the future, to possibly develop approximately 25 acres for commercial use.

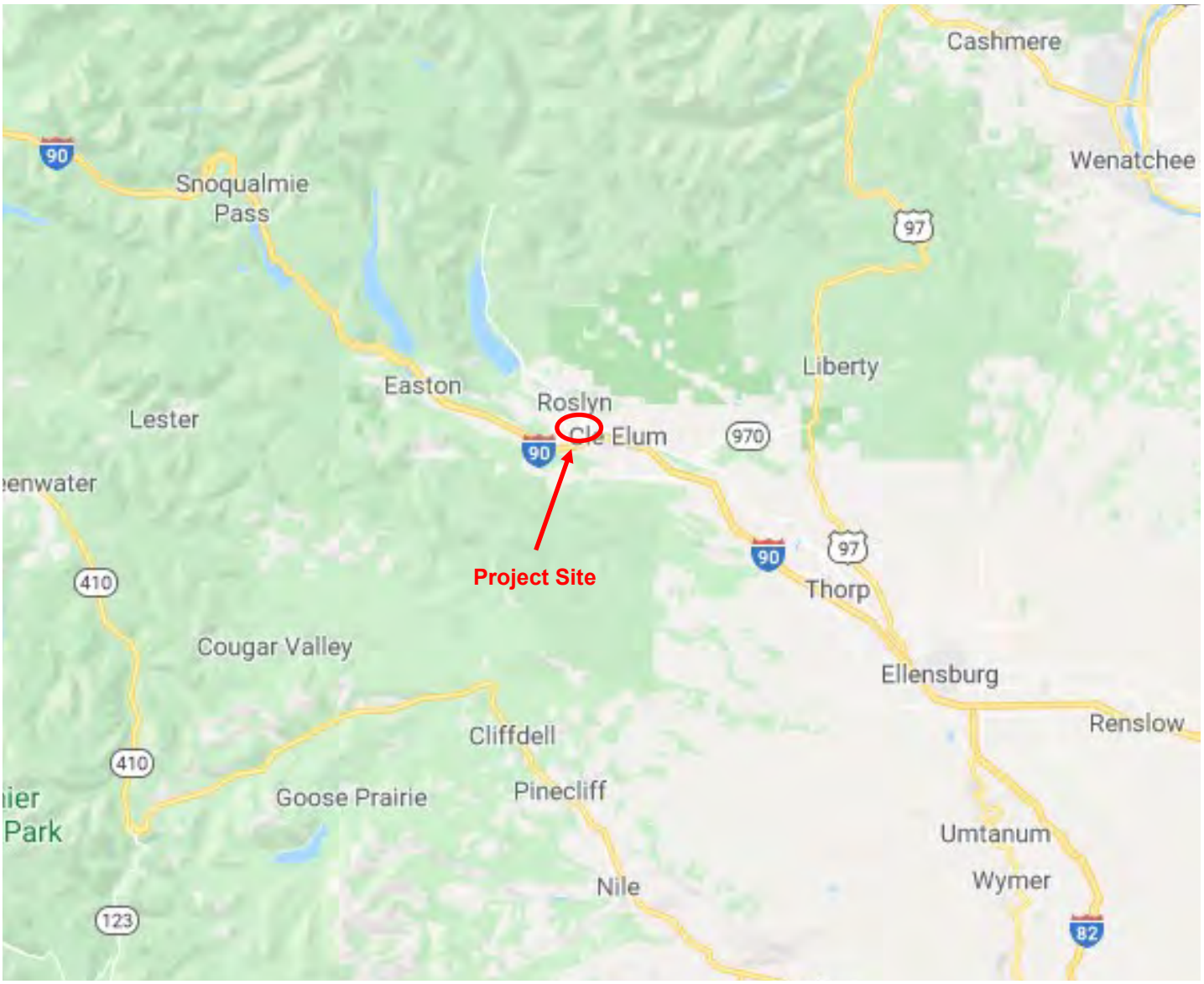
2.2 BACKGROUND

Approved Bullfrog Flats Master Site Plan & Development Agreement

The Master Site Plan approved for the Bullfrog Flats property in 2002 provided for the construction of 1,334 dwelling units (including 810 single family units and 524 multi-family units), as well as a 75-acre (950,000 sq. ft.) business park. It also provided for dedication of several properties to the City: 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 Development Agreement between the City and New Suncadia is an agreement that details the obligations of both parties and specifies the standards and conditions that will govern development of the property. The Development Agreement was based on the 2002 EIS prepared for the Cle Elum UGA and the Bullfrog Flats Master Site Plan, before the property was annexed to the City. The Development Agreement includes over 120 conditions. In accordance with the provisions of the Development Agreement, 12 acres were dedicated to the City in 2002 for the water treatment plant, 35 acres were dedicated to the Cle Elum School District in 2003 for expansion of the school campus, and 175 acres were dedicated to the City in 2008 to establish the Washington State Horse Park. Dedication of the properties for the cemetery expansion and affordable housing has not occurred; an agreement related to the municipal/community recreation center property was recently reached between the City of Cle Elum and New Suncadia. A preliminary plat application was filed and approved within two years of annexation. However, no significant development activities have taken place onsite to date. In 2017, the Development Agreement was amended to extend the termination date by 10 years to 2027.

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. Sun Communities expects to submit an application to the City in late Spring 2021 proposing



Note: This figure is not to scale

North

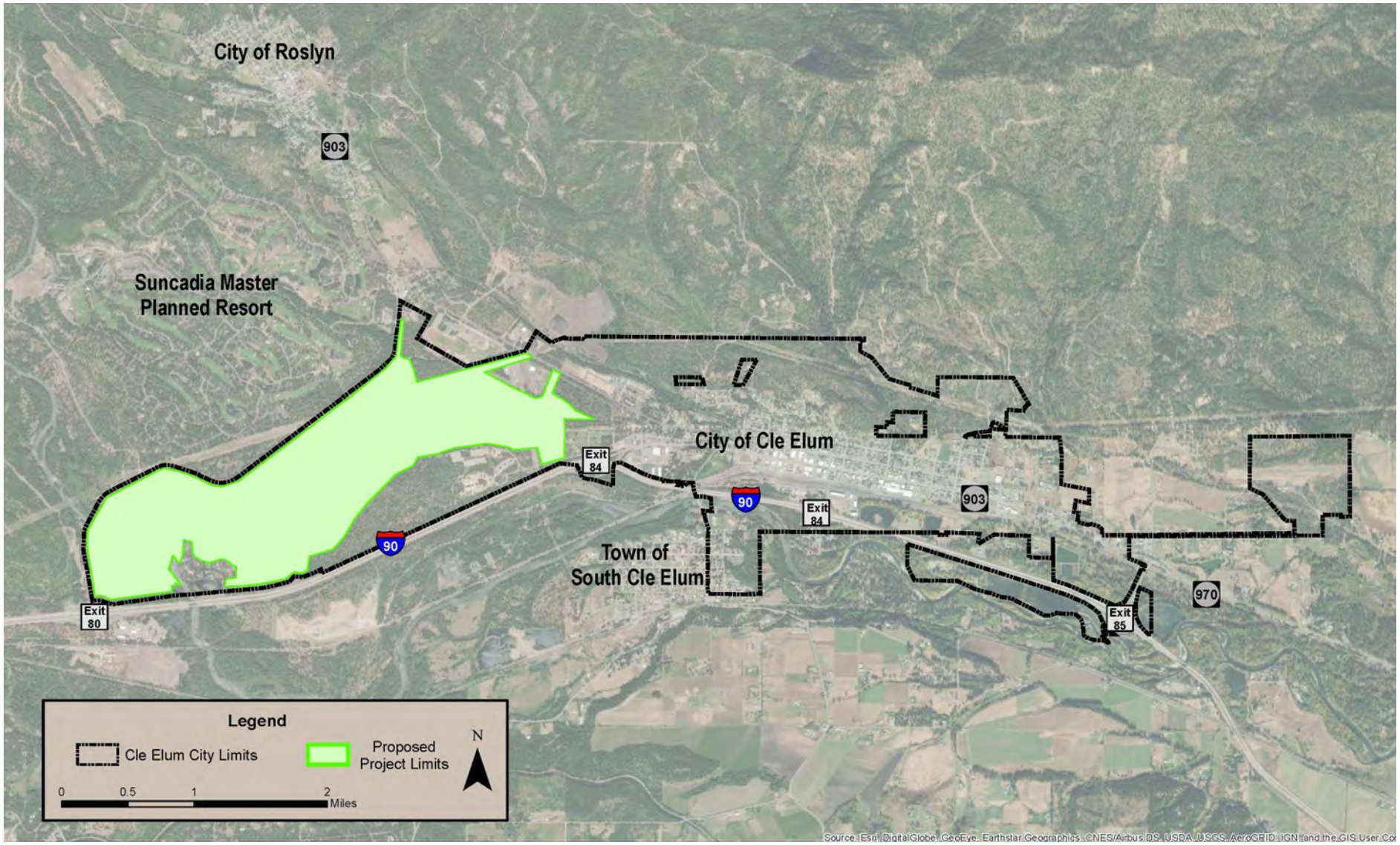
Source: Google Maps and EA Engineering, 2020.

EA Engineering, Science, and Technology, Inc., PBC

H-02

Figure 2-1

Regional Map



Source: City of Cle Elum, 2019.

EA Engineering, Science, and Technology, Inc., PBC

Figure 2-2

Vicinity Map

amendments to the approved Master Site Plan that would reduce the number of single family residences to 527 units, reduce the number of multi-family dwelling units to 180, and add a Recreational Vehicle (RV) resort with 627 RV sites. Other proposed changes to the amounts and locations of development are described later in **Chapter 2**.

The agreement between the City of Cle Elum and New Suncadia related to the municipal/community recreation center, which is now being implemented, provides for transfer of title to the recreation center site and payments to support construction of a facility. As such, the Proposed 47° North Master Site Plan Amendment no longer includes the recreation center. The Proposed 47° North Master Site Plan Amendment graphic (**Figure 2-6** later in this chapter) has been adjusted to show the recreation center outside the site boundary. However, similar adjustments have not been made to other graphics in this FSEIS, but the reader should assume that the recreation center is outside the site boundary on those graphics as well. Removal of the recreation center from the site reduces the site area by approximately 12 acres, resulting in a total site area of approximately 812 acres (see **Table 2-1** later in this chapter). This represents an approximately 1% reduction in the site area, which would not result in significant changes for the SEIS analysis. As such, the site area has not been adjusted elsewhere in this FSEIS, and impacts are expected to be as represented in the DSEIS and this FSEIS.

Other Related Agreements & Actions

RIDGE Settlement Agreement

In 2001, a Settlement Agreement was executed between Trendwest (the former owner of the Suncadia Master Plan Resort [MPR]) and RIDGE (a Roslyn-base conservation organization). The Settlement Agreement regulated numerous aspects of development in the MPR and the UGA, which together totaled approximately 7,000 acres. In 2013, the Kittitas County Superior court terminated the Settlement Agreement because specific provisions of the agreement had not been met. Therefore, the Settlement Agreement no longer pertains to the MPR or the Bullfrog Flats (and now 47° North) properties.

Water Rights

There was no water available when the Suncadia resort was originally planned or when approvals for the Bullfrog Flats property were granted by the City. Since then, Trendwest has acquired sufficient senior water rights for the MPR and Bullfrog Flats projects, and to provide water for a number of water banks. New water users can purchase water rights from the bank. New Suncadia is in the process of conveying its water rights to the City of Cle Elum (see DSEIS Section 3.2, **Water Quantity and Quality**, for details).

2.3 **APPLICANT'S** OBJECTIVES

Who is the Applicant?

The Applicant, Sun Commnities, is a national developer and operator of manufactured home and RV resort communities. Sun Communities has developed, operates, or has an interest in 382 housing communities in 31 states and Canada, which include fee ownership and rental housing for families and active adults.

What are the **Applicant's** Vision & Objectives for 47º North?

Applicant's Vision

Sun Communities vision for 47° North, as expressed by the Applicant in its initial project information submitted to the City, is to form a partnership with the City of Cle Elum in a joint mission to provide housing that is financially accessible for both local and public service employees. Development will also include an RV resort that will incorporate high development and infrastructure standards.

The vision for 47° North will be guided by the revised Master Site Plan. The Master Site Plan will be implemented based on a revised or new Development Agreement, project-specific conditions of approval, and site-specific development permits approved by City of Cle Elum. The plan will reflect the mixed-use nature of the community, as permitted by the underlying zoning, including residential and recreational opportunities. As with master plans generally, the Master Site Plan will be directive in terms of the land uses that will be permitted in 47° North, but also general in some respects to allow for flexibility to respond to market demands.

Applicant's Objectives

For the purposes of SEPA review (WAC 197-11-440), the following are the Applicant's stated objectives for the 47° North project:

- Develop the existing site into a new, cohesive master planned community that will provide opportunities for a range of land uses and activities, including new residential, RV resort, parks/recreational/open space uses.

- Amend the approved Master Site Plan, reducing the number of single family and multi-family dwelling units, and adding a RV resort.

- Reserve and dedicate to the City of Cle Elum areas for future affordable housing and expansion of the cemetery.

- Respect the site's location within the surrounding community, including ensuring compatibility with area land uses and transportation systems, and creating necessary on-site road and utility networks.

- Protect naturally constrained areas on the site and in the surrounding areas, including the Cle Elum River, wetlands, and steep slopes.

- Continue to coordinate with federal, state, and local agencies, tribes, organizations, and the public and private sectors to facilitate development planning and implementation that will be successful and an asset to the City of Cle Elum and nearby communities.

- Propose new development that is economically feasible for the market and reasonably achievable within a practical time period.

2.4 KEY STATE ENVIRONMENTAL POLICY ACT (SEPA) & SEIS CONCEPTS

The following are key concepts related to SEPA and the 47° North SEIS, presented in question (*Q)* and answer (*A)* format.

Q1. What significant SEPA review has occurred previously on and related to the 47° North Project?

A1. The *Trendwest Properties: Cle Elum UGA Environmental Impact Statement* (Draft and Final) was issued in 2001 (Draft EIS) and 2002 (Final EIS). Its sufficiency was not challenged.

Q2. What were the environmental issues and EIS Alternatives analyzed in the 2002 Cle Elum UGA EIS?

A2. The 2002 Cle Elum UGA EIS provided environmental review of the elements listed below. Technical reports were prepared for several of these elements.

- Earth
- Air Quality
- Surface Water, Groundwater Water Supply
- Plants and Animals, Wetlands
- Noise
- Land Use, Plans and Policies
- Population and Housing
- Aesthetics, Light and Glare
- Cultural Resources
- Parks and Recreation
- Transportation
- Public Services
- Utilities
- Economic and Fiscal Conditions

The 2002 Cle Elum UGA EIS analyzed five alternatives:

- Alternative 1 – No Action
- Alternative 2 – Preliminary Master Site Plan
- Alternative 3 – Expanded Residential
- Alternative 4 – Reduced Residential
- Alternative 5 – Bullfrog Flats Subarea Plan, Mixed Use Zoning, and Master Site Plan Application

Q3. What significant approvals were granted for the Bullfrog Flats project?

A3. Alternative 5 from the UGA Final EIS was carried forward and the City of Cle Elum approved the following package of actions, plans, and documents in 2002:

- Annexaton of the Bullfrog Flats UGA to the City;
- Adoption of a Subarea Plan and Planned Mixed Use zoning;
- Master Site Plan approval; and,
- Execution of a Development Agreement.

Q4. Why is the 47° project being proposed?

A4. The 47° North proposal embodies the current Applicant's new vision for the site, and represents modifications to the approved Bullfrog Flats Master Site Plan in response to current market conditions, changes in conditions in the site area, and recent technical studies of the site and site vicinity. The Applicant determined that modifications are necessary and beneficial in order to accomplish their vision and objectives (see *Section 2.3*).

Q5. What is a SEIS and why is it being prepared?

A5. A Supplemental EIS (SEIS) is a document that supplements an EIS that was previously prepared for a proposal or alternative. According to the SEPA Rules (WAC 197-11-405(4)), an SEIS should be prepared if:

- There are substantial changes to a proposal such that the proposal is likely to have significant adverse environmental impacts; or,
- There is significant new information on a proposal's probable significant adverse impacts.

The City of Cle Elum concluded that the proposed revisions to the approved Master Site Plan constitute a "major amendment", as that term is defined in the Development Agreement. Because of the proposed changes, and the time that has passed since the original EIS was published, the City determined that an SEIS should be prepared to update all aspects of the 2002 Cle Elum UGA EIS, as necessary, to reflect the changes that have occurred. The SEIS will assess the potential environmental impacts and required mitigation measures associated with the proposed amendments to the approved Master Site Plan. The SEIS will also provide

the basis for amending the approved Development Agreement (or preparing a new Development Agreement) and modifying conditions of approval, as appropriate.

Q6. What Is Scoping and when is it required?

A6. "Scoping" means determining the range of proposed actions, alternatives, and impacts to be discussed in an EIS (WAC 197-11-793). Scoping is optional for a SEIS (WAC 197-11-620(1)), but the City elected to conduct scoping for the project because of the amount of time that has passed since issuance of the 2002 Cle Elum UGA EIS, changes that are proposed to the approved Master Site Plan, and to inform and engage the public.

On October 8, 2019, the City issued a Determination of Significance (DS) and Request for Comments on the Scope of the SEIS. The SEIS scoping period ended on October 29, 2019.

An SEIS public open house was held during the scoping period to offer an opportunity for the public to learn more about the Proposed Actions and to provide input on the scope of the SEIS. A total of 141 people signed in at the meeting that was held on October 23, 2019. Presentations were made by the City and the Applicant, and an extended question/answer period was provided.

A total of 591 comments were received from 127 commenters during the SEIS scoping period. All the comments are available for review at City of Cle Elum. **Appendix A** of the Draft SEIS includes a report containing a detailed summary of the SEIS scoping process, comments received during the scoping period, and any revisions to the SEIS scope based on public input received through the scopng process.

Q7. What are the elements of the environment evaluated in this SEIS?

A7. The City determined that the SEIS will review, update, and reevaluate the analysis for *all* SEPA elements of the environment that were considered in the 2002 Cle Elum UGA EIS (see *A2* above). The City also added the issue of greenhouse gas emissions to the SEIS. Two other elements of the SEIS analyses will be modified or expanded: the transportation analysis will include some modified intersections compared to those studied in the 2002 Cle Elum UGA EIS; and, the water resources analysis will include additional investigation for streams onsite.

Q8. What are the SEIS Alternatives evaluated in this SEIS?

A8. The SEIS evaluates the following alternatives:

- **SEIS Alternative 5 – Approved Bullfrog Flats Master Site Plan (No Action)**. FEIS Alternative 5 was carried forward and the Master Site Plan and several other actions approved by the City of Cle Elum. SEIS Alternative 5 represents

the approved Bullfrog Flats Master Site Plan that has been updated to reflect current conditions and regulations.

SEPA requires that a "No Action" alternative be reviewed in an EIS/SEIS. No action, in the current context, means that the City would not take action on the 47º North proposal, but it does not mean that absolutely nothing would happen on the site. The currently approved Bullfrog Flats Master Site Plan could still be developed by New Suncadia, subject to the existing Development Agreement. It is noted that the existing Development Agreement terminates in 2027 and would need to be extended by mutual agreement of the parties to enable development past that date. Because SEIS Alternative 5 is intended to facilitate comparison with the revised Master Site Plan proposal, however, it is assumed for purposes of analysis that development of SEIS Alternative 5 would build out over the same 30-year period and with the same types and amounts of land uses identified in the Bullfrog Flats FEIS and approvals.

Continuation of existing site conditions – no development – was also considered as a possible "no action" alternative but was eliminated from study in this SEIS. This scenario would simply continue existing conditions (the affected environment), which are described in the SEIS. In addition, a "no development" scenario would not be realistic or reasonable given that the property is approved for development and is being marketed by the owner. Therefore, SEIS Alternative 5 – Approved Bullfrog Flats Master Site Plan is used to represent the No Action Alternative in this SEIS. Changes to the affected environment that have occurred since 2002 are also described in the SEIS.

- **SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment**

SEIS Alternatives 5 and 6 will be compared to the Original Bullfrog Flats Master Site Plan (FEIS Alternative 5) and to each other in this SEIS.

Q9. When will an application been submitted to the City for the 47° North proposal?

A9. The City of Cle Elum is preparing the SEIS at the earliest possible point in the planning and decision-making process, when the principal features of the proposal and its environmental impacts can be reasonably identified, as encouraged by SEPA (WAC 197-11-055(2)). The proposal described in the SEIS is based on pre-application materials (included on the City's website) and additional information requested by the City and provided by the Applicant to meet the needs of environmental review. The formal 47° North application to revise the approved Master Site Plan will be submitted after the Final SEIS is issued, so that it can incorporate changes, if necessary, to address identified impacts and mitigation measures. The application will follow the City's adopted procedures, which include determining completeness,

determining consistency with policies and regulations, publishing notice of the application, and providing opportunities for public comment.

Q10. What will occur after the Draft SEIS is issued and what will the Final SEIS include?

A10. The 47° North Draft SEIS has been published by the City of Cle Elum for public review and comment. The City reviewed and considered all comments received from agencies, tribes, and the public and identified any changes to the Master Site Plan that required further environmental review. This Final SEIS includes responses to comments received on the Draft SEIS, additional/updated analysis of environmental impacts in certain areas (e.g., transportation, cultural resources, utilities, plants and animals, and fiscal economic conditions), and updated mitigation measures. The Draft and Final SEISs together comprise the SEIS document that the City will use – along with other analyses and public input – to make decisions on the proposed revisions to the Master Site Plan and Development Agreement. The SEIS mitigation measures will provide the basis for proposed conditions of approval. The Draft and Final SEISs will accompany the project application through the land use review and approval process and will provide information that the decision makers will use to decide whether or not to approve proposed changes to the Master Site Plan, and to determine what conditions should be required if the proposal is approved. The SEIS itself does not require approval or certification and is not a decision.

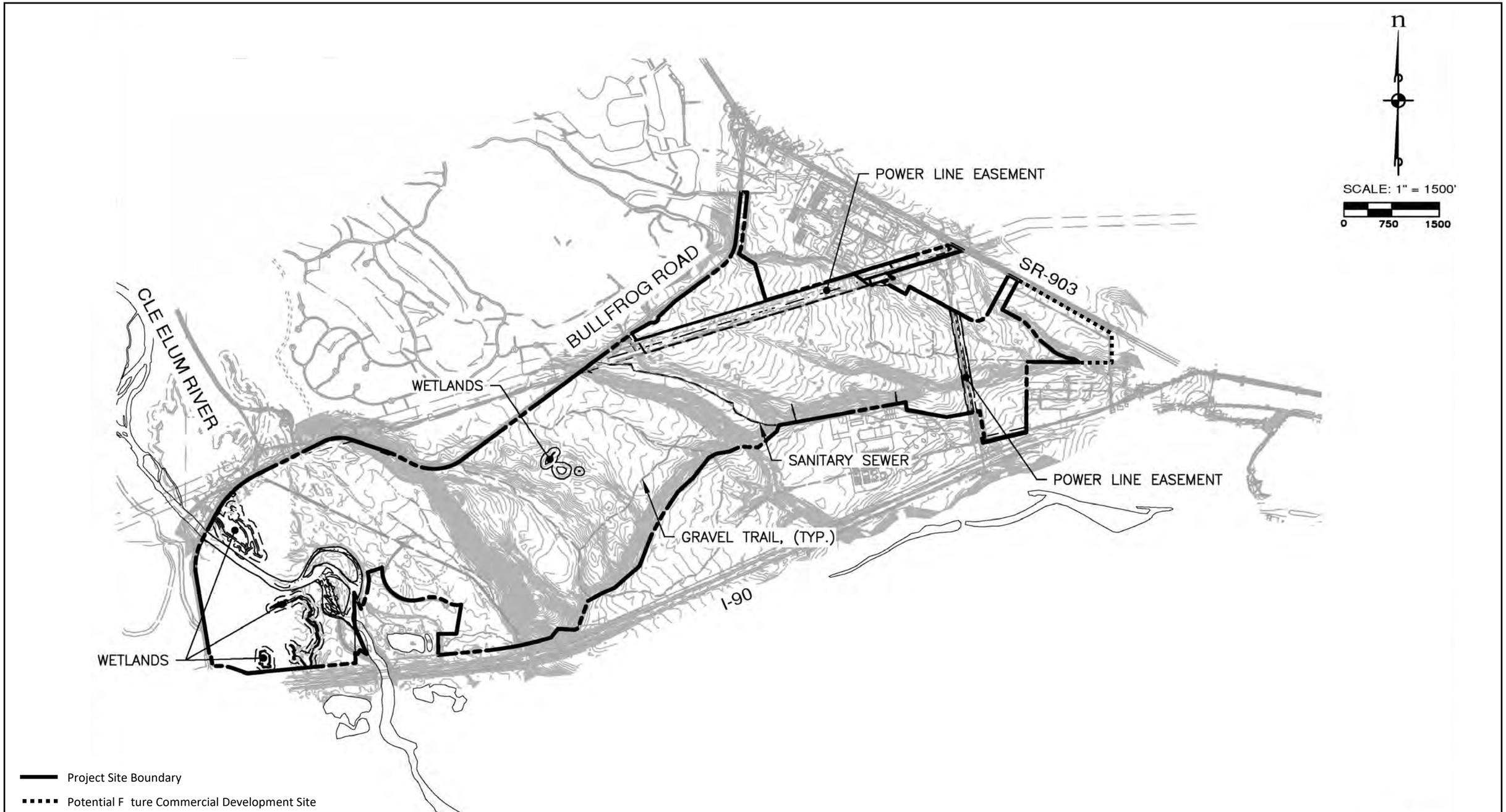
Q11. What will occur after the Final SEIS is issued?

A11. The review process for the proposal is set forth in the City Code (CEMC 17.100.100). The application for the project will be reviewed by the City of Cle Elum Development Review Team. The City Planner will prepare a Staff Report evaluating the consistency of the proposal with applicable policy and regulatory requirements, which will be transmitted to the City of Cle Elum Planning Commission. The Planning Commission will hold an open record public hearing and will make a formal recommendation to the City Council. The recommendation will be to deny, approve, or approve with additional conditions or modifications, the application for modifications to the Master Site Plan. The City Council will hold a closed record public hearing and will make a decision on the application. The City Council will also consider the Development Agreement.

2.5 SUMMARY OF EXISTING SITE CONDITIONS

Existing Natural Environment

Existing site conditions are shown in **Figure 2-3**. The site is comprised of three relatively level to gently rolling topographic areas that are separated from each other and from



Source: ESM Consulting Engineers, 2020.

Figure 2-3

Existing Site Conditions

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surrounding areas to the south by steep slopes that are from 50 to 150 feet high. The Cle Elum River flows through the westernmost portion of the site and joins the Yakima River about one mile to the south. Six wetlands have been identified onsite. The site is largely covered by second and third growth forests; shrub and grassland are present in the electrical transmission line easements that pass through the site (see DSEIS Section 3.1, **Earth**, 3.2, **Water Quantity & Quality**, and 3.3, **Plants, Animals, & Wetlands**, and FSEIS **Chapter 3**, Section 3-6**,** for details).

Existing Built Environment

Land Use

Currently, the site is largely undeveloped, vacant land. Horseback riding, hiking, and snowmobiling occur on dirt roads throughout the site (easements are in place for use of the site and certain trails by the Horse Park to the south). A few equestrian facilities, such as a small building, parking area, and load/unload areas, are located onsite. Puget Sound Energy (PSE) and Bonnevile Power Administration (BPA) electrical transmission lines/easements traverse the site: one runs north/south near the site's eastern boundary, the other extends east/west near the site's northern boundary; other utility easements are also present (see DSEIS Section 3.6, **Land Use**, for details).

Existing Utilities

Water

The site is in the City of Cle Elum's water service area. In 2002, a 12-acre parcel for a water treatment plant was part of the Cle Elum UGA/Bullfrog Flats property and was dedicated to the City; in 2004, the water treatment plant was built. The capacity of this plant is currently 6 million gallons per day (gpd) with room for expansion to 8 million gpd. The Bullfrog Flats project was planned to be served by this treatment plant.

There are four available points of water service connection located near the site: two 12-inch diameter treated water lines that supply the water tank (one to the north and one to the south of the PSE easement), an 8-inch diameter City water supply line (that flows from the water treatment plant towards Cle Elum), and a 16-inch diameter water main stub-out (on Douglas Munro Boulevard).

Sewer

The site is in the City of Cle Elum's sewer service area. In 2005, the City completed construction of a new 3.6 million gpd Wastewater Treatment Plant (WWTP). Treatment facilities were designed to handle a planned 30-year build out, including capacity to accommodate development of the Bullfrog Flats property.

An existing sewer trunk system network traverses the site. This existing system consists of a 21-in. diameter sewer main that follows Douglas Munro Boulevard (Ranger Station Road) and then splits into an 18-in. diameter sewer main to the west and a 15-in. diameter sewer main to the north.

Stormwater

Approximately 60% of the site is located within the Yakima River basin and approximately 40% within the Cle Elum River basin. Because of the nature of surface soils onsite, natural drainage occurs through infiltration and subsurface groundwater flow. There are little if any impervious surfaces and existing stormwater management facilities onsite.

Solid Waste

Solid waste collection in the site vicinity is presently provided by Waste Management of Ellensburg. Wastes are hauled to the Cle Elum Transfer Station prior to transport to the Ryegrass Land Fill for final disposal.

Energy

PSE provides electricity and natural gas to the site vicinity. As noted above, two electric transmission lines/easements pass through the site.

(See DSEIS Section 3.14, **Utilities**, and FSEIS **Chapter 3**, Section 3-4, for details.)

Comprehensive Plan, Zoning, & Shoreline Designations

The site is located in the City of Cle Elum and is designated on both the Future Land Use Map and the Official Zoning Map as "Planned Mixed Use". The shoreline designation of the site adjacent to the Cle Elum River is "Natural" (see DSEIS Section 3.6, **Land Use**, and Section 3.7, **Relationship to Plans and Policies**, for details).

2.6 DESCRIPTION OF PROPOSED ACTIONS & ALTERNATIVES

2.6.1 Proposed Actions

The Proposed Actions for the 47° North Project include:

- Major Amendment to Bullfrog Flats Master Site Plan approval by the City;
- Planned Mixed Use approval by the City;
- Binding Site Plan and/or subdivision approval by the City;
- Revised or new Development Agreement between the City, the Applicant, and possibly Suncadia; and,
- Local, state, and federal permit approvals required for construction and development of the project.

2.6.2 SEIS Alternatives

Two alternatives have been identified for study in this SEIS: SEIS Alternative 5, the Approved Bullfrog Flats Master Site Plan, and SEIS Alternative 6, the Proposed 47° North Master Site

Plan Amendment (the Applicant's proposal). Both of the SEIS Alternatives are compared to FEIS Alternative 5, the Original Bullfrog Flats Master Site Plan from the 2002 Cle Elum UGA EIS to help show relative changes in impacts. SEIS Alternative 5 is FEIS Alternative 5, carried forward and approved as the Bullfrog Flats Master Site Plan, and updated to reflect current conditions and regulations. **Table 2-1** provides a land use summary of the alternatives. See **Figure 2-4**, Original Bullfrog Flats Master Site Plan – FEIS Alternative 5, **Figure 2-5**, Approved Bullfrog Flats Master Site Plan – SEIS Alternative 5, and **Figure 2-6**, Proposed 47° North Master Site Plan Amendment – SEIS Alternative 6. Further descriptions of the SEIS Alternatives are provided below.

2.6.2.1 SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment

The Proposed 47° North Master Site Plan Amendment (SEIS Alternative 6) represents the Applicant's proposed revisions to the approved Bullfrog Master Site Plan. It features development of a mix of residential, RV resort, and open space/recreational facilities on the 824-acre site. The site would be developed in four major phases over an approximate 7-year period, beginning in 2021. A 25-acre property adjacent to the site owned by Suncadia could potentialy be developed in commercial uses in the future over an approximate 17-year period, possibly beginning in 2021. This commercial land use is not proposed and not part of the proposed Master Site Plan; it is included for purposes of analysis. Details on SEIS Alternative 6 follow.

Proposed Land Uses

Residential

SEIS Alternative 6 would provide 707 single family and multi-family residential units on 143.3 acres of the site. A 6.8-acre site for affordable housing would also be dedicated to the City. Further description of these proposed residential uses follows.

Single Family Housing

Construction of the proposed single family housing is scheduled to begin in 2021 and all the single family housing units would be ready for lease/sale in 2028. A total of 527 single family residential units would be developed in six neighborhoods on 124.7 acres[3] in the eastern portion of the site (SF-1 through SF-6; see **Table 2-2**). The single family residential units would be manufactured housing on approximately 5,500 to 7,000-sq. ft. unplatted lots. At

[3] The 124.7 acres represents gross acreage.

Table 2-1
LAND USE SUMMARY – FEIS & SEIS ALTERNATIVES

	FEIS Alt. 5		SEIS Alt. 5		SEIS Alt. 6	
	Acres	Units	Acres	Units	Acres	Units
Residential Uses						
Single Family	213	810	165	810	124.7	527
Multi-Family	78	524	56	524	18.6	180
RV Resort	---	---	---	---	145.6	627
Affordable Housing Site	---	---	7.5	(50)[2]	6.8[1]	---[1]
Subtotal	**291**	**1,334**	**228.5**	**1,334[2]**	**295.7**	**1,334**
Non-Residential Uses						
Neighborhood Clubhouse & Lake (Amenity/Adventure Ctrs.)	22		18		16.9[3]	
Recreation Expansion	11		10.5		---[4]	
Business Park and/or Commercial (Retail & Professional Office)	80		75		(25.4)[6]	
Subtotal	**113**		**103.5**		**42.3**	
Other Uses						
Community (Municipal) Recreation Center	12		12[1]		---[1]	
School Expansion Site	35		35		---[5]	
Cemetery Expansion Site	10		10[1]		13.4[1]	
Water Treatment Plant Site	12		12		---[5]	
Reserve: Horse Park, Open Space, Buffer	175[7]		175[7]		---[7]	
Maintenance Area	2		---		---	
Connector Road	---[8]		--[8]		9.5	
Subtotal	**246**		**244**		**9.7**	
Open Space						
Undeveloped Open Space	287		246		436.1[9]	
Steep Slope Areas/Buffers	126		172		---[10]	
Wetlands/Buffers	---[11]		---[11]		3.4	
Powerline Right of Way	37		37		37.2	
Residential Buffers	---		69		---[12]	
Subtotal	**450**		**524**		**476.7**	
TOTAL	**1,100**	**1,334**	**1,100**	**1,334[2]**	**812.2**	**1,334[2]**

Source: 2002 Cle Elum UGA EIS; 2002 Approved Bullfrog Flats Master Site Plan; Sun Communities, 2020.

[1] No development of the affordable housing and cemetery sites are assumed at this time under SEIS Alt. 6. The DSEIS studies the general developability of thes sites; further SEPA review will be required when development plans are submitted to the City of Cle Elum. The City and New Suncadia recently reached an agreement related to the municipal/community recreation center. This agreement, which is now being implemented, provides for transfer of title to the recreation center site and payments to support construction of a facility. As such, the Proposed 47° North Master Site Plan Amendment no longer includes the 12.2-acre recreation center site.

[2] The affordable housing units are not included in the total residential unit count under SEIS Alt. 5 or 6.

[3] No created lakes would be included under SEIS Alt. 6.

[4] The recreation expansion site under FEIS and SEIS Alt. 5 is in the same location as the 6.0-acre Adventure Center under SEIS Alt. 6, which is included under the Neighborhood Clubhouse and Lakes category in this table.

[5] The school expansion and water treatment sites have been dedicated to the Cle Elum Rosyln School District and City of Cle Elum, respectively. Therefore, these areas are not included under SEIS Alt. 6.

[6] The commercial development is not included in the SEIS Alt. 6 site area as the site is currently owned and will be retained by New Suncadia. However, future possible development of this property is evaluated in this SEIS to assess possible cumulative impacts.

[7] The reserve area consists of: the Horse Park (112 acres) to the south of the 47° N site, open space between the Horse Park and the 47° site (55 acres), and the buffer along I-90 (8 acres). These areas are included in SEIS Alt. 5, but not in SEIS Alt. 6 because they were either dedicated to the City (i.e., the Horse Park) or retained by New Suncadia (i.e., the open space and buffer).

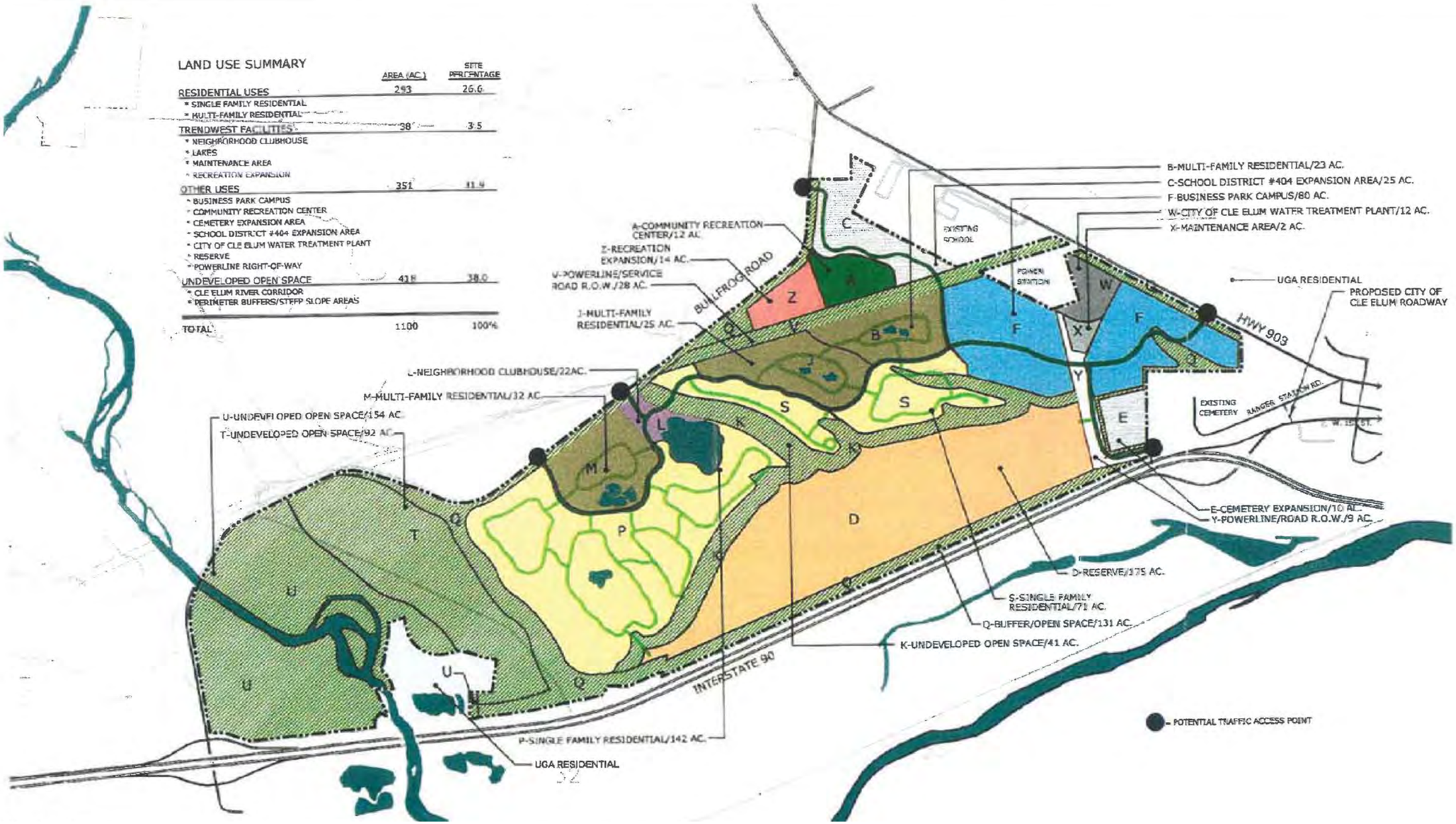
[8] The acreage of the connector road is incorporated into the other developed areas under SEIS Alt. 5.

[9] The undeveloped open space under Alt. 6 includes: River Corridor Open Space (160.0 acres), Managed Open Space (103.9 acres), and Natural Open Space (172.2 acres). The River Corridor Open Space and Managed Open Space are subject to easements granted to Kittitas Conservation Trust.

[10] The steep slope areas and the buffers in RV-1 are included in the calculation of undeveloped open space under SEIS Alt. 6; additional wertlands/buffers other wetlands/buffers are included in the River Corridor Open Space.

[11] The wetlands/buffers are included in the undeveloped open space under SEIS Alt. 5.

[12] While some unquantified amount of vegetation would be preserved/provided in the residential areas under SEIS Alt. 6, these areas are not included in the open space area calculations.



Note: This figure is not to scale

Source: City of Cle Elum, 2002.

Figure 2-4

Original Bullfrog Flats Master Site Plan—FEIS Alternative 5

LAND USE SUMMARY

RESIDENTIAL USES	AREA (Acres)	Quantity Proposed
Single Family Residential	165	810 Units
Multi-Family Residential	56	524 Units
Affordable Residential	7.5	*
Subtotal	228.5 (20.8%)	1334 Units
NON-RESIDENTIAL USES: Trendwest Facilities		
Neighborhood Clubhouse & Lake	18	
Recreation Expansion	10.5	
Subtotal	28.5 (2.6%)	
OTHER USES		
Community Recreation Center	12	
School Expansion	35	
Cemetery Expansion	10	
Business Park	75	950,000 SF
Water Treatment Plant	12	
Reserve	175	
Subtotal	319 (29.0%)	
OPEN SPACE		
Undeveloped Open Space	246	
Buffers / Steep Slope Areas	172	
Powerline R.O.W.	37	
Residential Buffers	69	
Subtotal	524 (47.6%)	
Total	1100 (100%)	1334 Units

* 50 Units of Affordable Housing not included in total units

RESIDENTIAL USES

Housing Type	Gross Acreage (Acres)	Approximate Unit Yield	Density (Dwelling Units Per Acre)
Single Family			
Parcel P-1	30.1	120	2-5 DU/Acre
Parcel P-2	39.3	184	2-5 DU/Acre
Parcel P-3	19.4	118	3-7 DU/Acre
Parcel P-4	31.1	144	3-7 DU/Acre
Parcel S-1	17.7	96	3-7 DU/Acre
Parcel S-2	27.4	148	3-7 DU/Acre
Multi-Family			
Parcel B	17.3	150	8-15 DU/Acre
Parcel J	17.6	164	8-15 DU/Acre
Parcel M	21.1	210	8-15 DU/Acre
Affordable			
Parcel A	7.5	*	5-8 DU/Acre
Total	228.5	1334	2-15 DU/Acre

* 50 Units of Affordable Housing not included in total units



Source: City of Cle Elum, 2002.

Figure 2-5

Approved Bullfrog Flats Master Site Plan—SEIS Alternative 5



Source: ESM Consulting Engineers, 2020.

Figure 2-6

Revised Master Plan - SEIS Alternative 6

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buildout, the net density in the single family area would be 5.6 du/acre.[4] (See *Residential/Lease/Ownership Structure* and *Project Design & Construction* later in this section for further details on the single family housing.)

Table 2-2
SINGLE FAMILY HOUSING - SEIS ALTERNATIVE 6

	Acres	Units
Parcel SF-1	17.1	73
Parcel SF-2	23.2	103
Parcel SF-3	28.5	133
Parcel SF-4	23.7	108
Parcel SF-5	15.9	44
Parcel SF-6	16.3	66
Total	**124.7**	**527**

Source: ESM, 2020.

Multi-Family Housing

Construction of the proposed multi-family residential units is scheduled to begin in 2021 and all the multi-family housing units would be ready for lease in 2024. A total of 180 multi-family residential units would be developed in one 18.6-acre[5] area in the northeastern portion of the site (M-1). The multi-family housing is planned to consist of three units each on 8,000-sq. ft. unplatted lots. At buildout, the net density in the multi-family area would be 12.6 du/acre.[6] (See *Residential/Lease/Ownership Structure* and *Project Design & Construction* later in this sectionfor further details on the multi-family housing.)

Affordable Housing

An 6.8-acre property located in the southeastern portion of the site would be reserved for dedication to the City of Cle Elum for future development of affordable housing. It would be developed and managed by a non-profit entity in the future. The Applicant could also develop the affordable housing. No specific development is proposed/assumed on the property at this time. This SEIS analyzes the general developability of the affordable housing property (e.g., the presence of any constraints for development, such as critical areas); additional SEPA review will be required when specific development is proposed on the property. Potential residential units developed on the site are not included in the units calculations for 47º North.

[4] Net density is calculated based on net acreage, calculated as gross acreage with a 25% allowance for roads and utility rights of way.
[5] The 18.6 acres represents gross acreage.
[6] Ibid., 3.

Residential/Lease/Ownership Structure

Sun Communities retains ownership of the underlying land in all of its projects, and the company leases individual home sites to purchasers and renters. Individual residential lots would not be platted or otherwise divided and would not be separate tax parcels, and technically would not have surveyed property boundaries. However, the Master Site Plan identifies "virtual" lot lines for all proposed single family units, and these will be viewed by the City as if they were platted lots and will be used to determine consistency with zoning and other regulatory requirements, including lot size, setbacks, and yards. Sun Communities would also use the virtual lot lines to determine and enforce homeowners' and renters' mainenance and other responsibilities.

In single family areas, residents would have the option to either buy or lease a manufactured home. If the home is owned by the resident, then Sun Communities would lease the lot to the homeowner. Initially, it is expected that approximately 50% of the single family units would be rentals, with an assumed 10% of the rented units being purchased each year. At full buildout, it is anticipated that an average of 10% of the single family homes would be rented (consistent with other communities in Sun Communities' portfolio) The land owned by Sun Communities could be maintained by the homeowner or by Sun Communities, which would be specified by contract. If the home is leased, Sun Communities would own the home as well as the land that it sits on, and the tenant would be responsible to pay Sun Communities according to the lease terms for use of the home and lot. These would typically be one-year leases. All the multi-family homes would be leased and Sun Communities would maintain all the leased lots.

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

Recreational Vehicle (RV) Resort

The RV resort would feature 627 sites located in two areas totaling 145.6 acres in the central portion of the site (RV-1 and REC-1). RV-1 would feature traditional pull-through and back-in RV sites, as well as various forms of "glamping," a term that blends glamorous and camping. Glamping is defined in the industry as a style of camping with resort-type amenities; units may include yurts, safari tents, and airstream trailors; and it is typically

more luxurious than "traditional" style camping. Approximately 70% of the RV sites (439 sites) could be located in RV-1; the remaining 30% of the RV sites (188 sites) could be located in REC-1. REC-1 would be limited to glamping, including the potential for placement of park models[7] and/or airstreams. Over-the-road RVs would not be included in this area. The glamping units in REC-1 would be dispersed in clusters. For analysis purposes in this SEIS, it is assumed that there would be an equal distribution of the different types of glamping sites in REC-1. For example, ¼ (47) of the sites could accommodate yurts, ¼ (47) safari tents, ¼ (47) airstream trailers, and ¼ (47) park models. Other uses in REC-1 would be focused on recreational facilities and would include a mix of parks, playground, trails, sport courts, dog parks, mountain bike trail, outdoor exercise facilities, and outdoor gathering space. Construction of the proposed RV resort is scheduled to begin in 2021; it would be constructed in approximately equal increments and would be completed in 2025.

Seasonal passes to the RV resort would be for sale and would allow a stay of up to nine months (note that the resort would continue to operate year-round). The pass would allow guests to come and go from the resort as they please, allowing them to leave their RV on the premises for the duration of the pass. It is the Applicant's experience that these passes are typically used by guests commuting from neighboring cities on the weekends and they are not occupied continuously. The RV sites are intended to be for vacationing use only, not to be used for permanent housing. Under no circumstance would any guest be permitted to use the RV resort as a permanent residence, and no address or mailing address would be assigned to any guest in the resort. As a part of the seasonal agreement, guests would need to agree to RV resort guidelines to ensure compliance with various rules and regulations.

Traditional wood campfires using wood for fuel would be prohibited in the RV resort, but individual and common area propane campfires would be permitted. These provisions would help to reduce potential wildfire dangers from campfires.

RV Resort Lease/Ownership Structure

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. As mentioned previously, 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 calender year. For analysis purposes in this SEIS, a 50% average occupancy (which takes into account daily and yearly occupancy) and three people per site are assumed for the RV resort.

[7] 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 residences. 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.)

Commercial Development

A 25.4-acre property located off-site, adjacent to the site's eastern boundary, could be developed by New Suncadia for commercial uses at some point in the future. No development is proposed on the property at this time, and the commercial site and development is not part of the proposed Master Site Plan. Hypothetical development of the property is studied in this SEIS in order to understand the potential impacts of this development, including the cumulative impacts of the development together with development of 47° North and other vested projects in the City. While speculative, the development assumptions for the commercial site are listed in **Table 2-3**. As shown, a total of 150,000 sq. ft. of commercial uses could be developed in phases on approximately 18 acres of the property and could include a grocery store, other retail stores, restaurants, and medical offices. A conceptual site plan has been developed to indicate a potential site layout and the size and location of buildings. These uses could occur on lots of from 75,000 to 150,000 sq. ft. A total of 790 parking spaces could be provided. However, as stated, no commercial development is proposed at this time.

Table 2-3
FUTURE COMMERCIAL DEVELOPMENT ASSUMPTIONS – SEIS ALTERNATIVE 6

Potential Development	Development Assumptions
Grocery Store	45,000 sq. ft.
Retail	25,000 sq. ft.
Restaurant	20,000 sq. ft.
Medical Offices	60,000 sq. ft.
Total Potential Development	**150,000 sq. ft.**
Developable Area[1]	18 acres
Potential Parking	790 spaces

Source: New Suncadia, 2020.

[1] Area that is not constrained (e.g., by critical areas such as steep slopes).

(See **Table 2-1**, **Figure 2-6,** and **Figure 2-7**, Commercial Development Conceptual Site Plan.)

Cemetery Expansion

A 13.4-acre property located in the southern portion of the site, to the west of the existing Laurel Hill Memorial Park cemetery would be reserved for future expansion of the cemetery; no development is proposed on the property at this time. The property would ultimately be dedicated to the City of Cle Elum. The SEIS analyzes the general developability of the cemetery property (e.g., the presence of constraint for development, such as critical



Note: No commercial development is proposed on the adjacent 25-acre property at this time. This conceptual site plan represents a possible layout of land uses that could be built on the property in the future.

Source: ECONorthwest, 2020.

Figure 2-7

Future Commercial Development Conceptual Site Plan

areas); additional SEPA review will be required when specific development is proposed. (See **Table 2-1** and **Figure 2-3**.)

Project Design & Construction

The character of the overall development is intended by the Applicant to largely respond to the site's natural setting. By preserving large areas of open space around the Cle Elum River, wetlands, forested slopes, and other natural features, the development is meant to blend into the existing wooded landscape. Architectural design and materials guidelines would be established for the residential and recreational structures. These design guidelines would be based on those developed for other communities operated by the Applicant, but would be specifically tailored for 47° North.

Residential & Recreational Building Design & Construction

Table 2-4 presents the design characteristics and construction technique that would be used for the proposed residential and recreational buildings onsite. As shown, the buildings would vary from 1,000 sq. ft. (single family homes) to 11,000 sq. ft. (clubhouse) in size; would not exceed 50 feet in height; would be designed in contemporary to modern styles (housing) and Pacific NW contemporary mountain style (recreational buildings); and, would be a combination of manufactured units (all the single family and some of the multi-family housing), conventional stick-built construction (some of the multi-family housing and the recreational buildings), and stacked modular units (some of the multi-family housing). The precise mix of construction types for the multi-family housing has not been determined. Also see **Figure 2-8**, Single Family Residential Design Examples, **Figure 2-9**, Multi-Family Residential Design Examples, **Figure 2-10**, Park Model RVs Design Examples, and **Figure 2-11,** Recreational Building Design Examples.

Table 2-4
HOUSING & RECREATIONAL BUILDING DESIGN/CONSTRUCTION – SEIS ALTERNATIVE 6

Building Type	Size (sq. ft.)	Max. Ht. (ft.)[1]	Architectural Style	Construction Type
Single Family	1,000 - 2,000	20	Contemporary to Modern	Manufactured
Multi-Family	600 - 1,200	50	Contemporary to Modern	Manufactured (1-story bldgs.); & Conventional Stick-built or Modular Units Stacked (2- and 3-story bldgs.)
Adventure Center	3,500	50	Pacific NW Contemporary Mountain	Conventional Stick-built
Amenity Centers - Clubhouse - Spa/Fitness - Recreation/Game Ctr. - Registration/Welcome Ctr.	 11,000 5,500 10,500 4,000	50	Pacific NW Contemporary Mountain	Conventional Stick-built

Source: Atwell, 2020.

[1] Measured to the top of the roof peak. Note that the three-story multi-family units would have pitched roofs to reach the 50-foot maximum height.









Note: These are examples of single family residential buildings from other Sun Communities developments with designs that are similar to what could be constructed in 47º North.

Source: Atwell, 2020.

Figure 2-8

Single Family Residential Design Examples





Note: These are examples of multifamily residential buildings from other Sun Communities developments with designs that are similar to what could be constructed in 47º North.

Source: Atwell, 2020.

Figure 2-9

Multifamily Residential Design Examples





Note: These are examples of park model RV designs from other Sun Communities developments with designs that are similar to what could be constructed in 47º North.

Source: Atwell, 2020.

Figure 2-10

Park Model RV Design Examples



Note: These are examples of recreational buildings from other Sun Communities developments with designs that are similar to what could be constructed in 47º North.

Source: Atwell, 2020.

Figure 2-11

Recreational Building Design Examples

The manufactured homes would be built in an off-site factory according to specifications/standards that would meet U.S. Department of Housing and Urban Development (HUD) requirements.[8] The homes would be constructed in one or two components of varying length, from 14 to 16 feet wide. The process of construction would begin with placement of an order by representatives of Sun Communities for materials to meet the requirements of the home. Once materials to assemble the homes are delivered to the factory, the units would be built and shipped from the factory generally in less than two weeks. Once they are shipped, they could be installed and completed onsite within 30 to 60 days (including placing the units on foundatations, and installing plumbing and electricity), depending on the complexity of the home and the on-site work necessary. Numerous interior layouts and exterior finishes would be offered. The proposed finishes would be in muted earth-tone colors (e.g., primarily browns, greys, and greens) to blend with the landscape. The materials used in the manufacturing of the home would match those of a typical stick-built home including roofing, plumbing, and electrical. (See **Figure 2-8.**)

Commercial Building Design & Construction

Table 2-5 presents the assumed design characteristics and construction techniques that could be used for the potential future commercial buildings. As shown, the building floor area ratios (FARs)[9] could vary from 0.12 (restaurants) to 0.35 (grocery store and medical offices); the individual buildings could vary in size from 8,500 sq. ft. (restaurants) to 45,000 sq. ft. (grocery store); the buildings are not expected to exceed 40 feet in height (medical offices). A total of from approximately 5 to 16 buildings could be built; seven representative buildings are shown on the conceptual site plan. The buildings are expected to be constructed using wood frame and tilt-up methods

Table 2-5
FUTURE COMMERCIAL BUILDING DESIGN/CONSTRUCTION – SEIS ALTERNATIVE 6

Building Type	FAR	Max. Individual Bldg. (sq. ft.)	Max. Ht. (ft.)	Number of Bldgs.	Construction Type
Grocery Store	0.35	45,000	35[1]	1	Wood Frame & Tilt-up
Retail	0.20	30,000	15[1]	1 - 5	Wood Frame & Tilt-up
Restaurant	0.12	8,500	25[1]	2 - 6	Wood Frame
Medical Office	0.35	20,000	40[1]	1 - 4	Wood Frame & Tilt-up
Total				**5 - 16**	

Source: ECONorthwest, 2020.

[1] Measured to the top of the roofline.

[8] Manufactured homes are subject to HUD standards and not to the International Building Code (IBC).

[9] FAR is the ratio of a building's total floor area (gross floor area) to the size of the piece of land upon which it is built.

Phasing Plan

Residential & RV Resort Phasing

Figure 2-12, Phasing Plan – SEIS Alternative 6, depicts the anticipated phasing plan for the proposed project, and **Table 2-6** presents the phasing schedule. The phasing plan is approximate and could be modified in response to economic and market conditions. As shown, construction of the housing and RV resort is expected to begin in 2021. It is assumed that the number of units of each type would be spread approximately evenly among the phases (e.g., 1/2 the multi-family units would be constructed in 2022 and 1/2 in 2024). All the multi-family housing units would be ready for lease in 2024, all the RV resort sites would be ready for occupancy in 2025, and all the single family manufactured housing units would be ready for lease/sale in 2028.

Table 2-6
47º NORTH RESIDENTIAL & RV RESORT PHASING – SEIS ALTERNATIVE 6

Phase	Manufactured Housing			Multi-Family Housing			RV Resort		
	Start	Finish	Units	Start	Finish	Units	Start	Finish	Units
I	2021	2022	132	2021	2022	90	2021	2022	157
II	2023	2024	132	2023	2024	90	2022	2023	157
III	2025	2026	132	NA	NA	---	2023	2024	157
IV	2027	2028	131	NA	NA	---	2024	2025	156

Source: Sun Communities, 2020.

Commercial Development Phasing

As mentioned previously, there are no current plans by New Suncadia to develop the off-site commercial property; therefore, any schedule for development is uncertain and speculative. Development timing would depend on future economic and market conditions, which are unknowable. In addition, the current Development Agreement for Bullfrog Flats substantially limits commercial development onsite, and this condition would need to be revised to permit a broader range and level of commercial development. However, assumptions about uses and development timing have been made for SEIS analysis purposes.

Table 2-7 presents a possible phasing plan for future commercial development. A major consideration in development timing is to allow a residential population to be established on the site to help support future commercial development, particularly the grocery store. Timing has also been aligned with the analysis years established for the transportation analysis in this SEIS. Development could, in theory, occur somewhere between those analysis years. As shown, it is estimated that approximately 1/3 of the retail and restaurant uses could be developed between 2021 and 2025 (15,000 sq. ft.); the grocery store, and another approximately 1/3 of the retail and restaurant uses could be developed between 2026 and 2031 (60,000 sq. ft.); and, the remaining 1/3 of the retail and restaurant uses and all the medical offices could be developed between 2032 and 2037 (75,000 sq. ft.).



Source: ESM Consulting Engineers, 2020.

Figure 2-12

Phasing Plan--SEIS Alternate 6

Table 2-7
FUTURE COMMERCIAL DEVELOPMENT PHASING – SEIS ALTERNATIVE 6

Commercial Land Use	2025 (sq. ft.)	2031 (sq. ft.)	2037 (sq. ft.)	Total (sq. ft.)
Grocery	--	45,000	--	45,000
Retail	8,500	8,500	8,000	25,000
Restaurant	6,500	6,500	7,000	20,000
Medical Office	--	--	60,000	60,000
Total	**15,000**	**60,000**	**75,000**	**150,000**

Source: New Suncadia, 2020.

Open Space, Parks, & Recreation Facilities

Open Space

A total of 476.7 acres (58% of the site) is proposed to be retained as open space under SEIS Alternative 6. Categories of open space are shown in **Table 2-8**, followed by descriptions of the various types of open space.

Table 2-8
OPEN SPACE AREAS – SEIS ALTERNATIVE 6

Open Space Types	Acres
Natural Open Space	172.2
Managed Open Space	103.9
River Corridor Open Space	160.0
Wetlands and Buffers[1]	3.4
Power Easements	37.2
Total	**476.7**

Source: ESM, 2020.

[1] Only includes the three wetlands/buffers in RV-1; additional wetlants are located in the River Corridor Open Space.

Natural Open Space.

The 172.2-acre Natural Open Space area largely coincides with the steeper slopes on-site and could include passive and active recreation features like trails, gazebos, viewpoints, benches, outdoor gathering places, etc. It also includes the 100-foot wide natural buffer proposed along Bullfrog Road.

Managed Open Space

The 103.9-acre Managed Open Space area is located in the western portion of the site and is bound by an existing conservation easement granted by Trendwest to the Kittitas Conservation Trust in December 2006. The Managed Open Space is recognized as possessing open space, habitat, and recreational values (collectively conservation values).

The intended use is wildlife habitat and recreation. More intensive vegetation management is allowed in the Managed Open Space to establish better habitat and make it more useable for recreation. Casual recreation structures like picnic benches, rest areas, outlooks and exhibits; roads and trails; and, infrastructure crossings approved by the City are permitted in the Managed Open Space.

River Corridor Open Space.

The 160.0-acre River Corridor Open Space area is situated in the western portion of the site along the Cle Elum River and is bound by an existing covenant and easement. In July 2004, a covenant was established that permanently designated the Cle Elum River Corridor onsite as open space. In October 2004, a conservation easement for the River Corridor Open Space was granted by Trendwest to the Kittitas Conservation Trust. This open space is recognized as possessing scenic, cultural, natural resource, and recreation values (collectively conservation values). The intended use of the River Corridor Open Space is wildlife habitat and recreation. Minimal development and vegetation management is allowed. Interpretive, equestrian, and other casual recreation structures, and picnic facilities; permeable trails; and, infrastructure crossings approved by the City are permitted in the River Corridor Open Space. Access to this open space by the general public must be provided.

Wetlands & Their Buffers

Three wetlands and their buffers totaling 3.4 acres are located in potential development areas in RV-1. These wetlands/buffers would be protected pursuant to City regulations. Other wetlands and their buffers occur in the River Corridor Open Space area where development is largely prohibited by the existing conservation easement. Wetlands and buffers would be protected as well through placement in separate tracts and/or establishment of further easements.

Powerline Easements

A total of 37.2 acres of open space associated with two powerline easements is present onsite. The vegetation in these easements would be maintained in accordance with PSE and BPA requirements. Trails are proposed in the powerline easements.

Parks

Public and private parks are proposed as part of the project, as described below.

Public Trails Parks

Three public trail parks, each approximately 0.5-acre in size, would be provided: two in the Managed Open Space and one in the Natural Open Space. These parks could include gathering areas with seating, fitness/exercise equipment, and informative signs.

Community Parks

Two private community parks, each approximately 0.5-acre in size, would be provided: one in the single family area (SF-6) and one in the multi-family area (MF-1). These parks could include playgrounds, open/natural field areas, and sport courts.

The specific design of the parks will be evaluated as part of Master Site Plan review. (See **Figure 2-13**, Parks and Trails Plan – SEIS Alternative 6.)

Recreation Centers

The proposed project would include public and private recreations centers, as described below.

Adventure Center

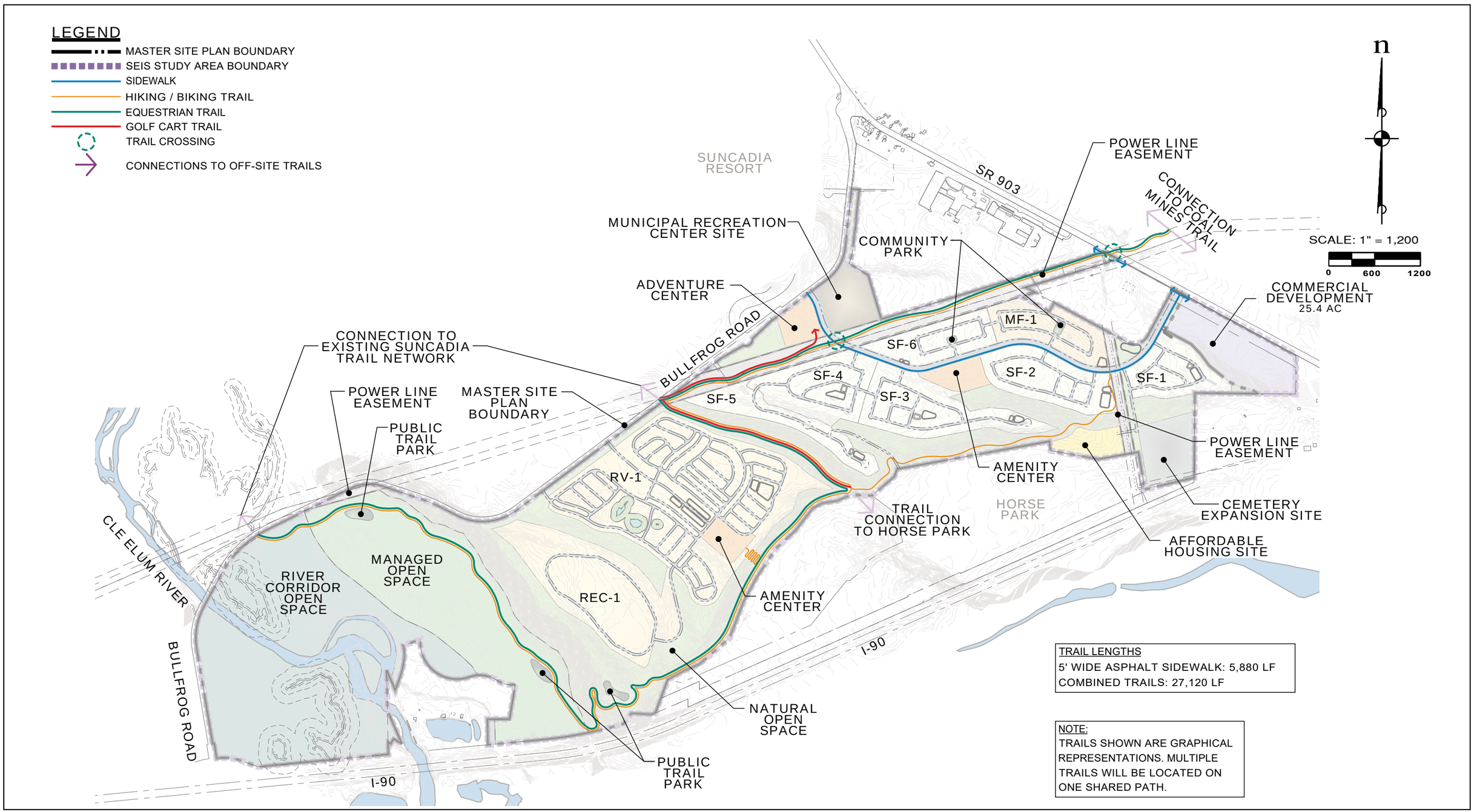
A 6.0-acre adventure center that would be open to residents and guests of 47° North, as well as to the general public for a fee, would be located in the northern portion of the site along Bullfrog Road. The adventure center would include: an 18-hole miniature golf course, outdoor laser tag, a ropes challenge course, a registration building, and parking.

Amenity Centers

Two private recreational amenity centers are proposed, one for residents in the single/multi-family area and the other for guests in the RV resort. A 6.0-acre amenity center in the residential area would be centrally located and would include: combined clubhouse and fitness building, pool, playground, sport courts, recreation lawn, and maintenance facility. A 5.0-acre amenity center in the RV resort would be located in the southern portion of the RV-1 area, and would include: clubhouse and fitness center complex (recreational building, arcade and bowling, restaurant and bar), pool and spa, and lawn/outdoor gathering area. 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.

Trails

An approximately 6-mile long network of trails and sidewalks would be provided throughout the site, including hiking/biking, equestrian, and golf cart paths. 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 located along one side of the on-site road connecting SR-903 and Bullfrog Road would also offer opportunities for non-motorized circulation. A total of approximately five miles of combined trails and one mile of sidewalks would be provided.



Source: ESM Consulting Engineers, 2020.

Figure 2-13

Parks and Trails Plan--SEIS Alternative 6

Golf cart paths would be made of asphalt or a compacted semi-impermeable material such as gravel. 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. All trails constructed by Sun Communities in the development and open space areas onsite would be owned and maintained by Sun Communities. Trails or specific courses that are permitted in the open space areas, approved by Sun Communities, and constructed by the Horse Park, would be maintained by the Horse Park. Any trails or trail connections constructed on property not owned by Sun Communities would not be maintained by Sun Communities. The specific design of the trails and trail connections will be evaluated as part of Master Site Plan review. (See **Figure 2-13**.)

Clearing, Grading, & Impervious Surface Areas

Proposed development of the 47° North Project under SEIS Alternative 6 would require clearing of approximately 315 acres (38% of the site). The clearing limits would extend to the appropriate critical area buffers/setbacks, in particular the area of regulated slopes. Selective clearing would take place on the slopes between RV-1 and REC-1 for the glamping units and roads/trails that could be placed on the slope (note that these are not considered steep slopes, as defined by the City; see DSEIS Section 3.1, **Earth**, for details). Approximately 18 acres could be cleared for the future commercial development on the adjacent approximately 25-acre property (72% of the property).

Proposed grading for the proposed project would match natural topography as much as possible. Grading for the project would include approximately 252,000 cubic yards (cy) of cut, and 308,000 cy of fill. Fill material, utility backfill, and road base would be imported from approved off-site sources. Approximately 99,000 cy of cut and 2,000 cy of fill could be required for future commercial development on the adjacent property.

With proposed development, approximately 149 acres (18% of the site) would be covered in impervious surfaces (e.g., rooftops, roadways, sidewalks, and parking areas). The future development of the commercial site would result in approximately 17 acres of impervious surface (68% of the commercial site)

(See DSEIS Section 3.1, **Earth**, and Section 3.2, **Water Quantity & Quality**, for details.)

Residents/Employees

The proposed 707 single- and multi-family residential units would house a total of approximately 1,489 residents, assuming an average occupancy of 90% and a household size of 2.34 person.[10] There would be an average of approximately 941 visitors per day at the RV resort; this assumes an average occupancy of 50%, and three people per vehicle, taking seasonal and weekly variations of visitors into account (a Saturday in July vs. a Wednesday in January).[11]

[10] Average occupancy and household size are based on U.S. Census Bureau, 2014-2018, American Community Survey, 5-year Estimates.

[11] RV resort occupancy rates and people per vehicle were provided by the Applicant.

The manufactured homes would be built in factories off-site – likely located in the Pacific NW – with approximately 90 to 130 employees operating in 10 to 15 different teams or stations (e.g., flooring, electrical, roofing, etc.). An additional 607 local construction jobs would be generated to assemble the homes and construct the other recreational buildings onsite, as well as other indirect construction jobs in the local area.

At full buildout of SEIS Alternative 6, it is estimated that Sun Communities would employ from 30 to 35 full time employees, 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.[12]

Future development of the commercial property could generate approximately 374 employees.[13]

(See DSEIS Section 3.8, **Housing , Population, & Employment**, and Section 3.15, **Economic & Fiscal Conditions**, for details about population and employment assumptions.)

Site Access & Circulation

Under SEIS Alternative 6, one access point would be provided from SR 903 (the primary entrance for the single/multi-family housing onsite and the future commercial development offsite, and three access points would be provided from Bullfrog Road (a secondary entrance for the single and multi-family housing, and primary and secondary entrances for the RV resort). Access to the adventure center and community recreation center site would be directly from Bullfrog Road. An access road would link SF-1 to the affordable housing site to provide for access to the future development. (See **Figure 2-6.**)

Connector Road

The proposed roadway network would consist of a main Connector road that would link Bullfrog Road and SR 903. This Connector road would be constructed by the Applicant but owned and maintained by the City. Currently assumed design features include the following:

- 40-foot wide road section (with two drive lanes and a center turn lane)
- 3-foot wide landscape strips on one side
- 21-foot wide landscape strip on one side
- 5-foot wide asphalt sidewalk on one side
- 70-foot total right-of-way width

Note that the design and alignment of the Connector road could be adjusted when a formal Master Site Plan application is submitted to the City. The Applicant is reviewing the SEIS transportation analysis to help determine the most appropriate design configuration,

[12] Resident and employment figures are based upon similar sized developments owned and managed by Sun Communities.
[13] Employees were estimated by ECONorthwest based on commonly-accepted assumptions.

considering access, travel patterns, and projected levels of use. These adjustments could include reducing the width of the lanes, lowering the speed limit, and other traffic calming measures, and could further discourage traffic from cutting through the project.

Private Roads

The internal roads that would be provided within the single family, multi-family, and RV resort would be privately owned and maintained by the Applicant, and would feature:

- 24-foot wide road section (with two drive lanes)
- 3-foot wide landscaped strips on both sides

Emergency Access Roads

Emergency access roads (e.g., between the single family residential area and the Horse Park) would be a minimum of 20-foot wide and would not include landscape strips.

(See **Figure 2-14**, Road Cross Sections – SEIS Alternative 6.)

Utilities

Water

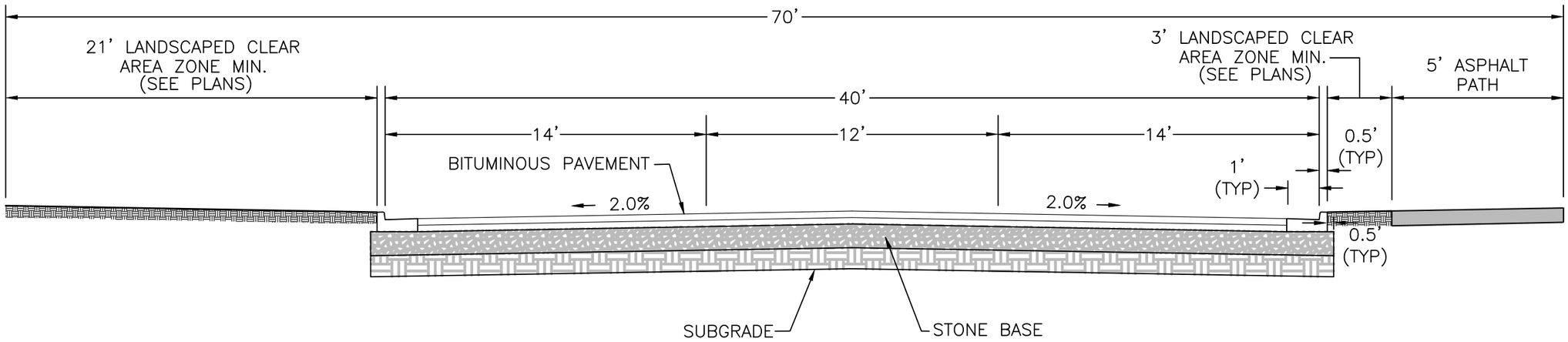
Water service for the project would be provided by the City of Cle Elum. Proposed single- and multi-family development, as well as the RV resort, would be part of a private Group A water distribution system owned by Sun Communities, and operated and maintained by a state-approved entity. It is anticipated that the single- and multi-family residential area, the RV resort, and likely the commercial site would be served by separate water meters. Water mains would connect to the nearest available points of connection as listed under *Existing Conditions - Utilities*. The future commercial area would be served by the existing 8-in. diameter City supply line.

All the non-residential buildings would include sprinkler systems, as required by the City municipal code, in case of fire. 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, portions of the adventure center, and selectively throughout the RV resort. The single- and multi-family residential areas could also be irrigated, depending on the landscaping selected.

Sewer

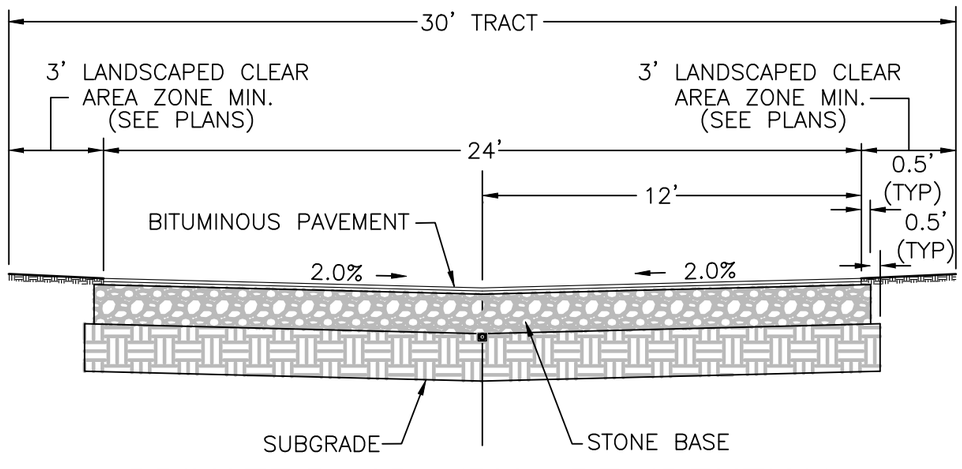
Sewer service for the project would be provided by the City of Cle Elum. Proposed single- and multi-family development, the associated amenity, and the adventure centers, would be served by private 8-in. diameter gravity sanitary sewer mains that would be owned, operated, and maintained by Sun Communities.



PUBLIC CONNECTOR ROAD
TYPICAL CROWN ROAD CROSS-SECTION

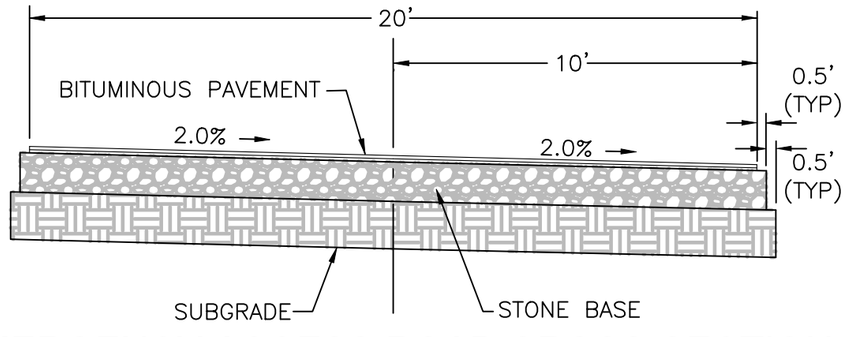
NOT TO SCALE

NOTES:
1. MAXIMUM ROADWAY SLOPE = 11%
2. EMERGENCY ACCESS ROADWAY CROSS-SLOPE TO BE ADJUSTED AS NEEDED, AT 2% MAXIMUM IN THE DIRECTION THAT BEST MATCHES EXISTING NATURAL TOPOGRAPHY



PRIVATE ROADS (RV & RESIDENTIAL)
TYPICAL INVERTED CROWN ROAD CROSS-SECTION

NOT TO SCALE



EMERGENCY ACCESS ROAD CROSS-SECTION

NOT TO SCALE

Source: ESM Consulting Engineers, 2020.

Figure 2-14

Road Cross Sections--SEIS Alternative 6

The proposed RV resort would be served by private 8-in. 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-in. diameter sewer main.

The off-site commercial area would be served by public 8-in. diameter gravity sewer mains that would be owned, operated, and maintained by the City of Cle Elum.

(See Section DSEIS 3.13, **Utilities**, for details.)

Stormwater Management

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 NPDES Permit (No. WA0052361). This permit may need to be amended to include a transfer of coverage to the Applicant.

During Operation

A permanent stormwater management system would be installed onsite, in accordance with the 2019 Department of Ecology (DOE) *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 (see **Figure 3.2-1** in DSEIS Section 3.2, **Water Quantity & Quality**, for a deptiction of the conceptual stormwater plan).

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Solid Waste

Solid waste collection for the proposed development would be provided by Waste Management of Ellensburg or its successors. The wastes would be hauled to the Cle Elum Transfer Station prior to transport to the Greater Wenatchee Land Fill in Douglas County for final disposal.

(See DSEIS Section 3.13, **Utilities**, for details.)

Energy

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

Landscaping

SEIS Alternative 6 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 single- and multi-family areas. The landscaping would generally consist of natural, local, and drought tolerant plants, including hydroseed mixes that could include wildflowers. Landscaping plans will be submitted with the formal application for the project.

The open space areas would generally remain in their natural form. A 100-foot natural buffer would be preserved adjacent to the RV resort along Bullfrog Road. In some cases, compatible species would be planted in open space areas to provide additional screening. A land stewardship plan (LSP) would be adopted and implemented, similar to that used by Suncadia, to ensure the long-term health of the designated open space areas. The LSP would include provisions for "firewising" (e.g., thinning small trees, cutting limbs, raking debris and other fuel-reduction techniques) and outline the different management zones with provisions for maintaining wildlife habitat, as generally described in the previous discussion under *Open Space*.

Lighting

Roads and structures within the developed areas are proposed to have minimal nighttime lighting. Use of natural construction materials, non-reflecting surfaces, and vegetative buffers would help reduce or control light/glare impacts further.

Residential lighting would be reduced or controlled through implementation of architectural design guidelines that would specify down-lighting and shaded fixtures for exterior lighting. In addition, a "dark sky" lighting plan would be adopted and implemented to reduce glare from common areas (i.e., streets and parking areas).

Street lighting design, including in the RV resort, would conform to the principles of preserving dark skies while providing lighting levels appropriate for roadway safety and security. Streetlights would be located at intersections, pedestrian trail crossings, and other locations where needed. Alternative luminary styles would be considered during project design. Lighting plans will be submitted with the formal application for the project, prior to issuance of the Final SEIS.

(See DSEIS Section 3.9, **Aesthetics/Light & Glare**, for details.)

Sustainability

The proposed project would include low-flow plumbing fixtures consistent with State building code requirements. Limitations on landscaping and other water-conservation measures would be established in coordination with City of Cle Elum to reduce the need for irrigation.

LED/CFL energy-efficient lighting is expected to be installed selectively throughout the project. The use of solar energy is being contemplated and will be analyzed further.

Low Impact Development (LID) measures, such as sheet flow dispersion, would be used in the permanent stormwater management system.

2.6.2.2 No Action Alternative

SEIS Alternative 5 *– Approved Bullfrog Flats Master Site Plan*

According to the SEPA Rules, "no action" does not necessarily mean that nothing (no development) would occur on the site. This alternative is typically defined as what would most likely happen if the proposal did not occur. Given that there is an approved Master Site Plan and Development Agreement for the Bullfrog Flats project, the No Action Alternative studied in this SEIS represents development of that approved project. This assumes that the Applicant could move forward to develop the site according to the approved plan and agreement without triggering a major amendment. However, the approved Master Site Plan has been updated for purposes of analysis in the SEIS to reflect current conditions and regulations. SEIS Alternative 5 includes development of a mix of residential and employment uses, open space/recreational facilities, and future development areas on an approximately 1,100-acre site, as described below (see **Figure 2-5** and **Table 2-1**).

Proposed Land Uses

Residential

SEIS Alternative 5 would provide 1,334 residential units, including 810 single family and 524 multi-family units. There would be no permanent RV resort; however, the commercial property could be used as a temporary RV site for construction workers. A 7.5-acre property located in the southeastern portion of the site would be reserved for future affordable housing and would ultimately be dedicated to the City of Cle Elum. It is assumed that 50 affordable housing units would be developed on this site.

The single family lots would range from 5,000 sq. ft. to over 8,400 sq. ft. At buildout, net density would be 5.1 du/acre.[14] Housing sizes could range from 1,500 to 3,500 sq. ft. (or larger).

The multi-family units would be apartments and condominiums. The buildings would typically be 2 to 3 stories high, with two to 24 units each. At buildout, net density would be 8.7 du/acre.[15]

[14] Ibid., 3.
[15] Ibid., 3.

Open Space, Parks, & Recreation Facilities

A total of 524 acres (48% of the site) is proposed as open space, including natural areas along the Cle Elum River.

Recreational facilities would include property set aside for a proposed Community Recreation Center,[16] a neighborhood clubhouse located on a lake, pocket parks, and a trail system. A number of lakes are proposed. The largest lake could be used for certain recreational activities.

Commercial Development

A total of 950,000 sq. ft. of commercial uses would be developed on a 75-acre property along the site's eastern boundary. Potential uses could include: light industrial, research and development, warehousing, offices, and retail.

Other Development Areas

Land would be set aside for the City of Cle Elum Water Treatment Plant (12 acres), expansion site for the School District (35 acres), expansion of the existing cemetery (10 acres), and a Reserve area (175 acres) on the lower bench of the property.[17]

Project Design & Construction

It is assumed that all the residential and recreational structures would be conventional stick-built.

Phasing Plan

The phasing plan for SEIS Alternative 5 is assumed to be similar to FEIS Alternative 5, as presented in **Table 2-9.** As shown, buildout is assumed to occur over 30 years. Approximately 59% of the residential units would be developed by year 5, 91% by year 20, and the remaining 9% by year 30. Demand for about 11% of the commercial acreage would be generated by year 5, 64% by year 20, and the remaining 36% by year 30.

[16] An agreement that has been reached between the City of Cle Elum and New Suncadia related to the municipal/community recreation center, which is now being implemented, provides for transfer of title to the recreation center site and payments to support construction of a facility.

[17] Land for the Water Treatment Plant, School District, and Washington State Horse Park has already been dedicated and developed, but is still included in SEIS Alternative 5 to be consistent with the Approved Master Site Plan.

Table 2-9
PHASING PLAN – FEIS ALTERNATIVE 5/SEIS ALTERNATIVE 5

Land Use	Year 5	Year 20	Year 30	Total
Residential				
Single Family	319 du/90 acre	366 du/92 acre	125 du/31 acre	810 du/213 acre
Multi-Family	489 du/72 acre	35 du/8 acre	--	524 du/80 acre
Total Residential	**788 du/161 acre**	**421du/101 acre**	**125 du/31 acre**	**1,334 du/293 acre**
Commercial				
Total Commercial [1]	**8.6 acres**	**42.8 acres**	**28.6 acres**	**80 acres[2]**

Source: UGA FEIS, 2002.

[1] Land use demand for the commercial development at project years 5, 20, and 30 assumes buildout in even increments over 27 years.

[2] The commercial property under SEIS Alternative 5 would be 75 acres.

Note that the current Bullfrog Flats Development Agreement will expire in 2027 unless it is extended by mutual agreement of the parties. If it were not extended to reflect the assumed 30-year phasing schedule, then less development would be likely to occur by 2027. The SEIS does not speculate on what potential changes to the Master Site Plan might occur under this scenario, and instead assumes, for purposes of analysis, that the currently approved plan would be developed according to the phasing schedule analyzed in the 2002 Cle Elum UGA EIS.

Clearing, Grading, & Impervious Areas

Proposed development under SEIS Alternative 5 would require clearing of about 403 acres. Approximately 644,000 cy of cut and 420,000 cy of fill is estimated for grading. Following development, about 247 acres would be covered in impervious surfaces.[18]

Residents/Employees

At buildout, there would be a total of approximately 2,809 residents.[19] It is estimated that the commercial development would create 2,025 local construction jobs over the life of the development and 1,900 permanent jobs. (See DSEIS Section 3.8, **Housing, Population, & Employment**, and Section 3.15, **Economic & Fiscal Conditions**, for details about population and employment assumptions.)

Site Access and Circulation

Five access points would be provided from the surrounding roadway system under SEIS Alternative 5.

[18] Note that the estimated clearing, grading, and impervious surface areas for certain components of the alternatives (e.g., public facilities, community recreation center, school expansion, and cemetery expansion) vary because different assumptions were made for FEIS Alternative 5 in the 2002 FEIS, SEIS Alternative 5 in the 2002 Development Agreement, and SEIS Alternative 6. See the Supplement to the Site Engineering Report in **Appendix B** for details.

[19] Similar to SEIS Alternative 6, an average occupancy of 90% and a household size of 2.34 persons is assumed based on the 2018 ACS 5-year Estimates.

Utilities

Utilities, including: water, sewer, stormwater management, electricity, natural gas, and solid waste management, would be provided for the project, similar to under SEIS Alternative 6.

Other Alternatives Considered but Eliminated from Detailed Study - Contination of Existing Conditions

Under this possible No Action Alternative scenario, it is assumed that the site would remain in its existing, largely vacant, naturally vegetated condition, and that no new physical development would occur in the forseeable future. Horseback riding, and unauthorized hiking and snowmobiling would continue to occur on roads and trails throughout the site. Firewising would also persist on portions of the site, in accordance with Suncadia's LSP.

The 2002 Development Agreement approved for the site includes a number of conditions, most of which apply to physical development of the site. However, several of the conditions would pertain with or without development, and could be considered "existing conditions", including the following (paraphrased):

(47) the City may enforce use and access restriction in designated areas, especially the Cle Elum River opens space, to minimize disturbance to fish and wildlife during mating and breeding seasons.

(77) the developer shall set aside approximately 10 acres for the City to acquire for cemetery expansion.

(94) the developer shall participate with the City and School District in petitioning WSDOT to reduce the speed limit on SR 903 adjacent to the school property. The developer will also work with the City to collect and present information on the I-90 Bullfrog Road westbound on-ramp regarding revisions to the weigh station exit/on ramp configuration.

Given that this No Action scenario parallels the existing conditions described under "Affected Environment" in **Chapter 3**, this scenario would be redundant and not informative and was eliminated from further study in the SEIS.

2.7 COMPARISON OF ALTERNATIVES

The following list compares key development features under FEIS and SEIS Alternative 5, and SEIS Alternative 6:

- **Site Area:** a smaller site area would be included with SEIS Alternative 6 than with FEIS and SEIS Alternative 5, mostly because properties that were dedicated for school expansion, the WWTP, and a reserve area (including the Horse Park that was subsequently constructed) are be part of FEIS and SEIS Alternative 5, and not SEIS Alternative 6.
- **Residential Units:** there would be fewer permanent residential units provided under SEIS Alternative 6 than under FEIS and SEIS Alternative 5. However, an RV resort would be included in SEIS Alternative 6 (FEIS and SEIS Alternative 5 could temporarily provide RV sites on the commercial development property for

construction workers). All residential units are considered primary residencers. For purposes of analysis in this FSEIS, however, it is theorized that approximately 35% of the single family residential units under SEIS Alternative 6 could be second/vacation homes.

- **Open Space:** less open space area would be provided under SEIS Alternative 6 than under FEIS and SEIS Alternative 5. However, a larger percentage of the overall site area would remain undeveloped and in open space under SEIS Alternative 6.
- **Recreational Amenities:** All the alternatives would include recreational amenities, including private clubhouse(s)/amenity centers. SEIS Alternative 6 would provide a public adventure center and private recreational facilities that are not included in FEIS and SEIS Alternative 5. FEIS and SEIS Alternative 5 would include lakes, one of which could be used for recreational purposes that are not included in SEIS Alternative 6. All three alternatives would feature a system of trails.
- **Commercial Development:** the commercial development would be in the same general location under the alternatives, but there would be a smaller property and significantly less possible commercial development with SEIS Alternative 6 (a 25-acre property with 150,000 sq. ft. of potential retail and professional office) than with FEIS and SEIS Alternative 5 (a 75 to 80-acre property with 950,000 sq. ft. of business park/light industrial).
- **Affordable Housing Site:** SEIS Alternative 6 would include a slightly smaller affordable housing site than SEIS Alternative 5; no affordable housing site was included in FEIS Alternative 5.
- **Cemetery Expansion Site:** The cemetery site would be the same site size/location under FEIS and SEIS Alternative 5. The cemetery expansion site would be larger under SEIS Alternative 6.
- **Access Points:** fewer access point would would be provided to the surrounding roadway system under SEIS Alternative 6 (four access point); five access points would be provided from the surrounding roadway system under FEIS and SEIS Alternative 5 (including primary and access points, and the access point to the future affordable housing).

Further comparisons of the Alternatives are provided in **Chapter 1** and **Chapter 3**.

2.8 BENEFITS AND DISADVANTAGES OF DEFERRING PROJECT IMPLEMENTATION

The benefits of deferring all actions on the 47° North Project (e.g., not approving the proposed revisions to the approved Master Site Plan in the foreseeable future) are:

- The undeveloped site would not be converted to the proposed intensive residential and recreational use at this time; this could be perceived as either a benefit or disadvantage, depending on one's perspective. However, the site could be developed pursuant to the approved Master Site Plan and Development Agreement and, in that case, would not remain in its current undeveloped condition. As noted

previously, the amount and timing of development would depend upon an extension of the Development Agreement by the parties.

- The environmental impacts typical of large-scale urban-type mixed-use development, including increased traffic, stormwater runoff, light and glare, noise, and demand for public facilities and services, would be deferred at this time. However, these impacts could occur in the future with development of the approved Master Site Plan.

The disadvantages of deferring all actions on the 47° North Project are:

- The opportunity to provide a range of relatively affordable housing choices would be deferred.
- The opportunity to provide public parks/recreational facilities and permanent open space would be deferred.
- The increased tax base and positive net revenues that would accrue to City of Cle Elum and service providers from construction and occupancy of the proposed development would be deferred (but costs would be deferred as well).
- Some of the population and housing growth that would otherwise be accommodated by the project could locate elsewhere, including in unincorporated rural areas.

Chapter 3

TOPIC AREA RESPONSES / UPDATED INFORMATION & ANALYSIS

CHAPTER 3
TOPIC AREA RESPONSES / UPDATED INFORMATION & ANALYSIS

The City provided a 45-day extended public comment period for the *47° North Proposed Master Site Plan Amendment Draft Supplemental Environmental Impact Statement* (Draft SEIS or DSEIS). All the comments that were received from agencies, tribes, organizations, and individuals during the comment period, as well as comments from one agency and one individual that were received after the comment period, are contained in **Chapter 4** of this Final SEIS (or FSEIS). A total of 110 written comment letters/emails were received,[1] eight phone messages were left on the dedicated phone line, and one spoken comment was made by an individual at the virtual public meeting. Most of the comment letters that were received (approximately 76% of all the letters) contained comments that related to the municipal/community recreation center site in 47° North.

Many comments that were received on the DSEIS identified common topics, and these are referred to as "topic areas" in this FSEIS. This approach is intended to reduce repetition and to provide a single comprehensive response to identical or similar comments that share a common theme. **Chapter 3** of the FSEIS lists the topic areas and provides collective responses to the substantive comments. Additional information and analyses were prepared to address some of the comments and are also summarized in this chapter under the applicable responses. Technical memos/reports on which the responses are based are contained in FSEIS appendices: **Appendix A** (Transportation Analysis Addendum Memo), **Appendix B** (Updated Cultural Resources Report), **Appendix C** (Updated Supplement to the Site Engineering Technical Report), **Appendix D** (Updated Plants, Animals, & Wetlands Memo), and **Appendix E** (Updated Fiscal Conditions Memo).

Below are the topic and sub-topic areas discussed in **Chapter 3** of the FSEIS and their location in the chapter. The topic areas are organized based on the number of comments received on the topic, arranged from most comments to least comments received.

3-1 Parks & Recreation

3-1.1 2020 DSEIS 3-4

3-1.2 2021 FSEIS 3-4

3-1.2.1 Municipal/Community Recreation Center 3-4

3-1.2.2 Relationship to Washington State Horse Park 3-5

3-1.2.3 Impacts of RV Resort Visitors 3-6

[1] Note that a couple of commenters submitted more than one letter, and several letters were signed by more than one individual.

3-2 Transportation
3-2.1 2020 DSEIS....3-8
3-2.2 2021 FSEIS....3-8
3-2.2.1 General Traffic/Congestion & Access Considerations....3-8
3-2.2.2 Existing Traffic Volumes....3-10
3-2.2.3 Level of Service Standards....3-10
3-2.2.4 Collision History....3-12
3-2.2.5 RV Resort Trip Generation....3-13
3-2.2.6 Other Project Trip Generation....3-14
3-2.2.7 Traffic Model Forecasting & 47º North Project Trip Distribution....3-15
3-2.2.8 47º North Access to Douglas Munro Boulevard....3-16
3-2.2.9 SR 903/47º North Connector Road Access....3-17
3-2.2.10 Connector Road Through the Site....3-18
3-2.2.11 Mitigation and Pro-Rata Share....3-19
3-3 Historic & Cultural Resources
3-3.1 2020 DSEIS....3-23
3-3.2 2021 FSEIS....3-23
3-3.2.1 Cultural Resources Analysis Methods & Assumptions....3-23
3-3.2.2 Cultural Resources Information & Mitigation....3-25
3-3.2.3 Protocols for Communication/Documentation....3-26
3-4 Utilities
3-4.1 2020 DSEIS....3-27
3-4.2 2021 FSEIS....3-27
3-4.2.1 Water & Sewer Demand....3-27
3-4.2.2 City Utility System Capacity....3-29
3-4.2.3 Solid Waste Facility Capacity....3-31
3-5 Public Services
3-5.1 2020 DSEIS....3-33
3-5.2 2021 FSEIS....3-33
3-5.2.1 Emergency Access....3-33
3-5.2.2 General Demand for Public Services....3-34
3-5.2.3 Impacts to Police Services....3-37
3-5.2.4 Fire Prevention....3-39
3-6 Plants, Animal, & Wetlands
3-6.1 2020 DSEIS....3-41
3-6.2 2021 FSEIS....3-41
3-6.2.1 Comprehensive Wildlife Survey....3-41
3-6.2.2 Regulated Species & Species/Habitats of Greatest Conservation Need....3-43
3-6.2.3 Wildlife Movement....3-46
3-6.2.4 Loss of Habitat & Wildlife/Human Interactions....3-47
3-6.2.5 Land Stewardship Plan....3-48

3-7 Fiscal & Economic Conditions
3-7.1 2020 DSEIS....3-50
3-7.2 2021 FSEIS....3-50
3-7.2.1 City of Cle Elum Police Department Costs....3-50
3-7.2.2 Costs/Revenues to the City of Cle Elum & Other Service Providers....3-52
3-7.2.3 Services & Infrastructure Funding....3-55
3-8 Aesthetics/Light & Glare
3-8.1 2020 DSEIS....3-58
3-8.2 2021 FSEIS....3-58
3.8.2.1 Views....3-58
3-9 Housing, Population, & Employment
3-9.1 2020 DSEIS....3-66
3-9.2 2021 FSEIS....3-66
3-9.2.1 Affordable Housing....3-66
3-10 Air Quality/Greenhouse Gas Emissions
3-10.1 2020 DSEIS....3-69
3-10.2 2021 FSEIS....3-69
3-10.2.1 CO_2 Emissions & Climate Change....3-69
3-11 Other Topics
3-11.1 Opinions About the Project....3-71
3-11.2 Coordination with the City of Roslyn....3-73
3-11.3 Ridge Settlement Agreement....3-73
3-11.4 Suncadia Resort Construction Rate....3-74
3-11.5 Impact Fees....3-74
3-11.6 Concurrency....3-75
3-11.7 General Adequacy of SEIS....3-76
3-11.8 Primary vs. Second/Vacation Homes....3-77

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

3-1. PARKS & RECREATION

3-1.1 2020 DSEIS

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

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

3-1.2 2021 FSEIS

3-1.2.1 Municipal/Community Recreation Center

Comments Received

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

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

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

Response to Comments/Updated Information & Analysis

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

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

3-1.2.2 Relationship to Washington State Horse Park

Comments Received

L-5 (1-6)

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

Response to Comments/Updated Information & Analysis

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

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

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

3-1.2.3 Impacts of RV Resort Visitors

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

3-2. TRANSPORTATION

3-2.1 2020 DSEIS

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

The DSEIS concluded that the SEIS Alternatives would generate temporary construction-related traffic impacts over buildout of the project. Construction traffic impacts would be shorter and more condensed under SEIS Alternative 6. Proposed development under the SEIS Alternatives would increase traffic volumes and congestion on area roadways during operation of the project (e.g., in the City, County, and on state facilities such as SR 903, SR 907, and I-90); this is an unavoidable effect of urban development. The LOS analysis indicated that several of the studied intersections would exceed LOS standards during the summer PM peak hours in the future analysis years (2025, 2031, and 2037) with the additional traffic generated by the SEIS Alternatives; some of these intersections would also exceed the LOS standards without the projects (Baseline scenario) due to continued growth in background traffic. Measures were identified to mitigate intersections anticipated to operate at non-compliant LOS in the future analysis years under 'Baseline' conditions and conditions with the SEIS Alternatives.

3-2.2 2021 FSEIS

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

3-2.2.1 General Traffic/Congestion & Access Considerations

Comments Received

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

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

Response to Comments/Updated Information & Analysis

General Traffic/Access

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

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

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

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

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

Emergency Access

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

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

3-2.2.2 Existing Traffic Volumes

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

3-2.2.3 Level of Service (LOS) Standards

Comments Received

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

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

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

Response to Comments/Updated Information & Analysis

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

Weekday Summer PM Peak Hour Future Year LOS

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

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

- #8 - Ranger Station Road / Miller Avenue / W 2nd Street (SR 903) – LOS D by 2025 *(identified as non-compliant in 2025 with Alternative 5 or Alternative 6 in DSEIS)*
- #11 - Douglas Munro Boulevard / W 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

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

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

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

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

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

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

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

SR 903/Pennsylvania Avenue Intersection

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

Site Access LOS

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

3-2.2.4 Collision History

Comments Received

L-3 (1, 3)

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

Response to Comments/Updated Information & Analysis

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

3-2.2.5 RV Resort Trip Generation

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

3-2.2.6 Other Project Trip Generation

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

3-2.2.7 Traffic Model Forecasting & 47º North Project Trip Distribution

Comments Received

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

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

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

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

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

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

3-2.2.8 47º North Access to Douglas Munro Boulevard

Comments Received

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

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

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

Response to Comments/Updated Information & Analysis

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

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

3-2.2.9 SR 903/47º North Connector Road Access

Comments Received

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

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

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

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

Response to Comments/Updated Information & Analysis

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

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

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

3-2.2.10 Connector Road through the Site

Comments Received

L-15 (2)

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

Response to Comments/Updated Information & Analysis

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

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

[2] WSDOT Design Manual 540.03(4)(b)

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

3-2.2.11 Mitigation & Pro-Rata Share

Comments Received

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

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

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

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

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

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

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

Another comment suggested that Bullfrog Road should be widened to accommodate the increase in traffic with 47º North.

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

Response to Comments/Updated Information & Analysis

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

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

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

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

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

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

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

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

The transportation Mitigation Measures section in the FSEIS also identifies a Monitoring Program that has the following objectives:

A. Document traffic volumes at key locations (roadways and/or intersections) in the local transportation network that would be impacted by traffic generated by the 47° North development;

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

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

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

3-3. HISTORIC & CULTURAL RESOURCES

3-3.1 2020 DSEIS

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

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

3-3.2 2021 FSEIS

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

3-3.2.1 Cultural Resources Analysis Methods & Assumptions

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

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

3-3.2.2 Cultural Resources Information & Mitigation

Comments Received

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

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

Response to Comments/Updated Information & Analysis

Information from Yakama Nation

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

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

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

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

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

Mitigation Measures

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

3-3.2.3 Protocols for Communication/Documentation

Comments Received

L-1 (5, 6)

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

Responses to Comments/Updated Information & Analysis

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

3-4. UTILITIES

3-4.1 2020 DSEIS

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

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

3-4.2 2021 FSEIS

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

3-4.2.1 Water & Sewer Demand

Updated Information

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

Response to Comments/Updated Information & Analysis

Water

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

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

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

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

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

Source: HLA Engineering, 2020.
[1] ADD = Average Daily Demand.
[2] MDD = Maximum Daily Demand.

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

Sewer

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

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

3-4.2.2 City Utility System Capacity

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

Water

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

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

Projected water demand would be translated into actual consumption as the development phases are constructed. The 2001 Water Supply System Project Development Agreement between the City of Cle Elum and Trendwest (now New Suncadia) established "trigger" points when improvements would become necessary, including production thresholds for specified duration, or when a specified number of new connections are reached. Similar "trigger" points should be established for the three system components identified for 47° North and City Heights.

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

Sewer

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

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

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

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

Table 3-2
WASTEWATER TREATMENT FACILITY CAPACITY ALLOCATION

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

Source: HLA Engineers, 2021.

[1] The ERU allocation is based on 2008 amendment to the allocation agreement.
[2] The 47° North ERUs are based on December 2020 Water System Analysis Memo prepared by HLA (see FSEIS **Appendix C**).
[3] The City Heights ERUs are subject to the terms of Development Agreement for the project.
[4] The Cle Elum Pines remaining ERUs are based on calculations by the City Engineer.

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

The City of Cle Elum Regional WWTP NPDES Permit can be found at: https://apps.ecology.wa.gov/paris/FacilitySummary.aspx?FacilityId=8169652

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

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

3-4.2.3 Solid Waste Facility Capacity

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

3-5. PUBLIC SERVICES

3-5.1 2020 DSEIS

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

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

3-5.2 2021 FSEIS Updated Information & Analysis

3-5.2.1 Emergency Access

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

3-5.2.2 General Demand for Public Services

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

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

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

Estimated Costs of Facilities

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

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

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

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

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

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

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

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

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

3-5.2.3 Impacts to Police Service

Comments Received

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

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

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

Response to Comments/Updated Information & Analysis

Methodology Used for Police Services Analysis

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

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

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

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

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

RV Resort Impacts on Police Service

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

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

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

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

Source: Sun Communities, 2021, City of Paso Robles Police Dept., 2021, Amador Co. Police Dept., 2021, City of Granby Police Dept., 2021, City of Bend Police Dept. 2021.
RV = Recreational Vehicle
MH = Manufactured Housing
NR = Not Reported

3-5.2.4 Fire Prevention

Comments Received

L-94 (4)

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

Response to Comments/Updated Information & Analysis

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

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

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

3-6. Plants, Animals, & Wetlands

3-6.1 2020 DSEIS

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

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

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

3-6.2 2021 FSEIS

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

3-6.2.1 Comprehensive Wildlife Survey

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

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

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

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

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

Washington State Wildlife Action Plan (SWAP)

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

Species/Habitats of Greatest Conservation Need

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

Table 3-4
SPECIES OF GREATEST CONSERVATION NEED

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

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

Source: Raedeke Associates, 2021.

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

Elk

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

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

Spotted Owl

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

3-6.2.3 Wildlife Movement

Comments Received

L-2 (3, 6)

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

Response to Comments/Updated Information & Analysis

Habitat Concentration & Connectivity Areas

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

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

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

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

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

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

3-6.2.4 Loss of Habitat & Wildlife / Human Interactions

Comments Received

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

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

Response to Comments/Updated Information & Analysis

Habitat Removal & Fragmentation

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

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

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

Wildlife/Human Interactions

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

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

New possible mitigation measures are identified in this FSEIS to help minimize human/wildlife conflicts. These measures include provisions such as the use of bear-proof garbage receptacles, well-signed natural areas, informational signage about the risks associated with living near natural areas, well-marked common road crossings, well-marked speed limits, and environmental education and outreach. In addition, a potential measure could be included in the Land Stewardship Plan or in another agreement to develop a plan to manage retained open space areas to better facilitate elk, which could help reduce their impacts elsewhere. These measures have been added as “Other Possible Mitigation Measures” in this FSEIS (see **Chapter 1**).

3-6.2.5 Land Stewardship Plan

Comments Received

L-2 (5, 6)

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

Response to Comments/Updated Information & Analysis

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

3-7. FISCAL & ECONOMIC CONDITIONS

3-7.1 2020 DSEIS

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

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

3-7.2 2021 FSEIS

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

3-7.2.1 City of Cle Elum Police Department Costs

Comments Received

L-4 (1-8)

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

Response to Comments/Updated Information & Analysis

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

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

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

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

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

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

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

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

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

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

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

[6] Buildout is assumed to be 2051 for SEIS Alternative 5 and 2037 for SEIS Alternative 6. Buildout is assumed to be 2028 for SEIS Alternative 6 residential and recreational development and 2037 for the SEIS Alternative possible commercial development.

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

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

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

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

Source: ECONW, 2021.

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

3-7.2.3 Services & Infrastructure Funding

Comments Received

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

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

Response to Comments/Updated Information & Analysis

General Services & Infrastructure Funding

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

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

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

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

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

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

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

School Capacity, Costs, & Funding

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

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

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

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

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

3-8. AESTHETICS / LIGHT & GLARE

3-8.1 2020 DSEIS

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

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

3-8.2 2021 FSEIS

3-8.2.1 Views

Comments Received

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

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

Response to Comments/Updated Information & Analysis

View Photosimulations/Cross-Sections

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

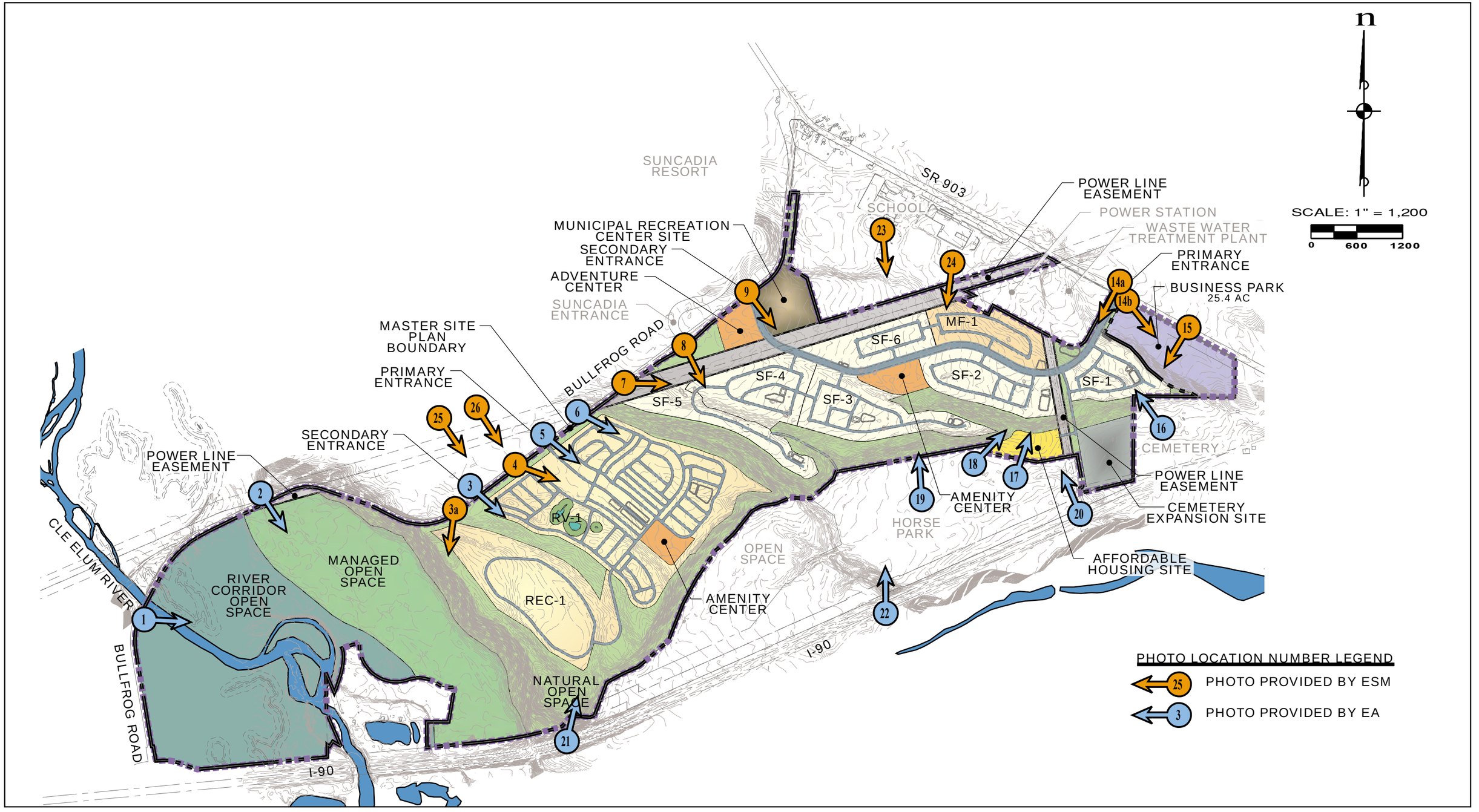
by forested open space/buffers that would be retained onsite (including the 100-foot minimum buffer along the road), existing landforms on and offsite, and the distance to development. The greatest potential for views towards development from Bullfrog Road would be adjacent to the proposed RV resort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

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

- **Viewpoint 6 (Cross Section) – View of RV-1 from Bullfrog Road, Looking West (Figure 3-2) –** Coniferous trees on the site are visible in the foreground, mid-ground, and background from this viewpoint. A powerline easement is also visible in the mid-ground and a ridgeline in the background. As shown by the cross-section of this viewpoint, views of the proposed RV resort would likely be blocked from Viewpoint 6 by the density of existing trees associated with the 100-foot minimum buffer retained along the perimeter of the site, and the distance to the nearest RV unit (approximately 106 feet). Any possible views of RV units would be partially screened by the retained vegetation.

- **Viewpoint 8 (Cross Section) – View of SF-4 from Bullfrog Road, Looking South (Figure 3-3) –** Bullfrog Road and coniferous trees are visible in the foreground. Coniferous trees can be seen in the mid-ground and background. A ridgeline is also evident in the background. As shown by the cross-section of this viewpoint, views of single family residential development in SF-4 would be blocked from Viewpoint 8 by the density of the existing trees associated with the 100-foot minimum buffer retained along the perimeter of the site, and the distance to the nearest residential unit (approximately 464 feet).

- **Viewpoint 9 (Cross Section) – Views of SF-4 from Bullfrog Road, Looking Southwest (Figure 3-4) –** Bullfrog Road and coniferous trees are visible in the foreground, mid-ground, and background. As shown by the cross-section of this viewpoint, views of single family residential development in SF-4 would be blocked from Viewpoint 9 by the density of the existing trees associated with the 100-foot minimum buffer retained along perimeter of the site, and the distance to the nearest single family unit (approximately 1,184 feet). Note that the municipal/community recreation center site is adjacent to Bullfrog Road in the foreground of this viewpoint. Site plans and designs for the recreation center have not been developed at this point; therefore, the potential visibility of the center cannot be described at this time. However, the 100-foot minimum buffer retained adjacent to Bullfrog Road would provide at least partial screening of the center.



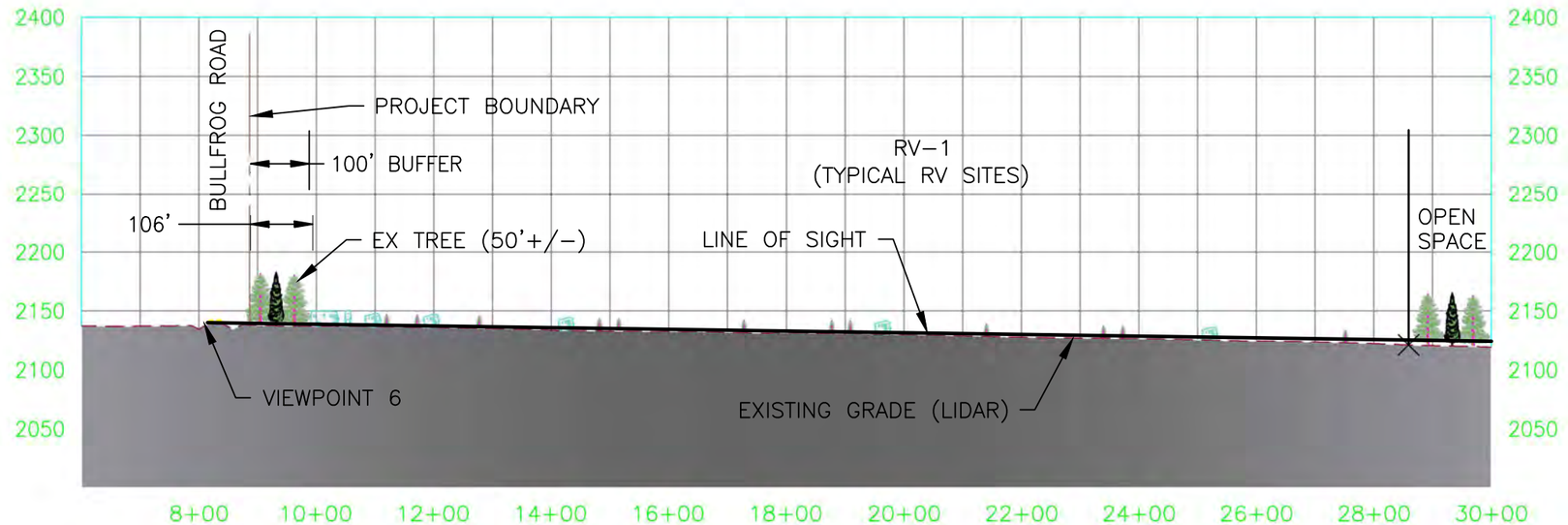
Source: ESM Consulting Engineers, 2020.

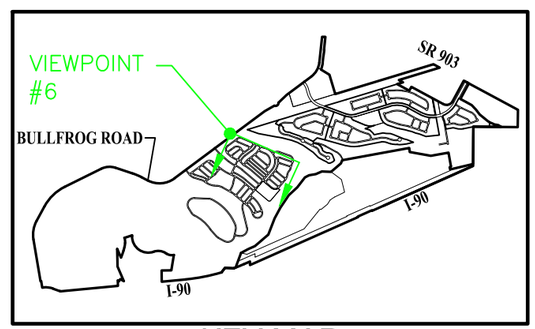
EA Engineering, Science, and Technology, Inc., PBC

Figure 3-1 - Viewshed Photo Locations



VIEWPOINT 6





KEY MAP

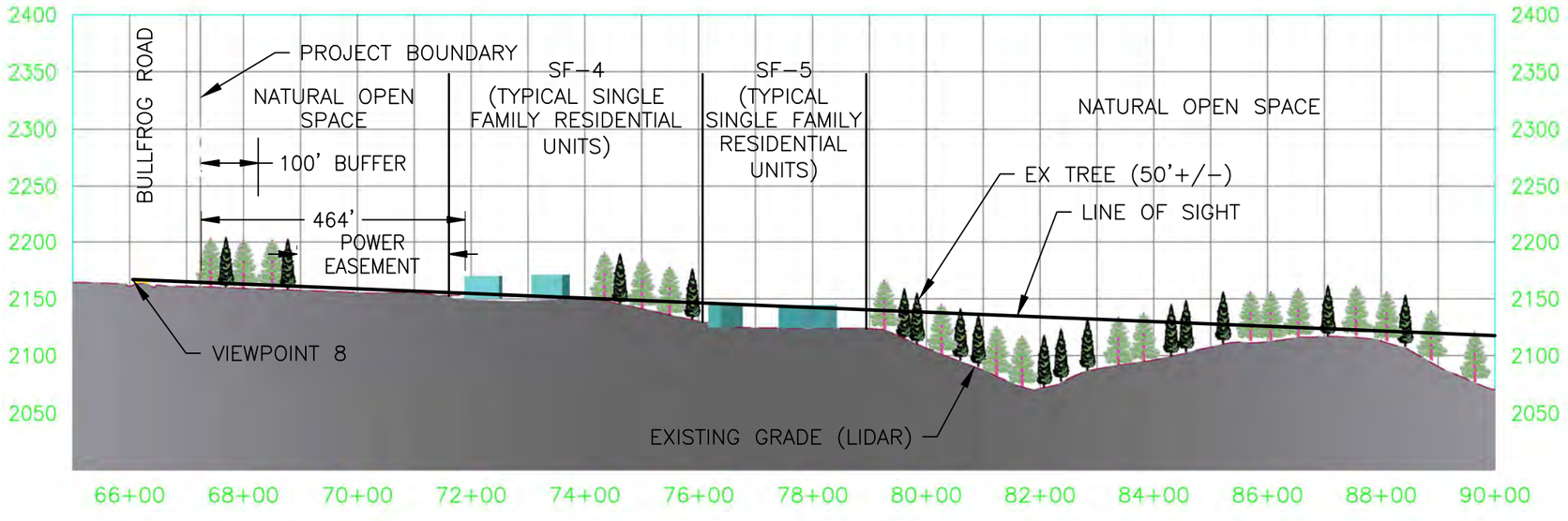
Source: ESM Consulting Engineers, 2020.
Photo Source: EA

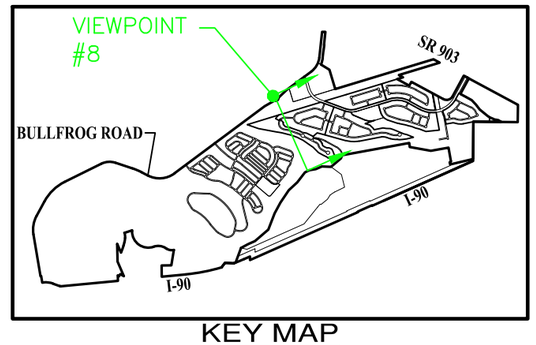
Figure 3-2
Post Development Cross-Section View 6

EA Engineering, Science, and Technology, Inc., PBC



VIEWPOINT 8





KEY MAP

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

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

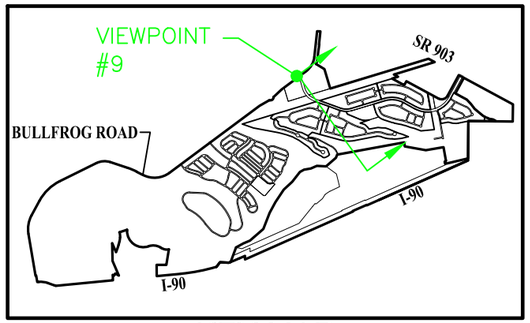
Figure 3-3

Post Development Cross-Section View 8

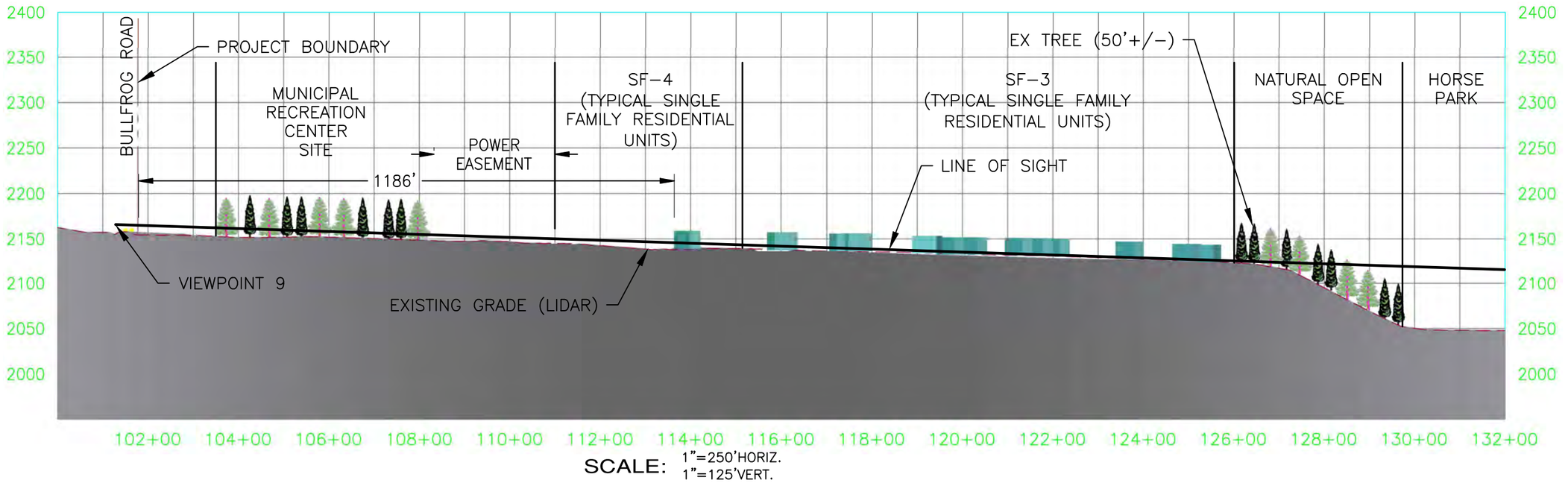
EA Engineering, Science, and Technology, Inc., PBC



VIEWPOINT 9



KEY MAP



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

Figure 3-4

Post Development Cross-Section View 9

EA Engineering, Science, and Technology, Inc., PBC

Extent of Potential View Impacts from Bullfrog Road

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

2002 Development Agreement

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

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

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

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

Dark Sky

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

3-9. HOUSING, POPULATION, & EMPLOYMENT

3-9.1 2020 DSEIS

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

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

3-9.2 2021 FSEIS

3-9.2.1 Affordable Housing

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

Table 3-6
AFFORDABLE HOUSING – SEIS ALTERNATIVE 6

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

Source: Sun Communities 2020.

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

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

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

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

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

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

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

3-10.1 2020 DSEIS

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

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

3-10.2 2021 FSEIS

3-10.2.1 CO_2 Emissions & Climate Change

Comments Received

L-82 (7, 21, 31)

One commenter stated that the DSEIS did not provide a realistic discussion of the climate effect of removing the forest and adding CO_2 with the proposed project. The transportation-related impacts of CO_2 emissions, particularly from the RVs, were also mentioned.

Response to Comments/Updated Information & Analysis

The DSEIS described how the decay of biomass releases CO_2 to the atmosphere and vegetation that has been permanently removed no longer removes CO_2 during natural photosynthesis. DSEIS Appendix F also discussed how all future development, including the proposed 47° North project, contributes to worldwide emissions of GHGs, which in turn contributes to potential future effects of global climate change (e.g., changes in seasonal temperature, seasonal precipitation, and local sea level rise) (see DSEIS Appendix F for details).

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

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

Transportation-related GHG (including CO_2) emissions were estimated on an annual basis using the methods described in DSEIS Appendix F. Transportation-related GHG emission estimates under SEIS Alternative 6 (which incorporated RV traffic) were summarized in DSEIS Section 3.4, Air Quality/Greenhouse Gas Emissions, Table 3.4-2. As shown, SEIS Alternative 6 would emit less transportation-related GHG emissions than SEIS Alternative 5 (23,972 vs. 56,030 metric tons CO_2e per year).

3-11. OTHER TOPICS

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

3-11.1 Opinions About the Project

Comments Received

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

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

Response to Comments/Updated Information & Analysis

For/Against the Project

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

Quality & Maintenance

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

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

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

Different Uses

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

Impacts of Other Sun Communities

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

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

3-11.2 Coordination with City of Roslyn

Comments Received

L-5 (1-3)

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

Response to Comments/Updated Information & Analysis

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

3-11.3 Ridge Settlement Agreement

Comments Received

L-63 (1-10)

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

Response to Comments/Updated Information & Analysis

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

3-11.4 Suncadia Resort Construction Rate

Comments Received

L-63 (7)

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

Response to Comments/Updated Information & Analysis

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

3-11.5 Impact Fees

Comments Received

L-82 (17)

One comment asked whether impact fees would be implemented.

Response to Comments/Updated Information & Analysis

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

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

3-11.6 Concurrency

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

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

3-11.7 General Adequacy of SEIS

Comments Received

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

A few commenters requested that the City prepare a complete, "high-quality" SEIS for 47° North. One comment indicated that a second DSEIS should be prepared to adequately address the impacts of the SEIS Alternatives and required mitigation measures.
A couple of comments requested that the impacts of the RV resort be analyzed separately, or in a separate SEIS.

Response to Comments/Updated Information & Analysis

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

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

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

3-11.8 Primary vs. Second/Vacation Homes

Comments Received

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

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

Response to Comments/Updated Information & Analysis

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

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

Population Assumptions

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

Environmental Impacts

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

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

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

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

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

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

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

Chapter 4
COMMENT LETTERS

CHAPTER 4
COMMENT LETTERS

This chapter of the *47º North Proposed Master Site Plan Amendment Final SEIS* contains all the comments received on the Draft SEIS. During the 45-day extended public comment period, as well as two comment letters received after the comment period ended. A total of 110 written comment letters/emails were received,[1] eight phone messages were left on the dedicated phone line, and one spoken comment was made by an individual at the virtual public meeting. Comment letters/numbers appear in the margins of the letters/transcriptions and are cross-referenced to the corresponding responses. Comments and responses are grouped in the following categories: Comment Letters (Agencies/Tribes/Organization and Individuals), Dedicated Phone Line Comments, and Public Meeting Comments.

Responses to all substantive comments are provided in **Chapter 3**.

Comment Letters

Agencies, Tribes, and Organizations

L-1 Washington State Department of Archaeology and Historic Preservation
L-2 Washington State Department of Fish and Wildlife
L-3 Washington State Department of Transportation
L-4 City of Cle Elum Police Department
L-5 City of Roslyn
L-6 Yakama Nation
L-7 Cle Elum Downtown Association
L-8 Cle Elum – Roslyn School District
L-9 Walter Strom Middle School
L-10 Walter Strom Middle School
L-11 City Heights
L-12 Suncadia
L-13 Sun Communities/Atwell
L-14 Washington Horse Park
L-15 Kittitas County Public Works (late but included as a courtesy)

[1] Note that a couple of commenters submitted more than one letter, and several letters were signed by more than one individual.

Individuals

L-16 J. & N Ahola
L-17 C. Anderson
L-22 M. Berry
L-23 B. Bogart
L-24 C. Bolender
L-25 L. Bronkema
L-26 K. Butorac
L-27 M. Butorac
L-28 A. Casto
L-29 C. Cook
L-30 A. Crawford
L-31 M. Day
L-32 M. DeKinkker
L-33 E. Doern
L-34 L. Donovan
L-35 C. Dunham
L-36 A. Dunn
L-37 F. Ellison
L-38 T. Ellison
L-39 J. Elward
L-40 A. Fuller
L-41 G. Green
L-42 S. Grindle
L-43 P. Griswold
L-44 M. Gruber
L-45 J. Hallisey
L-46 L. Halte
L-47 L. & T. Hegg
L-48 J. Hein (1)
L-49 J. Hein (2)
L-50 A. Hernandez
L-51 A. Hill
L-52 M. Hoban
L-18 D. & G. Bass
L-19 M. Bates
L-53 N. Holmes
L-54 D. Hutchinson
L-55 V. Jarvis
L-56 R. & B. Jayne
L-57 T. Jerke & P. Miller-Jerke
L-58 D. Johnson
L-59 S. Johnson (1)
L-60 S. Johnson (2)
L-61 C. Keller
L-62 C. Keller
L-63 D. Kilgore
L-64 M. Kirkpatrick
L-65 R. Kurz
L-66 R. Lovejoy
L-67 K. and C. Lucke
L-68 S. and D. Malcom
L-69 C. Martin
L-70 A. McCaffery
L-71 S. Melbardis
L-72 S. Miller
L-73 R. Moe
L-74 C. Montgomery
L-75 R. Najar
L-76 B. & S. Nelson
L-77 P. Nelson
L-78 B. Nicholls
L-79 C. Nicholls
L-80 A. Nicholson
L-81 T. O'Cain
L-82 J. Peck
L-20 M. Becker
L-21 F. & L. Benson
L-83 K. Rainwater
L-84 J. Reed
L-85 M. Reimer
L-86 A. Risvold
L-87 G. Rudolph
L-88 M. Santa
L-89 T. Santa
L-90 P. Schmidtt
L-91 L. Segarra
L-92 L. Shovlain
L-93 L. Shuck
L-94 M., V. & K. Soderstrom
L-95 D. St. Yves
L-96 S. Stern-Smith
L-97 E. Stevenson
L-98 M. Thompson
L-99 T. Uren
L-100 N. Van West
L-101 J. Waldenmaier
L-102 J. & L. Wallick
L-103 C. Wersland
L-104 E. Wise
L-105 K. Wyborski
L-106 J. Young
L-107 J. Young
L-108 L. Zepp
L-109 B. Zierke
L-110 M. Randleman (late but included as a courtesy)

Dedicated Phone Line Comments (in order spoken)

VM-1 T. Grishwold
VM-2 J. Young
VM-3 D. Chepoda
VM-4 C. Jones
VM-5 S. Watson
VM-6 J. Hine
VM-7 C. Hayes

VM-8 C. Scoon

Public Meeting Comments

PM-1 New Suncadia (R. Beck)

Agency, Tribes, & Organization Letters

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

October 2, 2020

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

In future correspondence please refer to:
Project Tracking Code: 2019-12-09417
Property: Proposed 47 Degrees North project by Sun Communities Inc.
Re: More Information Needed

Dear Lucy Temple:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) regarding the above referenced proposal. In response, we have reviewed the materials you provided for this project. Please review our comments below:

- We concur with several of the concerns presented by the Yakama Nation Cultural Resources Program (see attached email from Noah Oliver, dated 10/2/2020):
  - The report should be updated to include a map of the previously recorded sites within the project area in relation to the geotechnical trenches. It is unclear to DAHP whether geotechnical trenching activities occurred within the boundaries of previously recorded sites or not. 1
  - DAHP agrees that the "order of operations" for this project is problematic. It may be beneficial for the City of Cle Elum, DAHP, the Yakama Nation, and any other interested Tribes or parties to meet to discuss future projects. Ideally, cultural resources surveys should be conducted prior to any ground disturbance within proposed project areas. Please contact DAHP to arrange this meeting. 2

- On page 21 of the report, it is stated that "The area designated as potential future commercial space was not investigated during this field investigation." Will this area be investigated in the future? 3

- On page 31 of the report, the consultant states that 23 shovel tests were excavated to "supplement" the geotechnical trenches. Geotechnical trenching with a backhoe is not comparable to hand excavation using shovels and screens. Furthermore, the number of shovel tests does not appear to be adequate for the size of the project area, particularly when the majority of it has not been previously surveyed. We ask that the consultant either provides additional information describing why this number of shovel tests was adequate, or returns to the project area to systematically excavate additional shovel tests. 4

We appreciate receiving copies of any correspondence or comments from concerned tribes and other parties that you receive as you consult for this project. These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance with Washington State law. 5

Thank you for the opportunity to review and comment. Please ensure that the DAHP Project Number (a.k.a. Project Tracking Code) is shared with any hired cultural resource consultants and is attached to any communications or submitted reports. If you have any questions, please feel free to contact me. 6

Sincerely,



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

Letter L-2

RECEIVED
NOV - 2 2020

SEPARes onsibleOfficial

From: Nelson, Jennifer L (DFW) <Jennifer.Nelson@dfw.wa.gov>
Sent: Monday, November 02, 2020 2:36 PM
To: SEPAResponsibleOfficial
Cc: Lucy Temple; Torrey, Elizabeth M (DFW); Downes, Scott G (DFW)
Subject: WDFW comments on 47 North Draft SEIS
Attachments: WDFW comments 47 North SEIS Nov2020.pdf

Please find WDFW's comments on the Draft SEIS attached to this email.

Jennifer Nelson
Washington Department of Fish and Wildlife
Habitat Program
Ellensburg, WA 98926
(509) 961-6639 Mobile

State of Washington
DEPARTMENT OF FISH AND WILDLIFE
South Central Region • Region 3 • 1701 South 24th Avenue, Yakima, WA 98902-5720
Telephone: (509) 575-2740 • Fax: (509) 575-2474

November 2, 2020

SEPA Responsible Official
City of Cle Elum
119 West First Street
Cle Elum, WA 98922

SUBJECT: WDFW COMMENTS ON 47° NORTH DRAFT SEIS

Dear SEPA Responsible Official,

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Statement (SEIS) for the *47° North Master Site Plan* (project). The Washington Department of Fish and Wildlife (WDFW) has specialized knowledge of the wildlife and critical areas which intersect the project area. As the agency of expertise, these recommendations should be considered as part of the review and determination process.

We offer the following information and recommendations for consideration to ensure the fish and wildlife habitat conservation areas on and adjacent to this property are protected consistent with the purpose of the Cle Elum Critical Areas Ordinance (Cle Elum Municipal Code 18.01.010), which is to "…protect critical areas and to channel development to less ecologically sensitive areas." At present, WDFW does not believe that the Draft SEIS fully addresses this purpose; a revision to the Draft SEIS incorporating the comments below will assist in ensuring the impacts to wildlife, habitat, and critical areas are fully evaluated, disclosed, and appropriated addressed.

Our comments are as follows:

- Appendix E to the Draft SEIS notes that a biological survey was conducted on October 22, 2019 to update the 2002 information on habitats and wildlife use. A one-day survey during one season of the year does not capture the diverse fauna that likely occurs on this site. Seasonal use by birds, mammals, amphibians, and reptiles need to be considered and evaluated with well-planned and comprehensive wildlife studies. We note that the IPAC report attached to Appendix E also shows that numerous species would not likely be present in mid-October, at the time of the survey. **WDFW recommends that more comprehensive wildlife surveys occur to better document actual wildlife use of the project area throughout the seasons to capture life stages such as breeding, calving, foraging, etc. Such surveys should be conducted over the four seasons and include multiple dates to best capture the diverse fauna that may be present.** 1

- The Draft SEIS, including Appendix E, does not sufficiently address the potential impacts to all federally and state listed species, Priority Habitats and Species (PHS), or Species and Habitats of Greatest Conservation Need (SGCN and HGCN) as identified in WDFW's State Wildlife Action Plan. **WDFW recommends that a more thorough Draft SEIS include an updated and comprehensive review for potential impacts to federal and state listed species, all PHS likely to occur on or near the property, and the Habitats and Species of Greatest Conservation Need.** 2

- WDFW is concerned that the proposed project will impede the ability for wildlife to safely move through the completed project area. Elk have been the primary focus in the analyses to date, but numerous other wildlife are likely to use the project area as a connection to adjacent habitats as well. The Washington Wildlife Habitat Connectivity Working Group's Statewide and Columbia Plateau Analyses identified at least portions of the project area as Habitat Conservation Areas (HCAs) for beaver and western toad and connectivity corridors for mule deer crossing through the project area. **WDFW recommends that the open space corridor along the southern portion of the project be expanded to include areas that are not only the steep slopes. A connection to wetlands 4, 5, and 6 from the widened corridor should be included to ensure a safe movement corridor for all wildlife of all mobilities.** 3

- Numerous wildlife species are likely to be present in or near the project area. Some of these species can be concerning for residents to see. WDFW expects there to be not only large ungulates like mule deer and elk regularly present in or near the project, but also turkeys, black bear, cougar, coyotes, and even wolves. All of these species have the potential to be perceived as nuisance or dangerous wildlife. **WDFW recommends that the proponents proactively take steps to reduce the potential for interactions and conflict between humans and wildlife. Proactive steps could include larger wildlife connectivity corridors, bear proof garbage receptacles, well-signed natural areas, and engaging with WDFW and others for educational materials and outreach events.** 4

- WDFW has been and continues to be a proponent for the protection of the Cle Elum River Corridor Open Space and adjacent open spaces to be protected and managed for wildlife habitat. We support different types of recreation seasonally within these protected areas, but if these open space areas are to be considered mitigation for impacts to wildlife, they need to be managed and maintained for maximum wildlife benefit. **WDFW recommends that the project proponents, in consultation with WDFW, develop and implement a Land Stewardship Plan for all open spaces not already managed by Kittitas Conservation Trust.** 5

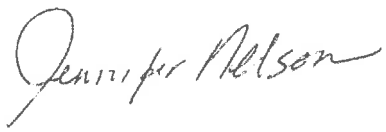
In closing, WDFW finds the Draft SEIS inadequate for determining the impacts to Washington's native wildlife species and habitats present within the project area. We request that the applicant take the following steps to rectify this concern:

1. Design and perform a comprehensive wildlife study/assessment in consultation with WDFW.
2. Re-evaluate the project impacts using findings from the updated wildlife study that includes all PHS, SGCN/HGCN, and listed species information. Mobility for all wildlife through the project should be included in this evaluation.
3. Develop a Land Stewardship Plan which addresses open space management, wildlife movement corridors, planning for wildlife-human interactions/conflicts, recreation planning, and vegetation management.
4. Revise the Draft SEIS with the above information.

6

We look forward to working with the proponents and the City to more thoroughly document species and habitats present, determine impacts, and mitigate for those impacts consistent with the City's purpose statement in the critical area ordinance.

Sincerely,



Jennifer Nelson
Fish and Wildlife Biologist
Jennifer.Nelson@dfw.wa.gov
(509) 961-6639

Washington State Department of Transportation

South Central Region
2809 Rudkin Road
Union Gap, WA 98903-1648
509-577-1600 / FAX: 509-577-1603
TTY: 1-800-833-6388
www.wsdot.wa.gov

November 2, 2020

City of Cle Elum Planning Department
119 West First St.
Cle Elum, WA 98922

Attn: Lucy Temple, Planner

RE: 47° North Draft SEIS
I-90 Exit 80/SR 903/Bullfrog Rd vicinity

WSDOT participated in the early scoping of the proposed project and we appreciate the city and developer's efforts in updating the transportation analysis to accurately evaluate the new project alternatives. We have reviewed the Supplemental Environmental Impact Statement (SEIS) and have the following the comments.

- The subject property is in the vicinity of Interstate 90 (I-90) and State Route 903 (SR 903) and we anticipate the majority of vehicle trips generated by this proposal will utilize these facilities. I-90 is a fully-controlled limited access facility, Highway of Statewide Significance (HSS), and a part of the National Highway System (NHS). SR 903 is a managed access highway generally inside the corporate limits of the City of Cle Elum. It is to the benefit of the state, county, city and proponent to ensure these facilities continue to operate within acceptable safety and operational thresholds. 1

- The transportation analysis incorrectly states the Level of Service (LOS) threshold for I-90 and SR 903 as LOS D. Within the study area, these highways are classified as rural with an operational threshold of LOS C. To accurately evaluate this proposal's impacts, the report must be revised, accordingly. 2

- The safety component of the transportation analysis did not review crash severity. In order to adequately address Target Zero goals and other WSDOT operational objectives, the full range of crash types and severity must be considered. The safety component of the study must be revised to incorporate the AASHTO Highway Safety Manual (HSM) methods and common practices outlined in WSDOT's Safety Analysis Guide. 3

- The SEIS recommends signalizing most of the intersections along SR 903 to preserve the LOS. According to current WSDOT policy, the preferred alternative for intersection control is the roundabout. Any improvement altering intersection control along a state highway, other than a roundabout, must be in accordance with a 4

WSDOT-approved Intersection Control Evaluation (ICE) report, as outlined in WSDOT Design Manual Chapter 1300.

Further, some the locations recommended for signalization are minor, local access streets and may not warrant additional control (traffic signal, roundabout, etc.) along the state highway legs of the intersection. Prior to establishing mitigation alternatives, ICE reports must be performed and included in the final SEIS. 4 cont'd

- The SEIS primarily relies on pro-rata share contributions to mitigate the project's impact to the affected transportation system, a strategy which WSDOT encourages local agencies utilize in order to minimize the mitigation required for any one development. However, when a land use proposal is shown to cause a highway to fall below the established Level of Service (LOS) threshold, WSDOT considers this to be a probable significant adverse impact to the state highway system. In these cases, pro-rata share contributions are no longer sufficient and the development should be responsible for the entire cost of mitigating these impacts.

  The following is a list of impacted intersections, partially or entirely within WSDOT's jurisdiction that warrant further review. The list includes WSDOT's initial expectations for mitigation. It is important to note, improvements are not assumed to be, or limited to, traffic signals or roundabouts. We anticipate several of these locations can be brought into compliance with minor revisions, such as turn-lanes, revised stop-sign placement, turning movement restrictions, etc.

  - **I-90 Exit 80 EB ramp terminal.** FEIS Alt. 5 was originally required to contribute a pro-rata share towards revising the existing stop-control at this intersection. As stated above, the LOS threshold for this facility is LOS C and SEIS Alt 6 is shown to cause this intersection to fall below the threshold by 2031. Therefore, SEIS Alt. 6 mitigation measures must include performing an ICE and funding 100% of any necessary improvement(s) to preserve LOS for all legs of the intersection by 2031. 5
  - **I-90 Exit 80 WB ramp terminal.** This intersection is shown to operate below the LOS threshold with SEIS Alt. 6 and SEIS Alt. 5 by 2037. Mitigation measures for these alternatives must include performing an ICE and funding 100% of any necessary improvement(s) to preserve LOS for all legs of the intersection by 2037.
  - **SR 903/Denny Ave intersection.** SEIS Alt. 6 causes this intersection to operate below the LOS threshold by 2031. Therefore, SEIS Alt. 6 mitigation measures must include 100% funding for any necessary improvements to preserve LOS along the SR 903 legs of the intersection by 2037.
  - **SR 903/Ranger Station Rd intersection.** The analysis indicates this intersection will fall below the LOS threshold due to background traffic growth with or without the proposed project. SEIS Alt. 6 mitigation measures

must include 100% funding for any necessary improvements to preserve the pre-project level of delay along the SR 903 legs of the intersection.

- **SR 903/N Pine St intersection.** This intersection is shown to operate below the LOS threshold with SEIS Alt. 6 and SEIS Alt. 5 by 2025. Mitigation measures for these alternatives must include performing an ICE and funding 100% of any necessary improvement(s) to preserve the LOS along the SR 903 legs of the intersection by 2025.
- **SR 903/N Stafford Ave intersection.** The analysis indicates this intersection will fall below the LOS threshold due to background traffic growth with or without the proposed project. SEIS Alt. 6 mitigation measures must include 100% funding for any necessary improvements to preserve the pre-project level of delay.
- **SR 903 (W. 2nd St.)/N Oakes Ave intersection.** The analysis indicates this intersection will fall below the LOS threshold due to background traffic growth with or without the proposed project. SEIS Alt. 6 mitigation measures must include 100% funding for any necessary improvements to preserve the pre-project level of delay.
- **SR 903/E Pennsylvania Ave intersection.** The analysis indicates this intersection will fall below the LOS threshold with SEIS Alt. 6 and SEIS Alt. 5 in 2031. Mitigation measures for these alternatives must include performing an ICE and funding 100% of any necessary improvement(s) to preserve the LOS for the SR 903 legs of the intersection.

5 cont'd

Prior to issuing the final SEIS, we encourage the proponent and city to collaborate with WSDOT to further refine the list of necessary improvements and ensure an effective use of developer contributions. We recognize the rapid growth occurring in upper Kittitas County and are willing to take advantage of any opportunity to utilize pro-rata share contributions to lessen the burden on any one development, while ensuring higher-priority intersections are adequately addressed.

6

Thank you for the opportunity to review and comment on this SEIS. If you have any questions regarding this letter, please contact Jacob Prilucik at (509) 577-1635.

Sincerely,

Paul Gonseth

Paul Gonseth, P.E.
Region Planning Engineer

PG: jjp

cc: File
Mick Krahenbuhl, Area 1 Maintenance Superintendent
LisaRene Schilperoort, Region Traffic Engineer

H-02

Letter L-4

Cle Elum – Roslyn – South Cle Elum Police Department

In The Heart of the Cascades — *Chief of Police – Kirk Bland*

807 W Second St ♦ Cle Elum, WA 98922 ♦ 509-674-2991 ♦ Fax 509-674-2918 ♦ Dispatch 509-925-8534

policerecords@cityofcleelum.com

October 20, 2020

SEPA Responsible Official

City of Cle Elum

119 W 1st St

Cle Elum, WA 98922

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

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

I would like to note that the costs provided in the DSEIS are not consistent with the true costs I had previously submitted, nor was the number of Officers required to mitigate the impacts this development would create on the Police Department. I disagree with the simplistic approach of modeling staffing needs based on the officers/population modeling method. This simple modeling method is not recommended by the ICMA (International City/County Management Association) and is viewed, "As easy as it is to comprehend and apply, this model is equally inefficient and unreliable." This modeling concept is discussed in a paper written by Dr James McCabe who is a Senior Associate for the ICMA. 1

I included Dr. McCabe's paper in my SEIS staffing model as a reference to support the workload-based model of staffing that the Cle Elum Police Department has adopted to adequately staff the Police Department. Although the DEIS mentions that they received my submission for staffing needs based on this modeling technique, none of their charts, numbers, or information reflect that this modeling method is being utilized. The ICMA is a strong advocate to a workload-based approach "as it relies on actual levels of demand for Police services and matches the demand with the supply of Police resources." 2

Cle Elum – Roslyn – South Cle Elum Police Department
In The Heart of the Cascades *Chief of Police – Kirk Bland*
807 W Second St ♦ Cle Elum, WA 98922 ♦ 509-674-2991 ♦ Fax 509-674-2918 ♦ Dispatch 509-925-8534
policerecords@cityofcleelum.com

The DSEIS report shows that there will be a need for 6.7 Officers by the year 2051 when development will be completed for Alt 5 and 5.5 Officers for Alt 6 by the year 2037. By using the modeling method I had submitted and provided supporting documentation for this modeling method, the number of Officers needed for Alt 5 clearly shows the need for 12 Officers by 2044 and 8 Officers for Alt 6 by the year 2030. There is obviously a large discrepancy between these two modeling methods. I encourage you to review the paper written by Dr McCabe on this topic for a better understanding on how to more efficiently and reliably staff for a Police Department. As Dr McCabe states in this paper, "Relying on antiquated and unreliable methods to make one of the most financially important and critical decisions with respect to the quality of life and safety of a community is ill-advised." 3

Another factor regarding the officer/population approach for staffing levels referenced in the DSEIS states that this approach is based on the existing police officers/population. I again argue this in not a responsible equation to use because it is based on the EXISTING police officer/population equation. The Cle Elum Police Department is currently understaffed for the current population. Therefore utilizing this ratio of police/population will only worsen as more citizens move into the development. A quick search into the FBI database shows that the City of Cle Elum falls under a Group VI city with a population under 10,000 citizens. The chart provided by the FBI shows that the average number of officers per 1,000 citizens in cities under a total population of less than 10,000 people is 3.5. The DSEIS states that the population of the cities the Cle Elum Police Department currently serves is just over 3300 people. Therefore, by applying the officer/population ratio as a staffing model, the current staffing of the Cle Elum Police Department would be 11.5 Officers. 4

The DSEIS also states that this development could bring 1,334 residential units with an estimate of 2.5 people per unit for a total of 3,335 people. This would basically double the amount of population and double the footprint of our current jurisdiction. By using the officers/population modeling method preferred by the writers of the DSEIS of 3.5 Officers/1000 citizens, this would indicate a need of 11.5 Officers, not 6.7 as shown on Chapter 1 Page 1-12. 5

The DSEIS also shows a "one-time cost of $25,000/FTE was also assumed for vehicles/equipment". I am not sure how this number was derived, but this dollar amount does not reflect the true cost of a vehicle and equipment for a Full Time Employee (FTE). I have recently priced and submitted for lease/purchase for a patrol vehicle and the bid I had received was just over $53,000 plus tax per vehicle. I am assuming that this figure was overlooked and the $25,000 figure documented in the DSEIS was based solely on equipment and training costs per FTE upon hiring and did not include the cost of a patrol vehicle. 6

Cle Elum – Roslyn – South Cle Elum Police Department

In The Heart of the Cascades *Chief of Police – Kirk Bland*

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

Another point I would like to mention that has not been addressed thus far is the need for additional Office/Records staff. I have been asked for input on the need for additional Police Officers caused by the impact of the 47 North development and the costs associated with adding more Police Officers, but there has been no inquiry on how this development will affect our front office staff. Currently we have one full time Executive Assistant/Records Manager and one part-time Records Technician. Once more Officers are added to handle the increased work load, the office staff will experience an equivocal amount of additional work. The projected need for additional office staff would be a full time Executive Assistant, a full time Records Manager and a full time Records Technician. This can be accomplished by hiring a new person to fill the Records Technician position and making our current part time Records Technician a full time employee with the title of Records Manager. 7

Upon completion of hiring the necessary Police Officers and front office staff, it would necessitate a larger building to accommodate staff. Our current building was not designed or built with the expectation of increasing staffing to these levels. I have not researched the costs associated to fund a new building or adding on to the existing building. 8

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

Respectfully,

Kirk Bland

Chief of Police

Kirk Bland

From: Lucy Temple
Sent: Monday, October 12, 2020 3:30 PM
To: Kirk Bland
Cc: Robert Omans; Jay McGowan
Subject: FW: Police chief questions

Kirk,
Please see the response from the consultants below. I spoke with Richard Weinman this morning regarding your concerns and he confirmed that your model was discussed and considered. Please let me know if you have additional questions after you've reviewed the sections of the Draft SEIS referenced below in red.
Lucy

From: Brunner, Gretchen [mailto:gbrunner@eaest.com]
Sent: Monday, October 12, 2020 3:00 PM
To: Lucy Temple
Cc: Richard Weinman
Subject: RE: Police chief questions

Hi Lucy-

Richard asked me to respond to the questions you listed below from the police chief. My responses are shown in red. Richard also asked whether the SEIS Summary said that 4.5 rather than 5.5 police officers would be needed for the proposal. Table 1-1 on page 1-12 of the DSEIS says 5.5 police officers would be needed in 2037 under SEIS Alt. 6, which is consistent with the estimate in the Public Services section using the officer/population approach.

Please forward the responses below to the police chief. If these don't answer his questions, he can provide his questions/comments either directly to us (preferred), or, if he still unhappy, as a written comment on the DSEIS.

Thanks,
Gretchen

From: Lucy Temple <lucy@cityofcleelum.com>
Sent: Monday, October 12, 2020 11:43 AM
To: Richard Weinman <richardw-llc@comcast.net>; Brunner, Gretchen <gbrunner@eaest.com>
Subject: Police chief questions

Hello!
The police chief is very concerned about the 47*N project impacts and corresponding mitigation. He asked me the following questions. Can you help address them?

- Where is the public service cost impact analysis that is referenced on page 51 of the Fiscal & Economic appendix? The analysis is presented in Exhibit 23 in Appendix K – Fiscal and Economic Report (and Table 3.15-2 of the DSEIS section), and shows the estimated police costs under SEIS Alt. 5 and 6 in 2025, 2031, 2037, and 2051 (including the costs of new officers and associated vehicles/equipment needed for the SEIS Alternatives; Appendix B to the report provides the assumptions for the police costs analysis). The estimated officers needed under the alternatives was based on the DSEIS Section 3.12, Public Services, police impact analysis, using the

H-02

officers/population approach. This approach is described in the Methodology sub-section on pages 3.12-1 and 3.12-2 of the DSEIS.

- What was done with the police chief's modeling and how was it incorporated into the analysis? If it wasn't used, why not? What was used and how does it result in 5.5 officers rather than the 8 officers the chief's analysis resulted in? The SEIS presents both the results of the standard officer/population and the police chief's approach for the police officers needed to serve SEIS Alt. 5 and SEIS Alt. 6 (see pages 3.12-16 thru 3.12-17, and pages 3.12-24 thru 3.12-25 of the DSEIS, respectively). The officer/population approach is based on the existing police officers/population. This approach was used in the analysis of costs for police service because the police department does not have an adopted LOS standard, and the officer/population approach is a standard and accepted methodology used in SEPA analyses.

- Is the developer expected to pay $102,000 per officer one time? how would the City pay for that officer in following years? The $102,000 per FTE is assumed each year of the analysis; a one-time cost of $25,000/FTE was also assumed for vehicles/equipment. **The mitigation that is listed for the impacts on the service providers – including on police service – is the execution of separate mitigation agreements and monitoring programs with each provider**.

Lucy Temple, Planner

119 West First Street
Cle Elum, WA 98922
(509) 674-2262 x102
www.cityofcleelum.com

Letter L-5



SEPAResponsibleOfficial

From: Michelle Geiger <planner@ci.roslyn.wa.us>
Sent: Monday, November 02, 2020 12:27 PM
To: SEPAResponsibleOfficial
Cc: Brent Hals; Jeff Adams; Tom Missel; Derek Gruber; Cathy Cook; Geoff Scherer; Nolan Weis; Leah Hadfield; Treasurer
Subject: Comment - 47 Degrees North Proposed Master Site Plan Amendment – Supplemental Draft Environmental Impact Statement

Please accept the following comments on behalf of the Roslyn City Council;

RE: 47° North Proposed Master Site Plan Amendment – Supplemental Draft Environmental Impact Statement

To Whom It May Concern:

The City of Roslyn wishes to submit the following comments in response to the Supplemental Draft Environmental Impact Statement dated September 18, 2020 published by the City of Cle Elum. The City of Roslyn Council has expressed concern and asks that the City of Cle Elum coordinate to establish direct communication with the City to address the increased level of service required from our jurisdiction which is heavily impacted by the increased population, traffic and services discussed in the statement, which are required to support this development proposal. 1

Due to the potential financial impacts and infrastructure improvements identified within the statement, the City of Roslyn Council is requesting coordination and input on the various potential infrastructure impacts, identified within this statement, prior to moving forward with any approvals by the City of Cle Elum. One example of this is that the proposal does not appear to present any financial contribution to infrastructure improvements identified from the developer. While the City of Cle Elum, as the jurisdiction of authority in this case, will make those decisions moving forward, those costs not contributed by the developer would default then to the individual jurisdictions for funding of improvements. The surrounding jurisdictions are identified as having significant impacts, for which the City of Roslyn has not been engaged in discussion and/or coordination to date, beyond that of the general public process. 2

The City of Roslyn would like to have input and direct coordination on those items, which in this case are numerous, that directly impact the infrastructure, environment, and potential long-term fiscal responsibilities, as well as various other elements that a development of this magnitude brings forth in the decision-making process. The area of the proposed development is the foundational connection of the communities of upper County (Suncadia, Cle Elum, South Cle Elum, and Roslyn). Preservation of the environment is essential economic development of growth of these communities and their vitality within the Upper County. The proposed development has been documented to have direct impacts to the City of Roslyn on a variety of levels and we feel that direct input is needed in this process from the Cities, and Towns impacted that extends beyond that of the public process. The City of Roslyn requests that the City of Cle Elum establish open lines of communication moving forward to create and address concerns similar to those discussed here. 3

M. Geiger

CITY OF ROSLYN
201 S. First Street
PO Box 451
Roslyn, WA 98941

Desk Phone: (509) 304-8337

City Hall: (509) 649-3105
Fax: (509) 649-3174

planner@ci.roslyn.wa.us

From: Noah Oliver [mailto:Noah_Oliver@Yakama.com]
Sent: Friday, October 2, 2020 7:22 AM
To: SEPAResponsibleOfficial; Lucy Temple
Cc: Corrine Camuso; Jerry Meninick; Casey Barney; George Selam; Wollwage, Lance (DAHP); Sydney.Hanson@dahp.wa.gov; Delano Saluskin
Subject: 47° North (Bullfrog Flats) Draft EIS and Cultural Resource Inventory Report

Thank you for contacting the Yakama Nation Cultural Resource Program (CRP) concerning the 47° North (Bullfrog Flats) project. The project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855 (12 Stat. 951). The Treaty between Yakama Nation and the United States Government set forth that Yakama Nation shall retain rights to resources upon lands defined therein as Ceded Lands and Usual and Accustomed Places. These Treaty Reserved Rights have been defended and affirmed at the highest level of our judicial system. Yakama Nation continues to exercise Treaty-Reserved Rights to protect traditional resources. 1

The Yakama Nation CRP has reviewed the Cultural Resources Technical Report for titled, *47° North Project Master Site Plan Draft SEIS, Cle Elum, Kittitas County, Washington* for the proposed 47° North Project. We identify several concerns which should be addressed by the archaeological contractor in conjunction with the SEPA project coordinator.

The evaluation conducted by CRC did not fulfill the requests and concerns of Yakama CRP for this project. The Yakama CRP responded to the SEPA on November 4th citing concerns with traditional resources in the area and the need for a cultural resource survey. However, further consultation and the unique survey methods were never conveyed to Yakama Nation or to the Department of Archaeology and Historic 2

Preservation (DAHP). To conduct trench excavations in an area that Yakama Nation has cited as containing significant cultural resources defeats the purpose of the investigation requested. The report does not provide a map to clearly demonstrate the relationship between previously identified sites and testing/trenching locations. It is not clear that the geotechnical/trench excavations did not impact cultural resource sites from the associated cultural resource report. Geotechnical/trench excavations are not acceptable scientific testing standards used to identify the presence or absence of cultural resources in Washington State. The geotechnical work represents the action and not the compliance component of SEPA. Furthermore, the order of operations for this project are not logical to identify cultural resource properties of significance. The project was tested prior to being surveyed and many of the sites were not relocated during survey. The survey should inform the testing and the location of known sites should be assessed before any excavation occurs. While some appropriate shovel tests were conducted, it is concerning that the area surrounding the river was not tested. This portion of the project is considered to be the highest probability area for containing sub-surface precontact cultural resources. 3 4

The report concludes that mitigation measures should be implemented in order to reduce or eliminate potential impacts to significant cultural resources. These include consulting with the Yakama Nation, being compliant with the State law, establishing an IDP, monitoring all ground disturbance, training construction workers in archaeology, and another field investigation of the property when future commercial use is proposed. This interpretation is in part fundamentally flawed and premature at this point in time. A total of 23 cultural resources are located within the project. If a resource is not relocated it should not be presumed not to exist. Not testing the locations of the resources does not lend to an interpretation of the sites eligibility or status. Without consulting with DAHP on the project, an interpretation of eligibility is premature and may not be agreeable or be the best representation in concluding recommendations. Most of the "mitigation measures" identified are requirements, others simply do not serve to mitigate the effects to the resources and therefore are not effective. Finally, the project will impact cultural resources and therefore will likely require mitigation measures, agreements, and/or permits. In this case consultation with DAHP and Yakama Nation CRP is necessary to identify what appropriate measures may be (as a procedure not a mitigation measure). This needs to occur with the appropriate representatives and points of contact, not with the project contractor. 5

Further substantive comments concerning the Cultural Resource Investigation are as follows:

- Contrary to popular belief, the name Cle Elum and other spellings or dialects of name Tlelam do not refer to Swift Water in the Native Language (*Ichishkinsinwit*) belonging to this land. The meaning of Tlelam is known and is specific, however, it is not known as "Swift Water". 6

- The report indicates members of the "Yakama Nation were interviewed to assist in the identification of cultural resources within the UGA". Please clarify this statement (i.e. was this a Yakama Nation Cultural Specialist/Archaeologist or a Tribal Member) and how did this information shape the methods of the survey? 7

- The report identifies the archaeological record extends to 13,000 years BP related with Clovis Tradition sites. Recent work in the Yakima Basin has identified lithic material and points which correlate with the Western Stemmed 8

Tradition – which are understood to have the potential to predate or be contemporaneous with Clovis Tradition. 8 cont'd

• The report indicates monitoring of geotechnical testing was conducted prior to the archaeological survey of the project area. Please provide a map showing location of previously documented sites and testing locations. 9

• Please provide a map of areas surveyed with transects and overview photo locations. 10

• Include an overlay map of subsurface testing in relation to previously identified archaeological sites and newly documented sites. Was any testing completed to define site boundary extents of known resources? Was testing conducted in known sites? 11

• Include a map and summary of each of the 15 archaeological sites within the surveyed area. While the report indicates impact under the SEPA alternatives, there is not a clear understanding as to what each of these resources are (i.e. context, previous work, vertical/horizontal extents and proximity to project components) 12

• In the conclusions, it should be clear to the reader and proponent that under State Law a permit is required to alter/disturb an archaeological site. 13

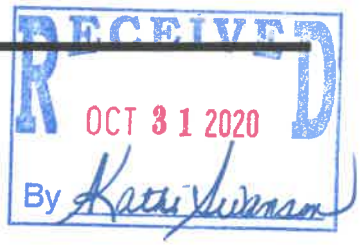
Please provide a revised archaeological report which address the comments and concerns to the Yakama Nation CRP. The Yakama Nation CRP provided interest and concerns regarding cultural resources as the project is in the vicinity of an ancestral village and burial ground. Thank you for your continued and valued consultation. We appreciate your time and understanding regarding this important matter. 14

Sincerely,

Noah Oliver
Yakama Nation Cultural Resources Program

Letter L-7

SEPAResponsibleOfficial



From: Debbie Bogart <executivedirector@cleelumdowntown.com>
Sent: Saturday, October 31, 2020 11:41 AM
To: SEPAResponsibleOfficial
Cc: Marc Kirkpatrick (mkirkpatrick@encompasses.net)
Subject: 2002 Bullfrog Flats Development Agreement

On Behalf of the Cle Elum Downtown Association, and as the Executive Director of the Cle Elum Downtown Association, we are asking to be added to the record agreeing that *"the City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled."*

The community center will add to the quality of life, health and year around recreation for all ages for the residents of Cle Elum. This facility is especially important for those residents who are not members of Suncadia or other residential communities which provide recreational programs, facilities and services. Our children, youth and families need safe places to recreate and engage in healthy choices. 1

Please take immediate action before this opportunity is lost.

Sincerely,

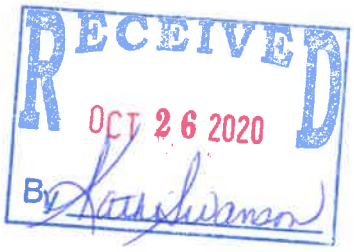
The Cle Elum Downtown Association

Debbie Bogart
Executive Director
123 E First Street
509-433-7330
CLE ELUM DOWNTOWN ASSOCIATION
www.cleelumdowntown.com

Letter L-8

SEPAResponsibleOfficial

From: Michelle Kuss-Cybula <kuss-cybulam@cersd.org>
Sent: Monday, October 26, 2020 4:52 PM
To: SEPAResponsibleOfficial
Subject: 47 North and our YOUTH
Attachments: Letter to City Council.docx



Hello,

Please accept my letter in support of a community center for the youth of our community. As I am not able to attend City Council meetings (they are the same evenings and times as our school board meetings), I hope that you can accept my attached letter about understand my strong request to members of the city council to ensure that you uphold the promise from Suncadia to fulfill their financial obligation and the promise the children and families of our community. 1

Michelle Kuss-Cybula
Superintendent
Cle Elum-Roslyn School District
(509) 649-4850

An opportunity for us to come together and dream big as one community, one voice, is upon us. When moved here as a new member of the community, I spent many hours meeting with individual families, community partners, and local businesses. From those conversations, I discovered a few key themes; this community loves their children and will come together to make things happen on behalf of our children. This community is full of pride and support of our youth, especially when it comes to supporting athletics and youth programs. The children and families of our community deserve a community center. I am writing to publically ask for the support of our community in a collective effort to bring a community center to our neighborhood. With the support from Suncadia and the City of Cle Elum, we have the opportunity to make this dream a reality.

Why a community center? Community centers not only provide opportunities for our youth to explore new activities, engage in healthy lifestyle habits, and make new friends; community centers help strengthen local economies by bringing in new sources of revenues: businesses, families, and partnerships. Having been a Rotarian, educator, and parent- I can attest to the importance of a community center first hand. I have observed relationships strengthen as a result of active community partnerships as the hub of the community. Community centers also provide summer options for childcare, recreation, and after school programming and events. Furthermore, a community center space allows for additional indoor space opening up the opportunities for performing arts and adult education options. This generates revenue and as additional work force opportunities for our community.

1 cont'd

Suncadia promised to give the City of Cle Elum 12 acres expressly for a community center for the residents of Upper Kittitas County, along with related amenities that have been valued by a third party at $5.8 million. Both the City and Suncadia agree that the obligation exists.

We believe that once our community has acquired the land and the $5.8 million promised by Suncadia, we will be able to work together to finally make this dream a reality through a shared vision and belief for our children and our community. I am leaning on our city council and our community to actively engage in this conversation for our children now and for generations to come. Let's not lose this opportunity for our community.

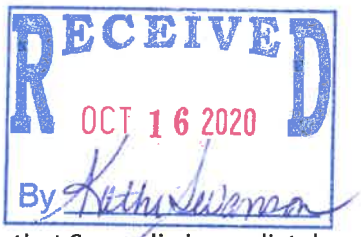
How can you help?

1. Send an email to SEPAResponsibleOfficial@cityofcleelum.com ; **OR**
2. Mail a letter to SEPA Responsible Official at City of Cle Elum, 119 W First Street, Cle Elum, WA 98922; **OR**
3. Call 509-204-3035 and leave a 3-minute or less message.

Michelle Kuss-Cybula

SEPAResponsibleOfficial

From: Lara Gregorich-Bennett <g-bl@cersd.org>
Sent: Friday, October 16, 2020 2:02 PM
To: SEPAResponsibleOfficial



Good afternoon.
I live off Westside road and am principal at Walter Strom Middle School.
It is extremely important that the City of Cle Elum immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1
Thank you for ensuring this is taken care of immediately.

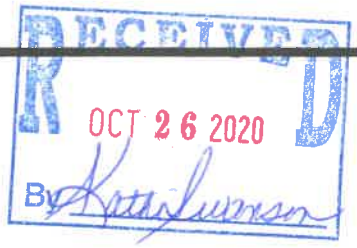
Sincerely,
Lara Gregorich-Bennett

Mrs. "GB"
Lara Gregorich-Bennett
Principal Walter Strom Middle School
K-12 English Language Acquisition Coordinator
K-8 Math Coordinator
Cle Elum/Roslyn School District
(509)649-4800

Walter Strom Middle School
Partnering with parents & community to educate EVERY child at their level to ensure future success, choice, and community citizenship
Achieving greatness
2017 & 2018 Washington State School of Distinction

Letter L-10

SEPAResponsibleOfficial



From: Lara Gregorich-Bennett <g-bl@cersd.org>
Sent: Monday, October 26, 2020 6:52 PM
To: Kathi Swanson; SEPAResponsibleOfficial
Subject: 47 North Project

Good evening.I spoke at this evening's City Council Meeting and am submitting comments to you regarding the 47 North Project and asking that the project not procede until Suncadia fulfills their obligations to our community.
The City and Suncadia agree that the 12 acres and $5.8 million obligation exists. It is the City's responsibility to enforce this agreement.
This is an exciting opportunity for our community! This is a huge benefit for our children!
Seize the day & make a huge impact for our growing community. An opportunity like this will not present itself again. 1

I implore the City to do their due diligence and enforce this agreement. The City must not procede with further agreements with Suncadia until this obligation is met.
Thank you for standing up and fulfilling this need for our community!

Sincerely,

Lara Gregorich-Bennett
Principal, Walter Strom Middle School

SEPAResponsibleOfficial

From: Sean Northrop <sean@trailsidehomes.com>
Sent: Monday, November 02, 2020 9:57 AM
To: SEPAResponsibleOfficial
Cc: NRogers@Cairncross.com; Brett Pudists; John Fernstrom
Subject: 47 Degrees North SEIS comment
Attachments: 201102-City Heights Holdings comment on 47DegNorth SEIS.pdf

RECEIVED
NOV - 2 2020
By Kathy Lubmen

Good morning, please see the attached comment letter on behalf of City Heights Holdings LLC on the Draft SEIS for 47Degrees North project.
Please confirm you can add my email address to the distribution list for any future communications about the project.
Thank you and have a great Monday-

TRAILSIDEHOMES
Sean Northrop
Founder, CEO
116 ½ South Washington Street, Seattle, WA 98104
M: 206.459.3490
www.TrailsideHomes.com
www.TrailsideCollection.com

City Heights Holdings, LLC
PO Box 4279
Seattle, WA, 98194

November 2, 2020

Via e-mail

Lucy Temple
City Planner & SEPA Responsible Official
City of Cle Elum
SEPAresponsibleofficial@cityofcleelum.com

RE: Comments on Draft SEIS for Proposed 47° North project by Sun Communities Inc.

Dear Ms. Temple:

As you know, my company, City Heights Holdings, LLC, is developing the City Heights project in the City of Cle Elum. The west end of the City Heights project will be located near the proposed 47° North project, just east of the Cle Elum Pines development. We generally support the 47° North project, however we have a few concerns about what is currently proposed.

Access Point to SR 903

The 47° North access point to SR 903 has moved farther northwest from where it was originally proposed for the Bullfrog Flats project. The Draft SEIS for 47° North does not clearly address how moving that access point functions with the already planned and approved access points for City Heights and Cle Elum Pines. In addition, the Draft SEIS does not evaluate the potential safety risks of the resulting series of "T" intersections with SR 903. 1

The proposal may conflict with the previously planned and approved access points to SR 903. As was assumed in the Cle Elum Pines project analysis, City Heights northwest access could be combined with the main Cle Elum Pines access. However, City Heights also has an option to take access via Alliance Road. The Final EIS for 47° North should describe how its now re-aligned access point on SR 903 would meet WSDOT spacing requirements with the other potential and constructed access points. 2

We recognize that City Heights projected traffic intended to use the northwest access onto SR 903 is not a significant amount of trips and is not needed for the initial phase of the City Heights project that is currently under review. In fact, this access point could be used only as an emergency access route, or it could be a formal access to serve only the westernmost development pod of the City Heights development. However, the City Heights access points and trips do need to be considered in the 47° North SEIS. 3

Signalization or Roundabout

Signalization and/or the use of a roundabout at the 47° North access point on SR 903 also should be included in the EIS analysis. The Draft SEIS lacks analysis as how the proposed traffic signal could affect operations at the other potential and constructed access points described above. In addition, WSDOT may require a roundabout instead of a traffic signal, therefore, the same type of analysis should be performed for a roundabout. 4

Thank you for your attention to these comments.

Very truly yours,

Sean Northrop
City Heights Holdings, LLC

H-02

Letter L-12

SEPARe- -nsibleOfficial:pe

RECEIVED
NO - 2 2020
B

From: Mike Swenson <mike.swenson@transpogroup.com>
Sent: Monday, November 02, 2020 1:26 PM
To: SEPAResponsibleOfficial
Cc: Maris Fry; Beck, Roger
Subject: 47 North SDEIS Review Letter
Attachments: 47 North SDEIS Review Letter - Nov 2020.pdf

On behalf of New Suncadia LLC the attached documents includes a review/comment letter regarding the 47 North SDEIS. This letter outlines two fundamental comments for your review and consideration.

Thank you and we appreciate your consideration.

Mike Swenson PE, PTOE Principal
425-896-5208 206-909-5785 425-821-3665
mike.swenson@transpogroup.com

transpo group

transpogroup
WHAT TRANSPORTATION CAN BE.

TG: 1.20285.00

November 2, 2020

SEPA Responsible Official at City of Cle Elum
119 First Street
Cle Elum, WA 98922

SUBJECT: 47° NORTH DSEIS REVIEW

Dear SEPA Responsible Official:

On behalf of New Suncadia LLC, we have reviewed the transportation components of the 47° North Proposed Master Site Plan Amendment Supplemental Draft Environmental Impact Statement (SDEIS) prepared by the City of Cle Elum in September of 2020. Specifically, our review focused on the proposed mitigation and pro-rata calculations associated with the identified transportation improvement. *See* DRAFT SEIS at Table 3.13-20. We understand that the traffic analysis included in the SDEIS reviews the cumulative impacts of SEIS Alternative 6 which includes elements proposed by 47° North and a Commercial Site of 25 acres to be potentially developed by Suncadia. The comments outlined below pertain to the identified development-related improvements and the methodology surrounding the pro-rata financial contributions of such improvements.

The two key comments/concerns are as follows:

- Financial contributions and pro-rata contributions should account for background traffic in the calculations for all horizon years as was proposed for the short-term analysis period.
- The 100% contribution limit for the Bullfrog Road/I-90 EB ramps, Bullfrog Road/I-90 WB ramps, Bullfrog Road/Tumble Creek Dr, and Pennsylvania Ave/1st Street intersections is unsubstantiated in the traffic analysis prepared by TENW. Since timing of the commercial development is speculative, it should follow the methodology used in the earlier horizon years.

Further discussion on each item is included in the following sections.

General Pro-Rata Methodology

While it is understood that improvements will be triggered by 2031 and 2037 with development of SEIS Alternative 6 (including 47° North and the potential Commercial Site), the methodology surrounding the pro-rata financial contribution should consider background trips as it is a contributing factor to the long-term intersection deficiencies. We note that in an earlier version of the Draft EIS, the Summary of Mitigations Measures Table included a background share for all improvements, not just those that are needed in the "Baseline Conditions". A copy of that Table is attached to this letter (Attachment A). This approach to background levels is recommended for the Final EIS, such that the financial burden of improvements does not fall solely on the development project and that the pro-rata share is based on the proportionate split of background trips, 47° North trips, and Commercial trips at each intersection. This is consistent with the SEPA principle that mitigation measures should be both reasonable and proportional to the impacts of the project. WAC 197-11-660(1), adopted by reference in Cle Elum Municipal Code 15.28.230. 1

It should also be noted that the development program and build-out timeline of the Commercial Site is speculative (Table 18, Page 48, Appendix J), but those assumptions serve as the basis for the pro-rata share percentages outlined in Table 2

25 of Appendix J (Page 65). This letter aims to provide input on the methodology used to determine the pro-rata financial contribution, but expects that additional detail, particularly as it relates to specific triggers (i.e. trip counts) and monitoring, will be determined as part of the Master Site Plan and/or Development Agreement amendment process. 2 cont'd

2037 Pro-Rata Calculations

Sufficient evidence has not been provided in the DSEIS to conclusively suggest that 100 percent of the financial contribution for improvements triggered in 2037 should be allocated to the what the Draft SEIS acknowledges is at this point only a speculative and hypothetical development scenario for the Commercial Site because no proposal has been submitted for that site. *See* DRAFT SEIS at 2-14 and 2-22. A baseline analysis has not been provided that outlines the operations of these intersections in the year 2037 without traffic generated by the Commercial Site. It is therefore not clear if the intersections would meet the necessary operational requirements without development of the Commercial Site (i.e. with background trips and 47° North, but not the Commercial Site). As such, it is recommended that once a monitoring plan is prepared and amendments to the Master Site Plan and/or Development Agreement are finalized, the respective pro-rata financial contribution for the 2037 improvements, consistent with the methodology outlined above, should be based on the proportionate split of background trips, 47° North trips, and Commercial Site trips at each intersection. 3

Sincerely,
Transpo Group USA, Inc

Michael Swenson, PE, PTOE
Principal

Attachment A:

Previous Draft EIS Summary of Mitigation Measures Table

Table 3-23
SUMMARY OF MITIGATION MEASURES FOR SEIS ALTERNATIVE 6

Location	Potential Improvement to mitigate LOS Deficiency[1]	Scenario for which Mitigation is Necessary			Estimated Year Required	SEIS Alt 6 Estimated Pro-Rata Share [2]		
		Background	With SEIS Alt 5	With SEIS Alt 6		Background [2]	47° North	Commercial
#1 – Bullfrog Road / I-90 EB Ramps	Traffic Signal		✓	✓	2037	69%	**15.50%**	15.50%
#2 – Bullfrog Road / I-90 WB Ramps	Traffic Signal			✓	2037	76%	**12.00%**	12%
#3 – Bullfrog Road / Tumble Creek Dr	Refuge lane on Bullfrog Rd for left-turns exiting Tumble Creek		✓	✓	2037	75%	**12.50%**	12.50%
#7 – Denny Ave / W 2nd Street (SR 903)	Center turn-lane on SR 903		✓	✓	2031	47%	**34.00%**	19%
#8 – Ranger Station Rd / Miller Ave / W 2nd Street (SR 903)	Traffic Signal or Roundabout		✓	✓	2025	52%	**42.00%**	6%
#9 – N Pine Street / W 2nd Street (SR 903)	Traffic Signal or Roundabout		✓	✓	2031 [4]	56%	**28.00%**	16%
#11 – Douglas Munro Blvd / W 1st Street	Traffic Signal or Roundabout	✓			2025	80%	**17.00%**	3%
#12 – N Pine St / W 1st Street	Traffic Signal or Roundabout	✓			2025	74%	**23.00%**	3%
#13 – N Stafford Ave / W 2nd Street (SR 903)	Traffic Signal or Roundabout	✓			2025 [4]	61%	**34.00%**	5%
#15 – N Oakes Ave / W 2nd Street (SR 903)	Traffic Signal or Roundabout	✓			2031 [3]	72%	**18.00%**	10%
#21 – Pennsylvania Ave / 1st Street (SR 903)	All-Way Stop or Traffic Signal		✓	✓	2037	71%	**14.50%**	14.50%
#30 – SR 903 / New Connector Road [5]	Turn-lanes on SR 903 (2nd Street) and traffic signal or roundabout			✓	2031	43%	**36.50%**	20.50%

Letter L-13

SEPAResponsibleOfficial



From: Spencer Crabb <scrabb@atwell-group.com>
Sent: Monday, November 02, 2020 4:49 AM
To: SEPAResponsibleOfficial
Cc: Kurt Beleck
Subject: 47 North - Draft SEIS Comments

To Whom it May Concern,

Below are my formal comments to the 47 North Draft SEIS.

Section 3.8.-13 has language specifically about areas of screening. We believe it should be changed to read something along the lines of: 'visibility of the proposed development will rely on existing vegetation and buffering to screen views as much as practical'. The current language seems to paint a broader picture of consistent screening. 1

Section 3.9 contains a suggestive calculation of the single family homes, coming to the conclusion that the monthly payments may fall in the affordable housing designation. This is somewhat misleading, as lot rent has been left out of the calculation of total monthly expenses. Sun Communities will endeavor to provide the SEIS team with a potential range of lot rent costs. Please keep in mind that the cost range provided is subject to change due to development costs, final project requires, and other outstanding factors. 2

The methodology behind table 3.13-20 does not appear to appropriately capture the mitigation measures for the failures in the "background" condition. If an intersection is failing in the background condition, a mitigation should be identified for the background condition. This mitigation is not the responsibility of the proposed development. Subsequently, the build alternatives should be analyzed with the background mitigations in place to determine the impact attributable to the alternative. If the intersection then fails, the proposed development would be required to mitigate. If the intersection meets standards, the proposed development would not be required to pay a proportional share. 3

The methodology behind table 3.13-19/20 does not appear to appropriately capture the additional capacity that is gained from the suggested improvements.. If the suggested improvement adds capacity beyond what is required for the proposed development, the proposed development should not be responsible for the entirety of the cost of the improvement. 4

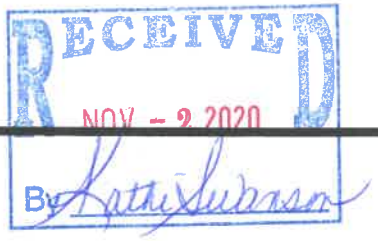
Section 3.13-4 is vague regarding the methodology that will be used in the future to refine the projects proportional share requirements for the required improvement measures (mitigations). Please include a robust discussion of the proposed methodology for calculating proportional share. 5

Section 3.13 appears to be calculating RV traffic counts as a week day at 100% capacity. This assumption is incorrect as occupancy would typical be lower on week days, based upon historic data. Additional occupancy data from similar resorts in Sun RV Resort portfolio can be provided to reflect this. 6

Spencer Crabb
Development Manager
ATWELL, LLC
248.447.2062 Tel
586.943.0003 Mobile
248.447.2001 Fax
Two Towne Square | Suite 700 | Southfield, MI 48076
www.atwell-group.com

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Letter L-14



SEPAResponsibleOfficial

From: Leslie Thurston <director@wahorsepark.org>
Sent: Monday, November 02, 2020 2:19 PM
To: SEPAResponsibleOfficial
Subject: Comments on SEPA Review of Proposed 47 North Development
Attachments: SEPA 47 North Response Ltr 11-2-20.docx; 2019 Horse Park Visitors by Zip Code of Residence.pdf

Please find attached our letter and attachment related to the above. Please acknowledge receipt of this email, and thank you for your attention.

Sincerely,
Leslie Thurston
Executive Director
Washington State Horse Park
PO Box 278, Cle Elum, WA 98922
877-635-4111
www.wahorsepark.org
501(c)3 Tax ID 33-1197391

H-02

WASHINGTON STATE
HORSE PARK

SEPA Responsible Official
City of Cle Elum
119 W. First Street
Cle Elum, WA 98922

Re: Proposed 47 North Development

Dear SEPA Responsible Official:

We are responding to the supplemental environmental impacts analysis conducted of the 47 North Master Plan Project proposed by Sun Communities LLC for development of Bullfrog Flats area. This new Plan is being evaluated in comparison to site plan Alternative 5 of Trendwest's Final EIS approved in 2002 which did not include land donated for and development of the Washington State Horse Park ("WSHP").

Background

In 2008 Suncadia donated 112 acres of the 175 acre Reserve parcel to the City of Cle Elum for development and operation of the WSHP by the Washington State Horse Park Authority ("WSHPA"). The WSHP opened for operation in 2010 and has since become a major destination for the Northwest horse sports community, attracting a wide range of English and western activities involving over 30,000 visitors annually who contribute more than $3m of economic benefit. The majority of these visitors make use of the extensive trail system that exists throughout the Bullfrog Flats area. These trails wind through beautiful woodlands and, most importantly, are "horse-safe": i.e., they are not used by bikers or other non-pedestrians, have good dirt surfaces on gentle terrain, are well-maintained, and do not intersect any vehicle roads. These important riding trail features make the WSHP a uniquely attractive destination for recreational and competitive horse people alike who come from all across the Northwest region and beyond (see attachment A which maps WSHP visitors by residence). 1

Proposed 47 North Master Plan Impacts

Following are significant concerns of the WSHPA regarding impacts of the proposed 47 North development on WSHP operations:

1. Safe and functional equestrian trail access throughout and across the land being purchased.

   It appears from the 47 North Conceptual Land Plan (E) that only one short trail (connecting the WSHP to the Bullfrog Road tunnel and Bonneville powerline) is designated "equestrian", and that all the other trails are presumably multi-use. Whether that is the intent or not, the trail system depicted throughout the proposed manufactured housing and RV developments either traverse sloping terrain (it is very difficult to safely build, maintain and use horseback riding trails that run across a hillside), or are immediately next to and crossing roadways. Placement of riding trails in these circumstances raises serious safety concerns, especially when combined with other types of trail users (runners, cyclists, walkers, youth, etc.). 2

2. We have a particular interest in the proposed uses of the "Additional Open Space" to the west of the RV park and above the steep slope. This area of woodlands and open glades has long been heavily used by trail riders and is considered a significant asset by that large community which includes many locals. 3

3. Two Public Trail Parks are indicated in the Managed Open Space ("MOS") to the west and a third one is indicated adjacent to the slope road the WSHPA constructed to connect WSHP to the MOS land it uses for trails and competitions space. We need to understand the intended location, design, users and uses of these Public Trail Parks, and how access to them will be controlled during WSHP events. 4

4. What, if any, development is envisioned/intended for the 8 acre parcel in the Northeast corner of WSHP adjacent to the new covered arena? 5

5. Traffic congestion already is a major issue at the intersection of Douglas Munro Blvd. and West First St. and at the intersection of Ranger Station Rd. and Rt. 903. Traffic from construction activities and developed properties will further impact these important routes leading to increased risk of accidents as well as bottlenecks that would significantly delay or prevent egress in case of emergency. We believe traffic mitigation plans and timetables for these intersections should be part of the 47 North Master Plan Project review and approval process. 6

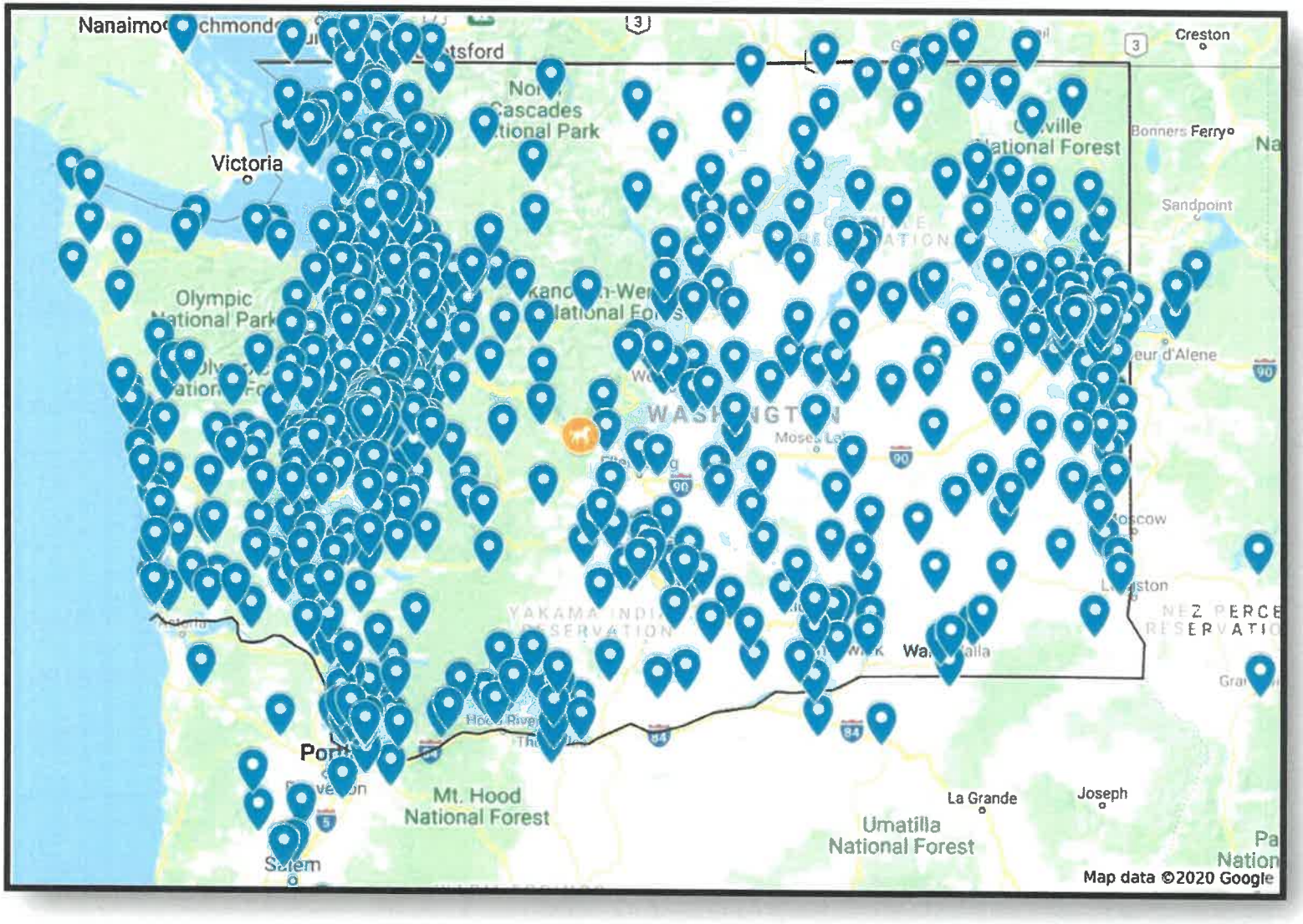
In closing, we believe there is sufficient land not designated for development that can meet the needs of horseback riders as well as other users, and we welcome the opportunity to work with the applicant to create safe, functional space that continues to attract and serve the large and growing community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

Sincerely,

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

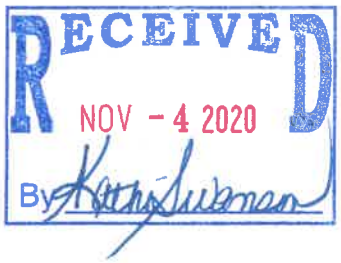
Att: WSHP Users by Residence

2019 Horse Park Visitors by Zip Code of Residence



SEPAResponsibleOfficial

From: Josh Fredrickson
Sent: Wednesday, November 04, 2020 9:30 AM
To: SEPAResponsibleOfficial
Subject: 47 Degree North TIA
Attachments: Comments 10302020.doc



Please see attached comments regarding the TIA for the 47 Degree North TIA.

Thanks.

Joshua Fredrickson
County Engineer
Kittitas County

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message id: 38cb45916c6dcbdac24bb8719d004a14

KITTITAS COUNTY
DEPARTMENT OF PUBLIC WORKS

Mark R. Cook, PE Director

October 30, 2020

RE: 47° North Draft SEIS
Traffic Impact Study Comments

Below are comments relating to the Transportation Analysis completed by Transportation Engineering NorthWest for the 47° North Draft SEIS.

1. New intersection on SR 903 appears to be close to the new upper county shop. If this is the case any mitigation should take into consideration large trucks turning in and out. 1
2. The model predicts people will not use the new connector road but will continue to use Bullfrog and SR 903 because of the lower speed on the connector road. A low speed limit on the connector road won't slow people based on observations of people consistently speeding on Bullfrog. More intersections and winding roads would likely be necessary to create the desired outcome. 2
3. I-90 Ramps are projected to jump from LOS C in 2025 to LOS E/F in 2031 on the baseline estimates. This seems unlikely based on observations. 3
4. Pro-rata share contributions only compare weekday PM peak hour conditions. Friday summer peak hour conditions aren't compared because it isn't typical to design for conditions that only occur for a couple of hours during a certain time of year. Additional intersections which will require mitigation for Friday and Sunday peak hour conditions by 2031 include: 2025 Friday I-90 EB Ramp/Bullfrog; 2025 Friday N Oakes Ave/W 2nd St; 2031 Sunday Bullfrog/ Tumble Creek Dr; 2031 Sunday Suncadia Roundabout. The new development will contribute to these out of compliance intersections before the project is built out, so should 47° share any of these costs? 4

411 N. Ruby St, Suite #1
Ellensburg, WA 98926

TEL (509) 962-7523
FAX (509) 962-7663

Individuals Letters

Letter L-16

SEPAResponsibleOfficial

From: Nicole Ahola <nahola77@gmail.com>
Sent: Wednesday, October 28, 2020 9:08 PM
To: SEPAResponsibleOfficial; jordan ahola
Subject: City of Elum Community Center



City Officials,

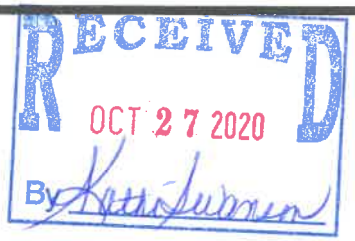
The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Jordan & Nicole Ahola - Cle Elum Residents & Business Owners
NICOLE M. AHOLA

P 253.332.5221 E nahola77@gmail.com

Letter L-17

SEPAResponsibleOfficial



From: Connie Anderson <connieand123@gmail.com>
Sent: Tuesday, October 27, 2020 10:04 AM
To: SEPAResponsibleOfficial
Subject: community center

I'm writing in support of the demand that Suncadia fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million for a community Center to Cle Elum. How could 18 years go by without this action? I thought this had occurred 18 years ago! Please take immediate legal action Now to benefit our entire community. The citizens in the upper county would finally get a Community Center instead of another housing development. And a Community group stands ready to build a facility using grants and private funds. Please take immediate action for the citizens of our communities. Thank you, 1

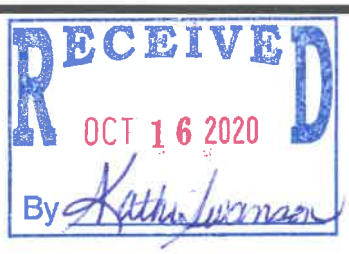
Connie Anderson

Letter L-18

SEPAResponsibleOfficial

From: Dawn Bass <dawn_zierke@hotmail.com>

Sent: Friday, October 16, 2020 12:38 PM
To: SEPAResponsibleOfficial
Subject: 2002 Bullfrog Flats Agreement



Dear City Officials,

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Please act on this ASAP as our community will benefit greatly from having additional amenities that are a draw in other communities. It is not right that we have this opportunity just sitting there and have to drive to other communities to access resources such as a pool as one example. The distance to reach these amenities is a huge barrier for those in need, especially in winter driving conditions! Please get our community what we deserve!

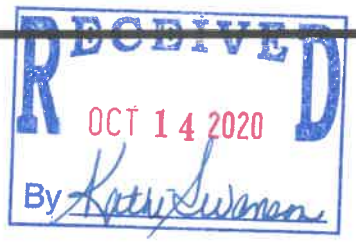
Respectfully,

Dawn and Guy Bass
509-899-2561

Sent from my iPhone

Letter L-19

SEPAResponsibleOfficial



From: Mike <mikebates509@gmail.com>
Sent: Wednesday, October 14, 2020 7:30 PM
To: SEPAResponsibleOfficial
Subject: Suncadia responsibility to Cle Elum

I was just made aware of a responsibility that Suncadia has to the city of Cle Elum to donate 12 acres of land and 5.8 million dollars for a community center. Why is the city not holding Suncadia accountable to this promise? Make Suncadia do what they have committed to do! 1

Mike Bates

Sent from my iPhone

Letter L-20

SEPAResponsibleOfficial

From: Melissa Becker <Melissa.Becker@cwu.edu>

Sent: Tuesday, October 13, 2020 2:33 PM
To: SEPAResponsibleOfficial
Subject: Bullfrog Flats/47 North

RECEIVED
OCT 13 2020
By Kathi Swanson

The City of Cle Elum should immediately demand, in good legal form, that Suncadia immediately transfer 12 acres and $5.8 million for a community center, as specified in the 2002 Development Agreement for Bullfrog Flats.

All discussions regarding Bullfrog Flats should cease until the City of Cle Elum has received what was promised for a community center.

1

Letter L-21

SEPAResponsibleOfficial



From: FRED BENSON <84y@bellsouth.net>
Sent: Wednesday, October 14, 2020 9:54 AM
To: SEPAResponsibleOfficial
Subject: Suncadia obligation must be fulfilled!

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Fred and Lisa Benson
2631 Summit View Road
Cle Elum, WA 98922
678-571-0496

Letter L-22

SEPAResponsibleOfficial

From: Jessica Berry <jberry@inlandnet.com>

Sent: Monday, October 19, 2020 10:19 AM
To: SEPAResponsibleOfficial
Subject: SEPA Sun Communities/Suncadia Land Sale

RECEIVED
OCT 19 2020
By Kathi Johnson

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 Million, expressly for a community center, to the City of Cle Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Thank you

Jessica Berry

--

Jessica Berry
Accounting Support
Marketing Support

(509) 649-2211 phone
(509) 649-5271 direct
(509) 649-3300 fax

P.O. Box 171
103 S. 2nd St.
Roslyn, WA 98941
www.inlandnetworks.com

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Letter L-23

SEPAResponsibleOfficial



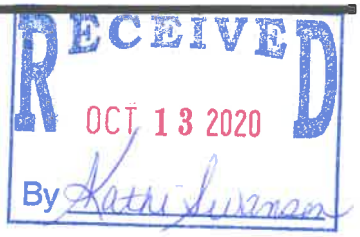
From: Brandy Bogart <brandybogart5@gmail.com>
Sent: Tuesday, October 27, 2020 11:10 AM
To: SEPAResponsibleOfficial
Subject: Bullfrog flats

"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Thank you
Brandy Bogart

Letter L-24

SEPAResponsibleOfficial



From: Corinna Bolender <corinnabolender@hotmail.com>
Sent: Tuesday, October 13, 2020 6:07 PM
To: SEPAResponsibleOfficial
Subject: Community Center

The City of Cle Elum should immediately demand, in good legal form, that Suncadia immediately transfer 12 acres and $5.8 million for a community center, as specified in the 2002 Development Agreement for Bullfrog Flats.

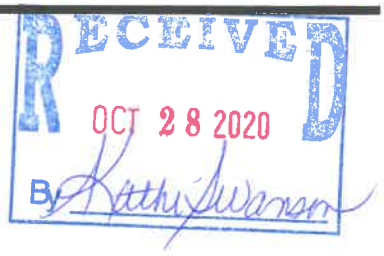
All discussions regarding Bullfrog Flats should cease until the City of Cle Elum has received what was promised for a community center. 1

Regards, Corinna
425-943-0000

Letter L-25

SEPAResponsibleOfficial

From: Lisa Bronkema <bronkemal@gmail.com>
Sent: Wednesday, October 28, 2020 7:53 AM
To: SEPAResponsibleOfficial
Subject: City of Cle Elum Bullfrog Agreement



To whom it may concern:

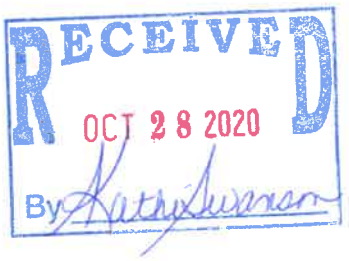
The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Thank you for fulfilling your legal obligations to this community,
Lisa Bronkema

Letter L-26

SEPAResponsibleOfficial

From: Kathi Butorac <kbutorac1_elma@hotmail.com>
Sent: Wednesday, October 28, 2020 9:47 AM
To: SEPAResponsibleOfficial
Subject: Upper Kittitas County community center



Sent from Mail for Windows 10

Wow, what an opportunity to provide our communities with a community center. It was with great foresight that this land and money were set aside to contribute more than homes and land development to the area. It looks like an incentive for local acceptance. The City of Cle Elum must do the right thing for Cle Elum and Upper Kittitas County by putting this land and funds agreement in motion for the benefit of those who have accepted Suncadia into the neighborhood. 1

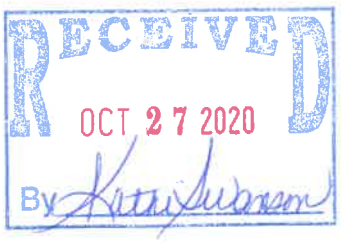
"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum."

Thank you for putting the citizens first.

Sincerely, Kathi Butorac

SEPAResponsibleOfficial

From: Mike Butorac <mbutorac_cabin@hotmail.com>
Sent: Tuesday, October 27, 2020 12:44 PM
To: SEPAResponsibleOfficial
Subject: Cle Elum Contractual Obligation



Sent from Mail for Windows 10
To Whom This May Concern;

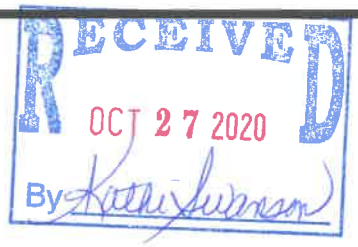
I have been a permanent citizen of the City of Cle Elum since 2014. My wife and I live in the same residence that my parents purchased in 1940.
It has been disappointing to see the land developers come into the city that we cherish. Change is inevitable, but the City of Cle Elum still has the responsibility to effectively manage the changes to our community. 1

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flags Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. 2

Thank you for this consideration,
Mike Butorac

SEPAResponsibleOfficial

From: Amy Casto <fidelityappraisal777@gmail.com>
Sent: Tuesday, October 27, 2020 8:57 PM
To: SEPAResponsibleOfficial
Subject: Community center



The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled 1

SEPAResponsibleOfficial

From: Catherine Cook <cgcook601@gmail.com>
Sent: Monday, November 02, 2020 10:40 AM
To: SEPAResponsibleOfficial
Subject: 47* N / Bullfrog Flats

RECEIVED
NOV - 2 2020
By Kathy Lussmon

To SEPA Responsible Official

I am a resident of Roslyn and I'm writing to express my concern about the impacts of the massive development planned at Bullfrog Flats. The project, which will double the size of Cle Elum, will also impact Roslyn and, in fact, is as close to downtown Roslyn as it is to downtown Cle Elum. 1

The developer, Sun Countries, is relying on a previously approved development proposal that differs significantly from their current one. The current Sun Countries project includes, in addition to a modular home community, a 600-space RV resort. This is substantially different from the previously approved conventional subdivision and should be considered separately from the modular home portion of the Sun Countries proposal. The RV resort is not a housing development—it is a private business. It will have impacts of a different nature than a housing development. I ask that the RV resort portion of this proposal be subject to a new and separate SEPA approval. 2

In proposing a project that will double the size of Cle Elum, the developer is subjecting our community to a wide array of impacts. We will need: more schools, more police, better roads, more firefighters, an expansion of our medical facilities, a larger garbage transfer station, and an assessment of our waste water treatment capacity. The developer does not address any of these issues—I assume that will fall on us, the taxpayers. I ask that the development be delayed until these problems have been studied and mitigated. 3

Our towns are subject to wildfire. The study linked here rates our area at HIGHER risk than the Camp Fire in Paradise, CA that took 85 lives and destroyed 19,000 buildings. https://www.azcentral.com/in-depth/news/local/arizona-wildfires/2019/07/22/wildfire-risks-more-than-500-spots-have-greater-hazard-than-paradise/1434502001/ And in addition to local residents, in the summertime we also have large concentrations of people in the campgrounds up the road from us. If there's a fire, how can we all leave? The area at Bullfrog Flats will be blocked by traffic from a development equal in size to Cle Elum itself. This is unacceptable. If the development proceeds, there must be accommodation made for new access and exit routes. 4

Please consider these objections and act accordingly.

Thank you,

Catherine Cook
PO Box 601
Roslyn, WA 98941

Letter L-30

SEPARes ponsibleOfficial



From: Crawford, Adam <Adam.Crawford@pse.com>
Sent: Monday, November 02, 2020 4:10 PM
To: SEPAResponsibleOfficial
Subject: Cle Elum

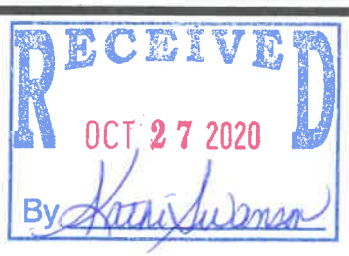
The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. -Adam Crawford 1

Sent from my iPhone

Letter L-31

SEPAResponsibleOfficial

From: Michael Day <daymichael_@hotmail.com>
Sent: Tuesday, October 27, 2020 10:40 AM
To: SEPAResponsibleOfficial
Subject: Community Center



To whom it may concern:

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

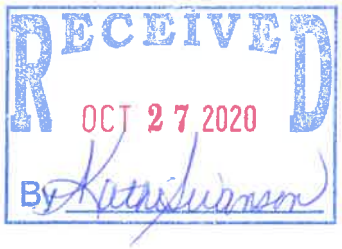
This is extremely important to the community and the children. Please take action and hold Suncadia accountable.

Michael Day
509-899-7478

Letter L-32

SEPAResponsibleOfficial

From: Maya Deknikker <mayadeknikker@gmail.com>
Sent: Tuesday, October 27, 2020 6:52 PM
To: SEPAResponsibleOfficial
Subject: Community center



Hi,

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled.

We live in Kittitas county just outside of the Cle Elum city limits. My husband and I are the parents of two young children who both are enrolled in Cle Elum Roslyn elementary. My husband works in the community by restoring creeks and rivers providing fish habitat and I work for the school district as a para educator. We all love living in upper county but we are extremely worried that there is a lot left to be desired for the youth of our community. A community center would provide so many opportunities to keep our kids out of trouble and engaged in positive activities as well as bring jobs to upper county. Please please please don't overlook this opportunity for our youth. 1

Thank you,
Maya DeKnikker

Letter L-33

SEPAResponsibleOfficial



From: doernea@aol.com
Sent: Wednesday, October 14, 2020 10:20 AM
To: SEPAResponsibleOfficial; doernea@aol.com
Subject: Fwd: Community Center for Upper Kittitas County

We have been part of this community over 10 years. We have enjoyed several of the Community Enhancement programs and concerts that Suncadia sponsored. Suncadia had obligated themselves to provide the community access to a swimming facility and many other benefits for our city and community to mitigate their development. Who in the city is pushing Suncadia to see that these benefits flow down to our citizens? How long do we wait?

I support this statement, and demand that the city push hard on getting Suncadia to follow through with it's contractual obligation. 1

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled.

Ed Doern

Cle Elum

SEPAResponsibleOfficial

From: Donoris <donoris@aol.com>
Sent: Friday, October 16, 2020 2:00 PM
To: SEPAResponsibleOfficial
Subject: Community Center



Hello!

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Thank You

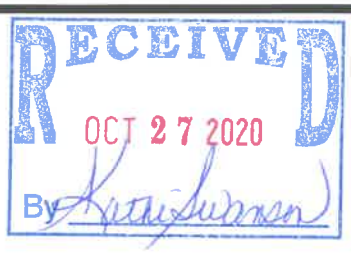
Larry Donovan
943 Trailside Drive
Cle Elum, WA

Letter L-35

SEPAResponsibleOfficial

From: Carlene Dunham <carlenedunham@gmail.com>

Sent: Tuesday, October 27, 2020 7:49 PM
To: SEPAResponsibleOfficial
Subject: Community Center / Bullfrog Flats



To Whom It May Concern,

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Kind regards,

Carlene Dunham
Cle Elum, WA

SEPAResponsibleOfficial

From: Ashley Dunn <dunnaa21@gmail.com>
Sent: Friday, October 09, 2020 10:21 AM
To: SEPAResponsibleOfficial
Subject: Community Center

RECEIVED
OCT 09 2020
By

Hello,
I read the article in the newspaper about Suncadia's obligation to provide 12 acres and $5.8 million dollars for a community center off Bullfrog Road.The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. 1

I'm disappointed that this has not been a priority since it was one of the conditions of Suncadia being in our community. Suncadia benefits greatly from having their business in our community and it is only fair that they meet the obligations they agreed to.

Sincerely,
Ashley Dunn
509-304-4936
Roslyn resident

Letter L-37

RECEIVED
OCT 27 2020
By

SEPAResponsibleOfficial

From: Freida Ellison <ellisonf@easton.wednet.edu>
Sent: Tuesday, October 27, 2020 8:21 PM
To: SEPAResponsibleOfficial
Subject: Suncadia Obligations under the 2002 Bullfrog Flats Development Agreement

To the SEPA Responsible Official at the City of Cle Elum

I am very curious why the City has not demanded that Suncadia meet its obligations under the 2002 Bullfrog Flats Development Agreement. Since it has only recently come to light within the citizens of the the Upper County, I am now wondering why it has not been addressed for nearly 20 years. 12 acres of land and $5.8 million (in 2002) is nothing to sneeze at so I am really befuddled how the ball got dropped on this.

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million plus interest earned since the date of the agreement, expressly for a community center, to the City of Cle Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

This community desperately needs a community center for our youth; a place for them to practice sports, swim, exercise, gain interpersonal skills, and just be with other youth in a safe environment. Please don't let this very real opportunity go by the wayside. Demand Suncadia fulfill its obligations before they sell to another developer.

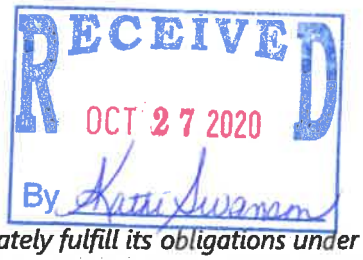
Thanks,

--
Freida Ellison
702 S A Street
Roslyn, WA 98941
(425)829-5340
freidamarie@msn.com

Letter L-38

SEPAResponsibleOfficial

From: Theresa Ellison <telovedesign@gmail.com>
Sent: Tuesday, October 27, 2020 9:38 AM
To: SEPAResponsibleOfficial
Subject: Community Center



"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled."

1

I am very passionate about this and how much it is needed in our Community, please take action to get us what our youth deserve. This Community Center is so important to our area and youth and something that has been needed for many years!

Thank you,

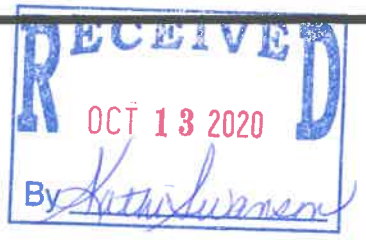
Theresa Ellison
South Cle Elum resident
Cle Elum Employee and lifetime resident

Letter L-39

SEPAResponsibleOfficial

From: Jon Elward <elwardjon@gmail.com>

Sent: Tuesday, October 13, 2020 8:06 PM
To: SEPAResponsibleOfficial
Subject: 2002 Bullfrog Flats Development Agreement



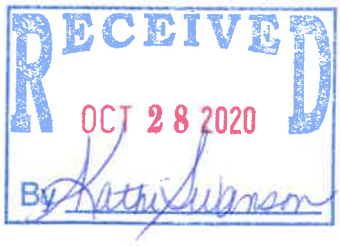
The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Jon W. Elward
3091 Summit View Road
Cle Elum, WA 98922
Personal Cell Phone (primary – try this one first): **+1.404.281.5552**
Business Cell Phone (backup after trying personal cell): **+1.262.865.0435**
NEW Personal Email: elwardjon@gmail.com

Letter L-40

SEPAResponsibleOfficial

From: Ann Fuller <annmfuller@live.com>
Sent: Wednesday, October 28, 2020 8:56 AM
To: SEPAResponsibleOfficial
Subject: Suncadia Obligations



Dear SEPA Responsible Official:

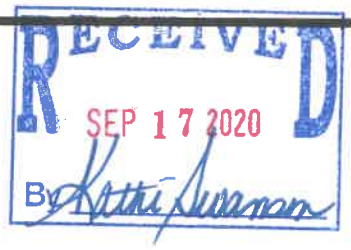
"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." Not fulfilling this obligation is a heinous and irresponsible disregard to the obligation that was set forth in the 2002 Bullfrog Flats Development Agreement. 1

Regards,

Ann Fuller

Letter L-41

SEPAResponsibleOfficial



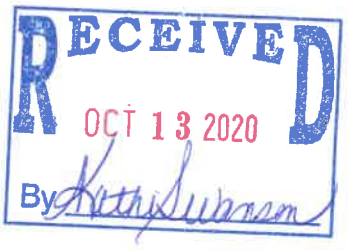
From: Glenna Green <gggreenbns@icloud.com>
Sent: Thursday, September 17, 2020 12:54 PM
To: SEPAResponsibleOfficial
Subject: Comment

This area cannot support a development of this size. Our infrastructure can't handle what we already have and our tax base will increase pushing out people's who cannot afford the increase. I object. 1
Sent from my iPhone

Letter L-42

SEPAResponsibleOfficial

From: Susan Grindle <skgrindle@hopesource.us>
Sent: Tuesday, October 13, 2020 10:46 AM
To: SEPAResponsibleOfficial
Cc: Claire Nicholls
Subject: 2002 Bullfrog Flats Development Agreement

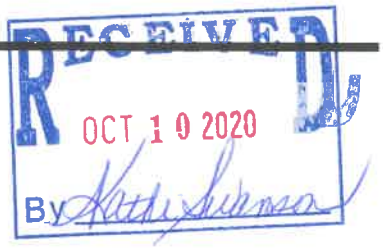


City of Cle Elum
HopeSource is joining the citizens of Cle Elum in requesting that the City of Cle Elum require Suncadia to perform its obligations under the 2002 Development Agreement, and convey 12 acres of land and provide the funds necessary to construct a community center on that site. As the 47 North by Sun Communities and the SEIS process are in the comment period this would be the ideal time to make a strong argument for the need of the citizens of Cle Elum to have a community center available to their children, seniors, families and individuals. When a community comes together to talk, work, and play the community is stronger and healthier. 1

We urge you to work diligently and urgently to effect this transfer of land and funds to the City of Cle Elum from Suncadia for this important community resource.

Letter L-43

SEPAResponsibleOfficial



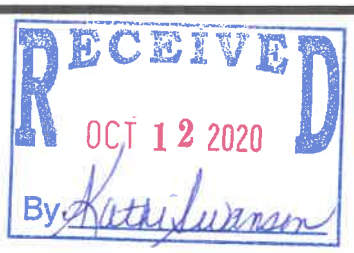
From: Patricia Griswold <griswoldtrish@icloud.com>
Sent: Saturday, October 10, 2020 5:28 AM
To: SEPAResponsibleOfficial
Subject: 47 north

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Sent from my iPhone

Letter L-44

SEPAResponsibleOfficial



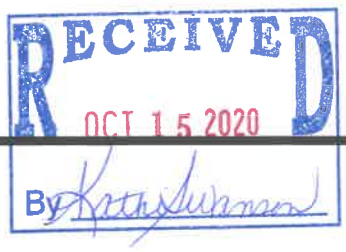
From: Marilyn Gruber <mjg922@comcast.net>
Sent: Monday, October 12, 2020 2:07 PM
To: SEPAResponsibleOfficial
Subject: community center

Elected officials of Cle Elum--

The city of Cle Elum MUST demand that Suncadia immediately fulfill its contractual obligation to cede to Cle Elum the property and building funds to develop a community center. The Bullfrog Flats property agreement was included in a 2002 contract with the city but was never acted upon. The city must take action on this important matter immediately and in accordance with all legal requirements. Cle Elum city officials must be responsible to the voters of Upper County. I am a registered voter. 1

Marilyn Gruber

Letter L-45



SEPAResponsibleOfficial

From: Judy Hallisey <hydrojude@gmail.com>
Sent: Wednesday, October 14, 2020 4:50 PM
To: SEPAResponsibleOfficial
Cc: John Glondo; Ken Ratliff; beth@cityofcleelum; Steve Harper; Ruston Weaver; mayor@ci.roslyn.wa.us; council1@ci.roslyn.wa.us; council3@ci.roslyn.wa.us; council2 @ci.roslyn.wa.us; council4@ci.roslyn.wa.us; council5@ci.roslyn.wa.us; council6 @ci.roslyn.wa.us; council7@ci.roslyn.wa.us; Matthew Lundh; Jay McGowan
Subject: SEPA Bullfrog Flats Development and Obligations to Community Center

To all concerned: I ask you to please direct Suncadia and its derivatives to honor their commitments to our community by conveying 12 acres of land and funding a community center per the 2002 Development Agreement. This is timely as the Bullfrog Flats Development proceeds. Any SEPA and associated decisions relevant to Bullfrog Flats Development must include the land conveyance and funds made available for the community center. Our communities have been begging for community center facilities and amenities for years, and they have waited long enough. 1

I realize such land and community center impose future costs to our communities due to maintenance and sustainability. Perhaps in lieu of annual property value tax increases, please look at imposing a property sales tax imposed on Roslyn and Cle Elum and their surrounding areas as properties are sold and exchanged, similar to that of Suncadia residences. 2

Per the Bullfrog Flats Development, I request a new wildlife winter range analysis be made. Since the original proposal, Suncadia and surrounding areas have been developed, pushing wildlife to use the area around Bullfrog more heavily. The Bullfrog Flats Development will diminish wildlife habitat even more, leading to increased wildlife road collisions and resident complaints. How these impacts will be mitigated needs disclosure. 3

Judy Hallisey
380 Landers Lane
Cle Elum, WA 98922
hydrojude@gmail.com

RECEIVED
OCT 15 2020
By Kathi Swanson

Kathi Swanson

From: Beth Willams
Sent: Thursday, October 15, 2020 2:27 PM
To: Kathi Swanson
Subject: Re: SEPA Bullfrog Flats Development and Obligations to Community Center

---

From: Judy Hallisey <hydrojude@gmail.com>
Sent: Wednesday, October 14, 2020 5:07:31 PM
To: beth@cityofcleelum.com <beth@cityofcleelum.com>
Subject: Fwd: SEPA Bullfrog Flats Development and Obligations to Community Center

sorry for the typo in your address on the first send.
Judy Hallisey
hydrojude@gmail.com

Begin forwarded message:

From: Judy Hallisey <hydrojude@gmail.com>
Subject: SEPA Bullfrog Flats Development and Obligations to Community Center
Date: October 14, 2020 at 4:49:50 PM PDT
To: SEPAResponsibleOfficial@cityofcleelum.com
Cc: jglondo@cityofcleelum.com, kenr@cityofcleelum.com, beth@cityofcleelum, steveharper@cityofcleelum.com, ruston@cityofcleelum.com, mayor@ci.roslyn.wa.us, council1@ci.roslyn.wa.us, council3@ci.roslyn.wa.us, council2@ci.roslyn.wa.us, council4@ci.roslyn.wa.us, council5@ci.roslyn.wa.us, council6@ci.roslyn.wa.us, council7@ci.roslyn.wa.us, matthew@cityofcleelum.com, mayormcgowan@cityofcleelum.com

To all concerned: I ask you to please direct Suncadia and its derivatives to honor their commitments to our community by conveying 12 acres of land and funding a community center per the 2002 Development Agreement. This is timely as the Bullfrog Flats Development proceeds. Any SEPA and associated decisions relevant to Bullfrog Flats Development must include the land conveyance and funds made available for the community center. Our communities have been begging for community center facilities and amenities for years, and they have waited long enough.

I realize such land and community center impose future costs to our communities due to maintenance and sustainability. Perhaps in lieu of annual property value tax increases, please look at imposing a property sales tax imposed on Roslyn and Cle Elum and their surrounding areas as properties are sold and exchanged, similar to that of Suncadia residences.

H-02

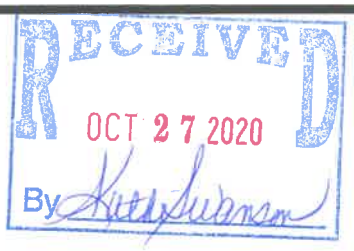
Per the Bullfrog Flats Development, I request a new wildlife winter range analysis be made. Since the original proposal, Suncadia and surrounding areas have been developed, pushing wildlife to use the area around Bullfrog more heavily. The Bullfrog Flats Development will diminish wildlife habitat even more, leading to increased wildlife road collisions and resident complaints. How these impacts will be mitigated needs disclosure.

Judy Hallisey
380 Landers Lane
Cle Elum, WA 98922
hydrojude@gmail.com

H-02

Letter L-46

SEPAResponsibleOfficial



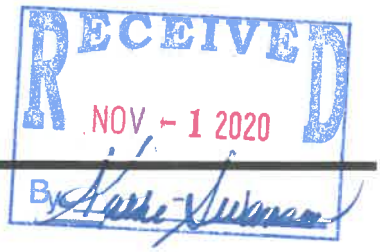
From: Lyndsey Halte <lyndseyhalte@gmail.com>
Sent: Tuesday, October 27, 2020 1:28 PM
To: SEPAResponsibleOfficial
Subject: Bullfrog land agreement

"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Lyndsey Halte
lyndseyhalte@gmail.com
509-674-8203

"In a world where you can be anything, BE KIND" :)

Letter L-47



SEPAResponsibleOfficial

From: Lisa Hegg <tlhegg@comcast.net>
Sent: Sunday, November 01, 2020 7:29 PM
To: SEPAResponsibleOfficial
Subject: Public Comment to the Bullfrog Supplemental Environmental Impact Statement

November 1, 2020

To: Cle Elum City Council
Re: Public Comment to the Bullfrog Supplemental Environmental Impact Statement

To Whom It May Concern,

We wanted to voice our thoughts and numerous concerns in regards to the Bullfrog SEIS and Technical Reports. It is our belief that the proposed amendments to the 2002 Development Agreement would be extremely detrimental to our Community for many reasons, including but not limited to the following areas: Transportation, Local Economy, and Public Services.

The main traffic congestion is in the City of Cle Elum City limits and Bullfrog Road. Who will pay to make the necessary improvements? How will the congestion be alleviated in this area? These issues need to be addressed more thoroughly. The project should also be required to extend an arterial to Douglas Munro Blvd, to provide an alternative route from the project to the City Center. This extension to the Douglas Munro Blvd would also allow for an additional emergency evacuation route, as well as emergency access. Currently, Bullfrog Road and Highway 93 are the only options of escape. 1

Most importantly, the proposed Developer, Sun Communities has not offered to pay for ANY of the improvements to our infrastructure. The proposed project would add 2,809 people, increasing the population by 84%, and essentially doubling the size of Cle Elum. The City of Cle Elum would need to: double their police force, hire an additional 3 full time firefighters, 6 new EMTs, and 7 new paramedics. Our Cle Elum Roslyn School District would need to hire 23 new teachers, buy 6-7 new school buses. Our School District is already at capacity, and would need to add more classrooms. Unfortunately, the Developer is not proposing to fund any school expansion. Costs for other public building expansions would also need to be addressed. How will these costs be funded? Not by Sun Communities. They will only be required to pay property taxes on undeveloped land. Therefore, taxes will need to be raised to pay for these improvements. This is unacceptable. 2

The proposal does not address affordable housing, or the Community Center that Suncadia has promised us, as stated in the 2002 Development Agreement. Once Again, this is unacceptable. 3

Unfortunately, we have researched Sun Communities, Inc. We are appalled at their greedy corporate practices of owning the lots of the manufactured homes (thereby only required to pay property taxes on undeveloped land), and then increasing the rents on said lots at a rate of 5% per year. In a short matter of time, these mobile homes become run down. Who pays to remove these dilapidated mobile homes? Surely not Sun Communities. 4

The proposals by Sun Communities would negatively impact our beautiful Upper County. We cannot allow this greedy Corporation to destroy our Town. The original agreement was entered into back in 2002, with Suncadia. Unfortunately, So much has changed since this time. Our small town is already experiencing growing pains due to the high volume of Seasonal Tourists and Recreational Users frequenting our area. We are imploring you to listen to our concerns, and not allow this project to continue. 5

Sincerely,

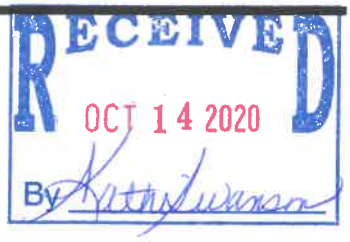
Lisa and Tim Hegg

Letter L-48

SEPAResponsibleOfficial

From: John Hein <johnhein@shoemakermfg.com>

Sent: Wednesday, October 14, 2020 6:50 AM
To: SEPAResponsibleOfficial
Subject: IMMEDIATE ACTION ON DEVELOPMENT AGREEMENT



The City of Cle Elum should immediately demand, in good legal form, that Suncadia immediately transfer 12 acres and $5.8 million for a community center, as specified in the 2002 Development Agreement for Bullfrog Flats.

All discussions regarding Bullfrog Flats should cease until the City of Cle Elum has received what was promised for a community center. This has drug on far too long!

1

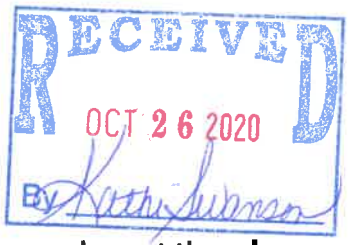
SHOEMAKER MANUFACTURING

John Hein | President
johnhein@shoemakermfg.com

Shoemaker Manufacturing Company
Office: 509.674.4414 x147
618 E 1st Street. Cle Elum, WA 98922
www.shoemakermfg.com

Read Our Vendor and Visitor Safety Protocols

Letter L-49



Thank you City council and Mayor McGowan for letting me speak tonight

My name is john Hein and I am a lifelong resident and business owner in Cle Elum and spent the last 3 years working with community members, including the mayor and City employees trying to get Suncadia to fulfill their 2002 development agreement obligations in a nice and respectful way, unfortunately we have been unsuccessful

I am commenting tonight about the 2002 development agreement between the City of Cle Elum and what is now "New Suncadia" 1

I would like to see the council demand an agenda item be added at the next council meeting to vote on freezing/stopping any projects with Suncadia, including the Sun Communities 47 North Project until the transfer of the land and all amenities tied to condition 38 of the development agreement are met.

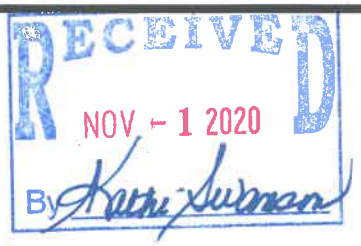
I respect and appreciate what Suncadia has brought to our community, but the city needs to act with a sense of urgency and leverage. The city also needs to make sure all conditions of the development agreement are met. 2

Thank you for your time.

Letter L-50

SEPAResponsibleOfficial

From: Alex Hernandez <a.c.dez84@gmail.com>
Sent: Sunday, November 01, 2020 4:22 PM
To: SEPAResponsibleOfficial
Subject: 47 North Project



To whom it may concern,

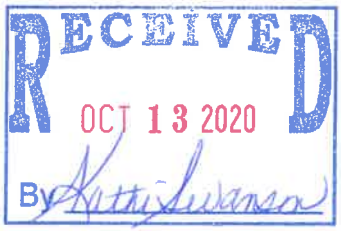
I have to start by stating that I am 100% against this project. Allowing the area of Bull Frog Flats to be desecrated with another resort community would be a disgrace. Many of us upper county residents enjoy that area just as it is. We enjoy the beauty of the natural surroundings and how they butt right up to town. This is a big reason why some of us choose to live here. Suncadia is already here... they've built their monstrosity. We don't need another one. That said, I am not blind to the fact that the residents of Cle Elum, Roslyn, Ronald and Easton could benefit from minimal development in that area. 1

I'm sure the City of Cle Elum would find vast, community wide support if the development was centered on services the community actually needs. Additional commerce(locally owned, and now not 17 years from now maybe), expanding the schools, low cost housing that people could own outright... are all things that could be accomplished with minimal development and would service the community directly. Furthermore, the added impact of 707 "residential units"(aka vacation homes) and 627 RV sites would have on the limited shops that currently exist would be absolutely devastating. The only grocery store in town is already at critical mass on any normal summer weekend without this added element. I can't stress it enough that this is **NOT** the kind of development the community needs. To insist that it is, is out of touch to say the least. Please do not let this plan progress. 2 3

-Al Hernandez
Roslyn resident

SEPAResponsibleOfficial

From: annemarie <annemariefhill@gmail.com>
Sent: Tuesday, October 13, 2020 10:01 PM
To: SEPAResponsibleOfficial
Subject: City of Cle Elum and Suncadia



The City of Cle Elum should immediately demand, in good legal form, that Suncadia immediately transfer 12 acres and $5.8 million for a community center, as specified in the 2002 Development Agreement for Bullfrog Flats. 1

All discussions regarding Bullfrog Flats should cease until the City of Cle Elum has received what was promised for a community center.

Thank you,

Annemarie Hill
Sent from my iPhone

SEPAResponsibleOfficial

From: ironpawsmike@gmail.com
Sent: Sunday, October 11, 2020 8:53 AM
To: SEPAResponsibleOfficial
Subject: FW: Suncidia land obligations

RECEIVED
OCT 11 2020
By Kathy Swanson

Hello

I'd like to voice my support for having Sucdadia live up to their word and pledge they made to the community to help Cle Elum obtain an new community center on land donated by them - - as part of their list of promises to develop their project. 1

Please make them live upto their promise - - before they sale their operation.

Mike Hoban
Cle Elum.

SEPAResponsibleOfficial

From: Nancy Holmes <rooskih@gmail.com>
Sent: Wednesday, October 21, 2020 11:35 AM
To: SEPAResponsibleOfficial
Subject: 2002 Development Agreement

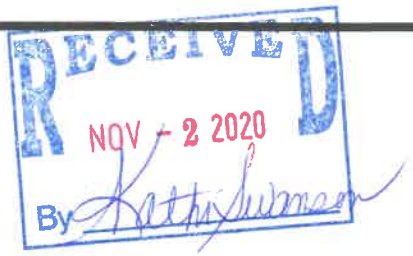


The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. 1

Sent from my iPhone

SEPAResponsibleOfficial

From: Douglas Hutchinson <deh1946@gmail.com>
Sent: Monday, November 02, 2020 3:47 PM
To: SEPAResponsibleOfficial
Subject: Comment on SEIS 47 N



My name is Douglas Hutchinson. I have lived as a full-time resident of Cle Elum for the last 5 years.

One of the attractions that drew me to move to Cle Elum was the Washington State Horse Park (WSHP). My avocation is horseback riding, specifically trail riding, and I ride 50-70 days a season at the WSHP as well as additional days at other locations along the east slope of the Cascades and elsewhere in Central Washington. I ride so much at the WSHP because it is less than a 15 minute drive from my house and I prefer riding to spend free time horseback riding rather than driving.

During my first ride at WSHP I realized that aside from a nice trail layout, the woods abounded in wildlife. My daily trail riding logs have indicated that elk are seen in up to 40% of rides as a season average. Mule deer, turkeys and coyotes are also very commonly seen. A myriad of birds are present as well. It's a great place to ride, see animals and still be close to home. 1

Naturally I was distressed when I learned of and about the 47 North project. I understand there is a proposed trail associated with the project but riding around subdivisions and through an RV park doesn't compare with the current experience. Like many residents of Cle Elum I'm concerned with the impact of such a large housing project on the quality of life here. Crowded streets, schools and grocery stores are but a few of the issues. I'll leave the discussion of these problems to others. I'd like to concentrate on problems I see with the environment, plants, and most specifically the wildlife. 2

On its face, displacement of common wildlife is accepted by the developers as an unfortunate but somehow justifiable cost of urbanization. A look at the maps provided in the"Wetlands, Plants, and Animals and Fisheries Assessment"(WPAFA) section in the SEIS, tells me that the principal habitat utilized by elk and other animals is nearly entirely occupied by the RV Park portion of the project. Based on my many rides, this is where the elk calve in late May and early June and where those that stay through the summer seek relief from the heat during the day. It's true that elk can be seen anywhere in the park but based on my 250 rides over the last 4 years, their principal hideouts, cover and food supply will be destroyed in construction of the RV Park. It appears that biologists engaged to prepare the WPAFA spent but 1 day on the ground in October 2019. They understandably relied heavily on the previous work product for the first EIS. It's difficult to get a real sense for the magnitude of the impact on the animals though if one doesn't have more than a cursory understanding of where the animals spend time. One day on the ground isn't enough time. 3

Obviously many of the elk currently residing in WSHP spend time on Suncadia as well. When the elk are in their biggest herds in the WSHP, there are 25-30 individuals and they undoubtedly will be spending more time on Suncadia property including golf courses and residential grounds if the RV construction is constructed where it is currently sited. 4

Species of concern are given special consideration in gaining approval for construction projects like 47N. The Northern Spotted Owl is a specie considered by the WPAFA section of the SEIS. It is listed as "Endangered"in Washington state and "threatened" by USFWS nationally. The WPAFA indicates that preferred habitat for the Northern Spotted Owl is where "Douglas Fir dominates the stands and canopy closure is dense enough to be conducive to owl use" (pg 24 of the e-document) but then goes on to say "there is no such cover within or near 5

the 47N site." When studying the forest type map on pg 69 of the e-document, I was surprised to find a habitat map showing the designation"Fc-f". "Fc-f" is the symbol for Forested coniferous: Douglas-fir dominant, closed canopy. This forest designation is within the project boundary of 47 N and is "preferred habitat" for the Northern Spotted Owl. It lies south of the RV Park. Shouldn't the developers at least clarify why this preferred habitat for the Northern Spotted Owl that is within project boundaries isn't a concern under the Endangered Species Act? 5 cont'd

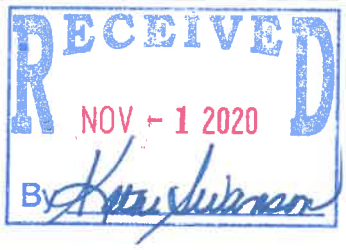
Thanks for your consideration.

Douglas Hutchinson
deh1946@gmail.com
802 825 5003

Letter L-55

SEPAResponsibleOfficial

From: Victoria <victoria.jarvis@gmail.com>
Sent: Sunday, November 01, 2020 3:59 PM
To: SEPAResponsibleOfficial
Subject: Bullfrog development comment



I wanted to submit a comment on the proposed Bullfrog Flats Development. As a resident and homeowner in Roslyn and someone who works in Cle Elum, I am shocked to hear that this kind of project would be approved that will only worsen pre existing problems. Traffic here is already terrible (labor day weekend traffic was backed up all the way from the on ramp to the bullfrog roundabout), we have only one grocery store where the lines are always extensive, parking is difficult, low income residences can not find housing, all of the people and tourism here generate a scary realities of bottlenecked roads if we all needed to get out during a fire....all of these issues will only worsen by adding this development. Our cities need to take some responsibilities for the pressure this will put on local infrastructure that is already overwhelmed with the people we currently have here. I think I speak for many when I say it would be nice to consider the people who **already** live and work here and the things we need before adding hundreds more homes of people who will add enormously to our existing problems. How about a development we need...like a grocery store to offset the crowds at Safeway and promote some reasonable prices as well as generate some jobs (and no, a *possible* commercial development within this one in 17 years is not good enough). Or even how about that a lot of us live here **because** of the minimal development. Maybe considering the underrated benefits of how so many of us love driving that road because it is **not** developed and we value that and it's inherent beauty. 1

For the record my comment is wholly against this development. File it as such and change my last comment on this project to reflect that. Not sure who got to decide where residents stand on this but I was incorrectly listed as "neither for nor against."

Thanks for your consideration,
Victoria Jarvis

Letter L-56

SEPAResponsibleOfficial



From: djayne133@comcast.net
Sent: Tuesday, October 20, 2020 12:36 PM
To: SEPAResponsibleOfficial
Subject: Community Center

Dear sir,

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill it's obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. 1

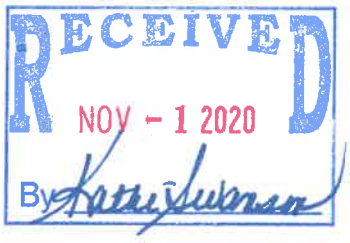
Thank you.

Rich and Barbara Jayne
Cle Elum

Letter L-57

SEPAResponsibleOfficial

From: Patricia <patricia@winningfoundations.com>
Sent: Sunday, November 01, 2020 7:57 AM
To: SEPAResponsibleOfficial
Subject: Suncadia Agreement Regarding Bullfrog Flats



Good Morning,

I am appalled at the lack of responsible handling of the agreement between the City of Cle Elum and Suncadia regarding the Bullfrog Flats Development of 2002. At this time we are asking the City of Cle Elum to immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Sincerely,

Patricia Miller-Jerke
Terrance Jerke

Letter L-58

SEPAResponsibleOfficial

From: Doug Johnson <dajohnson512@gmail.com>
Sent: Friday, October 30, 2020 5:54 PM
To: SEPAResponsibleOfficial; Doug Johnson
Subject: Bullfrog Flats Development Concerns

RECEIVED
OCT 30 2020
By Kathy Lubman

SEPA-Responsible Official:

I have several concerns regarding the proposed development in the Bullfrog Flats area. I have lived in the area for over 45 years and seen the effects of development all around Northern Kittitas County.

- The traffic in this area has increased to levels that are not just inconvenient, but at times dangerous. Our present infrastructure is not adequate for current loads, and the addition of thousands of additional residents will make this situation much worse. There must be major built-in mitigation requirements for roads, water, power, and sewer infrastructure. 1
- Wildlife has already been pushed out of their historical foraging grounds and we now have a herd of elk wandering right through Roslyn regularly. It is just a matter of time before there is a serious vehicle accident or before a person gets trampled by an animal whose weight runs into the many hundreds of pounds. Another huge development in the area will of course exacerbate this issue. 2
- The location of this project will have additional deleterious effects on the ecology of the Cle Elum river and downstream into the Yakima River. People inevitably discharge waste of various kinds into watersheds, including oil and gas. 3
- There will be increased pressure on local schools, fire protection, and law enforcement. 4
- There is an issue with the ownership structure of this project. Manufactured homes do not promote good economics and care for the land, especially when the property itself is not owned by the residents. 5
- Another huge development here in this immediate area will degrade the quality of life in this little mountain community. Many local residents and visitors hike, mountain bike, explore, forage for mushrooms, and engage in other outdoor activities daily in our wild lands. Growth in our communities should be focussed on infilling traditionally residential areas, not the wild, forested ones. 6

Thank you,

Doug Johnson
317 South third Street Alley
Roslyn, WA 98941

SEPAResponsibleOfficial

From: Lucy Temple
Sent: Monday, November 02, 2020 8:44 AM
To: SEPAResponsibleOfficial
Cc: Kathi Swanson
Subject: FW: Bullfrog Flats development

Project comment below.

From: Doug Johnson [mailto:dajohnson512@gmail.com]
Sent: Friday, October 30, 2020 5:33 PM
To: Lucy Temple
Cc: dajohnson512@gmail.con; Susan Johnson
Subject: Bullfrog Flats development

Lucy,

I have several concerns regarding the proposed development in the Bullfrog Flats area. I have lived in the area for over 45 years and seen the effects of development all around Northern Kittitas County.

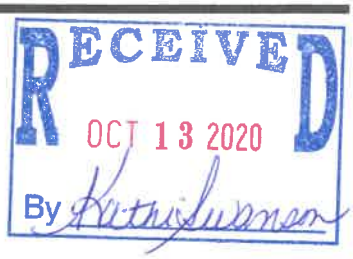
- The traffic in this area has increased to levels that are not just inconvenient, but at times dangerous. Our present infrastructure is not adequate for current loads, and the addition of thousands of additional residents will make this situation much worse. There must be major built-in mitigation requirements for roads, water, power, and sewer infrastructure.
- Wildlife has already been pushed out of their historical foraging grounds and we now have a herd of elk wandering right through Roslyn regularly. It is just a matter of time before there is a serious vehicle accident or before a person gets trampled by an animal whose weight runs into the many hundreds of pounds. Another huge development in the area will of course exacerbate this issue.
- The location of this project will have additional deleterious effects on the ecology of the Cle Elum river and downstream into the Yakima River. People inevitably discharge waste of various kinds into watersheds, including oil and gas.
- There will be increased pressure on local schools, fire protection, and law enforcement.
- There is an issue with the ownership structure of this project. Manufactured homes do not promote good economics and care for the land, especially when the property itself is not owned by the residents.
- Another huge development here in this immediate area will degrade the quality of life in this little mountain community. Many local residents and visitors hike, mountain bike, explore, forage for mushrooms, and engage in other outdoor activities daily in our wild lands. Growth in our communities should be focussed on infilling traditionally residential areas, not the wild, forested ones.

Thank you,
Doug Johnson
317 South third Street Alley
Roslyn, WA 98941

Letter L-59

SEPAResponsibleOfficial

From: Susan Johnson <susanjohnsonwa@gmail.com>
Sent: Tuesday, October 13, 2020 11:33 AM
To: SEPAResponsibleOfficial
Subject: Comments on Bullfrog Flats Development Agreement



Dear City of Cle Elum Official:

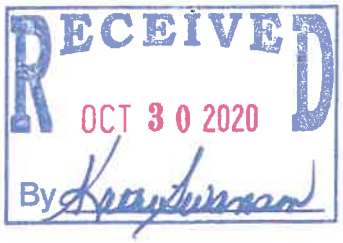
I ask that the City of Cle Elum immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats need to cease until this obligation is fulfilled. 1

With respect,
Susan Johnson
317 South Third Street Alley
Roslyn, WA 98941

Letter L-60

SEPAResponsibleOfficial

From: Susan Johnson <susanjohnsonwa@gmail.com>
Sent: Friday, October 30, 2020 4:49 PM
To: SEPAResponsibleOfficial
Subject: Re: Comments on Bullfrog Flats



To SEPA Responsible Official,

I write to express my concerns for the proposed Bullfrog Flats Project. Following are my comments on the Draft SEIS. Please enter them into the record:

- I am concerned about loss of wildlife habitat, a critical issue in our area because of the encroachment of new development into wildlife habitat. Residents in Roslyn and in Cle Elum are experiencing more frequent personal encounters with bear, elk, deer, coyote, and cougar because these animals are being pushed out of their natural habitat. Bullfrog Flats would exacerbate that problem. 1
- I am concerned about the Bullfrog Flats' impact on roads, the increasing number of students in the schools, and increased pressure on fire and police protection. 2
- I am concerned about the impact of additional traffic, which is already an issue as year-round traffic to our area is swelling. 3
- I am concerned about increased risk of wildfire and increased pressure on firefighters to protect a new development in addition to the towns and existing development as we face the increasing likelihood of wildfire due to the effects of climate change. 4
- I am concerned about increased danger caused by pressure on adequate routes for fire evacuation. Bullfrog Road is the only way out to I-90 for Roslyn, Ronald, Suncadia, and the Lake Cle Elum developments, that is, without going through Cle Elum. Adding more residents on Bullfrog Road could be life-threatening during an evacuation. 5
- I am concerned about the impact on the night sky caused by the lighting in the development. 6
- I am concerned that new development on Bullfrog Road could destroy the aesthetic experience of the drive to the Roslyn area from I-90, an increasingly threatened, beautiful transition through forest and wildlife habitat. 7

With respect,
Susan Johnson
P.O. Box 315
317 South Third Street Alley
Roslyn, WA 98941

On Fri, Oct 30, 2020 at 4:21 PM Susan Johnson <susanjohnsonwa@gmail.com> wrote:

Lucy,

I write to express my concerns for the proposed Bullfrog Flats Project. Following are my comments on the Draft SEIS. Please enter them into the record:

- I am concerned about loss of wildlife habitat, a critical issue in our area because of the encroachment of new development into wildlife habitat. Residents in Roslyn and in Cle Elum are experiencing more frequent personal encounters with bear, elk, deer, coyote, and cougar because these animals are being pushed out of their natural habitat. Bullfrog Flats would exacerbate that problem.
- I am concerned about the Bullfrog Flats' impact on roads, the increasing number of students in the schools, and increased pressure on fire and police protection.
- I am concerned about the impact of additional traffic, which is already an issue as year-round traffic to our area is swelling.

H-02

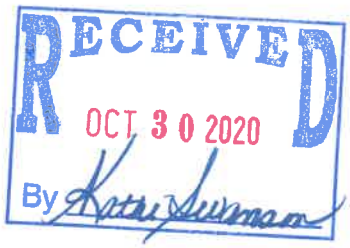
- I am concerned about increased risk of wildfire and increased pressure on firefighters to protect a new development in addition to the towns and existing development as we face the increasing likelihood of wildfire due to the effects of climate change.
- I am concerned about increased danger caused by pressure on adequate routes for fire evacuation. Bullfrog Road is the only way out to I-90 for Roslyn, Ronald, Suncadia, and the Lake Cle Elum developments, that is, without going through Cle Elum. Adding more residents on Bullfrog Road could be life-threatening during an evacuation.
- I am concerned about the impact on the night sky caused by the lighting in the development.
- I am concerned that new development on Bullfrog Road could destroy the aesthetic experience of the drive to the Roslyn area from I-90, an increasingly threatened, beautiful transition through forest and wildlife habitat.

With respect,
Susan Johnson
P.O. Box 315
317 South Third Street Alley
Roslyn, WA 98941

SEPAResponsibleOfficial

From: Susan Johnson <susanjohnsonwa@gmail.com>

Sent: Friday, October 30, 2020 4:21 PM
To: SEPAResponsibleOfficial
Cc: Susan Johnson
Subject: Comments on Bullfrog Flats



Lucy,

I write to express my concerns for the proposed Bullfrog Flats Project. Following are my comments on the Draft SEIS. Please enter them into the record:

- I am concerned about loss of wildlife habitat, a critical issue in our area because of the encroachment of new development into wildlife habitat. Residents in Roslyn and in Cle Elum are experiencing more frequent personal encounters with bear, elk, deer, coyote, and cougar because these animals are being pushed out of their natural habitat. Bullfrog Flats would exacerbate that problem.
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- I am concerned about the impact of additional traffic, which is already an issue as year-round traffic to our area is swelling.
- I am concerned about increased risk of wildfire and increased pressure on firefighters to protect a new development in addition to the towns and existing development as we face the increasing likelihood of wildfire due to the effects of climate change.
- I am concerned about increased danger caused by pressure on adequate routes for fire evacuation. Bullfrog Road is the only way out to I-90 for Roslyn, Ronald, Suncadia, and the Lake Cle Elum developments, that is, without going through Cle Elum. Adding more residents on Bullfrog Road could be life-threatening during an evacuation.
- I am concerned about the impact on the night sky caused by the lighting in the development.
- I am concerned that new development on Bullfrog Road could destroy the aesthetic experience of the drive to the Roslyn area from I-90, an increasingly threatened, beautiful transition through forest and wildlife habitat.

With respect,

Susan Johnson
P.O. Box 315
317 South Third Street Alley
Roslyn, WA 98941

Letter L-61

SEPAResponsibleOfficial

RECEIVED
OCT 19 2020
By Kathi Lukkarson

From: Callie Keller <kellerc@cersd.org>
Sent: Monday, October 19, 2020 9:19 AM
To: SEPAResponsibleOfficial
Subject: City of Cle Elum Community Center

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled.

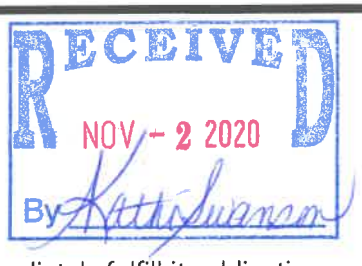
I am a teacher at Cle Elum-Roslyn School District. I can see the toll the lack of a safe location for students to gather takes on a community. Without safe engaging activities in a safe environment, students are coming up with their own idea of "fun." Honestly, I hear the stories, the things they are doing is scary. I would love to see a community center where people from Cle Elum could meet, play, and socialize. Ideally, I would love to see some basketball courts, an indoor track, batting cages, and a climbing wall. For our younger students, finding gym time to practice rec or league sports is nearly impossible. Court space would be absolutely amazing! A swimming pool would also be great so children not living in Suncadia could have access and have the opportunity to learn how to swim. As a parent, teacher, and community member, I worry about our students. I want them to be safe and engaged in positive activities. Please help me make this a reality. 1

Thank you for your time,
Callie Keller
1014 Denny Avenue
Cle Elum, WA 98922

--
Callie Keller
Math and Engineering Teacher
Cle Elum-Roslyn High School
(509) 649 - 4911

SEPAResponsibleOfficial

From: Christopher Keller <CKeller@frontlinepg.com>
Sent: Monday, November 02, 2020 11:37 AM
To: SEPAResponsibleOfficial
Subject: Bullfrog Flats Development Agreement



The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled.

Chris Keller
Cle Elum

H-02

Letter L-63

Douglas H Kilgore
PO Box 622
Roslyn, WA 98941

RECEIVED
NOV - 2 2020
By Kathy Swanson

October 29, 2020

SEPA Responsible Official at City of Cle Elum,
119 First Street
Cle Elum, WA 98922

Sent by e-mail: SEPAResponsibleOfficial@cityofcleelum.com

Re: 47° North Proposed Master Site Plan Amendment Supplemental Draft Environmental Impact Statement

To whom it may concern,

Thank you for the opportunity to comment on the 47° North Proposed Master Site Plan Amendment Supplemental Draft Environmental Impact Statement. I write as a resident of the City of Roslyn as a person who participated in the public process leading to approval of the Cle Elum Urban Growth Area's development agreement with the City of Cle Elum and as a person who was among those responsible for negotiating and administering the 2001 RIDGE Settlement Agreement with Trendwest (RIDGE SA) between 2001 and 2013.

The 2002 Final Environmental Impact Statement (FEIS) for the Cle Elum Urban Growth Area (UGA) analyzed the impacts of developing the UGA in combination with an analysis of the previously approved Trendwest Master Planned Resort (MPR). In so doing it incorporated within the analysis the beneficial effects of mitigations contained in the RIDGE SA that was concluded in September 2001, after approval of MPR permits but before the completion of the 2002 FEIS for the UGA. This is described in the FEIS:

> *"**RIDGE Settlement Agreement** In September 2001, Trendwest entered into a settlement agreement with RIDGE, a non-profit conservation organization. In return for RIDGE's commitment to withdraw outstanding appeals and refrain from legal challenges to future MPR and UGA approvals, Trendwest agreed to a number of project modifications. First, Trendwest agreed to reduce the MPR's project density. Second, Trendwest agreed to add an additional 550 acres of open space to the UGA and MPR projects. The new open space will be protected by conservation easements. Third, Trendwest agreed to provide a comprehensive package of economic and environmental benefits for the local community. These include, in part, a commitment to transfer water rights to the City of Roslyn to provide water for induced growth within Roslyn's municipal service area, and to provide water for expansion of the Cle Elum-Roslyn School District #404. The MPR-approved units, and the unit reductions agreed to by Trendwest for a Reduced Density MPR, are shown in Table 1-1. As described previously, cumulative impacts for the analysis of Alternative 5 are evaluated in combination with the Reduced Density MPR".* (Trendwest Properties: Cle Elum UGA Summary - Final EIS 1-7 March 18, 2002) (FEIS Table 1-1 showing MPR unit reductions is attached to this letter)

1

Following the preparation of the FEIS, the City of Cle Elum approved a development agreement with New Suncadia LLC's predecessor, Trendwest Inc., relying on Trendwest's commitment to implement the many community benefits and development mitigations contained in the RIDGE SA.

In 2013 the SA was terminated by order of Kittitas County Superior Court Judge Roger Sparks. as a result, Trendwest successor, New Suncadia LLC, was relieved of obligations contained in the RIDGE SA to mitigate impacts from resort development. Chief among these mitigations were the addition of 550 acres of open space within the MPR, commitments for public access to trails on much of this open space and an 18.6% reduction in the total number of single family residents, condominiums and hotel rooms to be built in the MPR. The 47 North Draft Supplemental Environmental Impact Statement (DSEIS) acknowledges the that the RIDGE SA existed, notes its 2013 termination, concludes that "the Settlement Agreement no longer pertains to the MPR or the Bullfrog Flats (and now 47° North) properties." (DSEIS p 65). The DSEIS, however, fails to analyze the impact of the 2013 removal of the RIDGE SA among the various changes in conditions that have occurred since the 2002 FEIS for the Cle Elum Bullfrog Flats UGA was prepared.. This letter is to request that such an analysis now be completed for inclusion within the 47 N SEIS. 1 cont'd 2

While some benefits of the RIDGE SA such as the transfer of lands and water rights to the City of Roslyn, remain in effect, others are completely lost. We believe this loss should be analyzed to enable a full assessment of impacts of renewed development within the UGA within the context of a substantial increase in the foreseeable cumulative impacts of MPR expansion that may reasonably be expected to occur now that such development may proceed without the limitations set forth in the RIDGE SA. 3

Loss of open space: The DSEIS does not analyze the impact of removals of open space from the 550 acres of previously protected open space within the MPR. Subsequent to the RIDGE SA's termination in 2013 it is our understanding that New Suncadia LLC requested and the Kittitas Conservation Trust (KCT) allowed removal of a certain number of acres of previously protected land from conservation easements that had been established within the MPR. These lands are now either being built upon or are being made available for sale and development. In our opinion, New Suncadia's act of "conservation in reverse" caused harmful impacts to wildlife within the MPR and adjacent communities, including the UGA and has reduced the benefits of those lands for residents and visitors to the region who had previously enjoyed access to these lands. The Final SEIS for 47° North should analyze the quantity and quality of lands that were un-conserved by the KCT at New Suncadia's request and should analyze impacts of these actions on wildlife, local community access to recreation and noise. 4

The FSEIS should also analyze increased incidents of wildlife nuisance caused in MPR-adjacent communities of Roslyn Ronald and Cle Elum resulting from this destruction of habitat and consequential displacement of wildlife. During the the last two years as development on previously protected open space has commenced, we in Roslyn, at least, have seen increased numbers of incursions by elk and deer within the City. While some see this phenomenon as a touristic amenity, others, witnessing destruction of their plants and gardens, see this as a harmful impact limiting the use of our property. 5

Increased residential density of MPR: As noted above, the termination of the RIDGE SA enabled New Suncadia LLC to build 865 more single family, condominium and hotel units than were allowed or analyzed in the 2002 FEIS for an overall increase in density of 18.6%. Table 6.3-3 reports that of the total allowable number of units within the MPR, 1129 have been constructed and 3271 remain to be constructed. An additional 250 allowable hotel units that were prohibited by the RIDGE SA but permitted by the MPR's Development Agreement with Kittitas County are not included within 6

this table. Relying on projections from New Suncadia as to the rate of construction within the MPR going forward, the SEIS concludes that only 1071 additional units will be constructed before 2037. We believe this analysis minimizes the number of units likely to be built during this period. The estimate presumes that in the future residential construction within the MPR will carry forward the average rate of construction of the first 18 years of MPR development (48 units per year). We believe the use of this average rate of past construction underestimates the probable or possible rate of residential development that may be anticipated during the period between now and 2037. The 18-year period use to calculate the average number of new units per year, includes the initial three years of MPR construction. During this period, however, development activity within the MPR was primarily focused on land clearing, site preparation and infrastructure - not homebuilding. The initial 18-year period also includes the years of the financial collapse between 2008 and 2011, during which New Suncadia's predecessor, Suncadia, was generally not moving forward with plans or obligations involving outlays of cash and not enjoying frequent property sales. During the financial collapse, it became difficult for buyers to finance purchases of the second and third homes for sale in the MPR using "jumbo loans", and demand for new homes that could be constructed was dampened by a large number of foreclosures on previous sales within the MPR. The use of a 48-unit per year average rate of new residential construction within the MPR has produced an unjustifiably low estimate in the average rate of construction within the MPR that can be expected to occur between now and 2037. The SEIS should analyze scenarios where New Suncadia LLC achieves full build-out of its 4650-unit entitlement by 2037 and should analyze scenarios where build out continues at the rate that has occurred in 2020. The SEIS should also analyze a scenario that includes full build out of the additional 250 hotel unit entitlement contained in New Suncadia's development agreement with Kittitas County. 7

To address the loss of these mitigations that softened the impact of anticipated development of the Cle Elum UGA we propose that New Suncadia LLC amend its Development Agreement with Kittitas County to restore the 18.6% reduction in residential units and that it increase lands protected from development within the resort to restore to protection, those lands that were designated for conservation easements in 2013, when the RIDGE SA was terminated. 8

Reduced Labor Standards within the MPR and UGA. The RIDGE SA also included certain provisions that established beneficial labor standards within the MPR and Cle Elum UGA. These requirements that were removed in 2013 are quoted, below:

> **1.8.5** Trendwest and its contractors will pay its construction and operation workers according to prevailing wage standards for Kittitas County as established by the Washington Department of Labor and Industries.
>
> **1.8.6** Trendwest will encourage its contractors and each tier of sub-contractors to provide health and welfare benefits. It is understood by the Parties that in some cases this action might not be feasible for small contractors with short-term employees. It is further understood by the Parties that employer contributions toward health and welfare benefits are included with wages or salaries to meet the prevailing wage standards. 9
>
> **1.8.7** Trendwest agrees to continue its practice of providing medical benefits to all Trendwest employees who work thirty (30) or more hours per week.

The DSEIS does not analyze the effect of this change in conditions since 2002. This letter is to request that the SEIS should include such an analysis to determine if Trendwest successor, New Suncadia LLC has maintained medical benefits for employees working 30 or more hours per week, whether any labor standards apply to its policies of procurement of construction services and if not, what are the actual wages currently paid to operation and construction workers in the MPR and UGA. 9 cont'd

In conclusion, we have observed that New Suncadia LLC and its predecessors have, in the past taken credit for mitigations to MPR and UGA development that were contained in the RIDGE Settlement Agreement and has been allowed latitude for development plans whose impact was softened by these mitigations. While this was justified when the RIDGE SA's protections were legally enforceable, we do not believe it is justified now that they are not. To assist those performing this analysis, we have attached pdf copies of the RIDGE SA including amendments that were concluded between 2001 and 2013. 10

Sincerely,

Doug Kilgore

1.6 RELATIONSHIP OF THE CLE ELUM UGA EIS TO THE MPR EIS

The Cle Elum UGA and the MountainStar MPR are geographically adjacent and are being developed by related companies. However, the UGA and MPR projects are independent of each other. The purpose and need for the UGA and MPR projects are significantly different. Also, the two projects fall under different legislative mandates and local code requirements. Neither project depends on any larger proposal for justification or implementation. Either project can proceed without the other project.

Because the nature of proposed development in the UGA and MPR is fundamentally different, impacts are also fundamentally different. The proposed uses in the UGA are being developed consistent with GMA goals and requirements for urban growth areas and include typical urban uses. The MPR is focused on destination resort facilities and short-term visitor accommodations, consistent with legislation for master plan resorts. These differences lead to differences in type, timing, and magnitude of impacts on the elements of the environment, such as transportation, population, economics, and public services.

Mitigation measures are analyzed in relationship to identified significant impacts (direct, indirect, and cumulative). Proposed mitigation measures are generally project-specific; however, there is overlap to the extent that project impacts from the MPR and UGA may affect the same service provider, facility, or infrastructure. In these cases, mitigation measures for the MPR and UGA reflect a potential coordinated approach. However, each project is obligated to address its own mitigation and would do so independent of the other project.

RIDGE Settlement Agreement

In September 2001, Trendwest entered into a settlement agreement with RIDGE, a non-profit conservation organization. In return for RIDGE's commitment to withdraw outstanding appeals and refrain from legal challenges to future MPR and UGA approvals, Trendwest agreed to a number of project modifications. First, Trendwest agreed to reduce the MPR's project density. Second, Trendwest agreed to add an additional 550 acres of open space to the UGA and MPR projects. The new open space will be protected by conservation easements. Third, Trendwest agreed to provide a comprehensive package of economic and environmental benefits for the local community. These include, in part, a commitment to transfer water rights to the City of Roslyn to provide water for induced growth within Roslyn's municipal service area, and to provide water for expansion of the Cle Elum-Roslyn School District #404. The MPR-approved units, and the unit reductions agreed to by Trendwest for a Reduced Density MPR, are shown in Table 1-1. As described previously, cumulative impacts for the analysis of Alternative 5 are evaluated in combination with the Reduced Density MPR.

Table 1-1: MountainStar Unit Reductions

Type of Unit	County Approved	Settlement Terms	Unit Reduction	Percentage Reduction
Single-Family Residence	3250	2695	555	17%
Condominium	850	790	60	7%
Hotel	550	300	250	45%
Totals	4650	3785	865	18.6%

Source: Trendwest 2001.

1.7 WATER RIGHTS CHANGE APPLICATIONS

In December 2000, Trendwest entered into a contract with the Washington Department of Ecology (Ecology) for the purpose of conducting additional environmental review and processing of Trendwest's water rights change applications. Over the course of 2001 and into 2002, Trendwest and the City of Cle Elum worked with Ecology to conduct additional environmental review of the Trendwest water transfer proposals and to incorporate that information into the City of Cle Elum's Final EIS. The detailed analysis of this additional environmental review and analysis of potential impacts from implementation of the water rights changes is included as Appendix B, the Water Supply Technical Report Supplement. Information from that report is summarized in Chapter 3.4, Water Supply, of the Final EIS.

Some of the environmental analysis that was performed disclosed additional information on specific water-related aspects of the MPR proposal. Kittitas County prepared an Addendum to the MPR Final EIS in March 2002. Information contained in the City of Cle Elum's EIS and MPR Final EIS Addendum is intended to satisfy any SEPA compliance requirements associated with the water rights change applications Trendwest has filed in connection with both the MPR and UGA developments.

1.8 WASHINGTON STATE HORSE PARK

In the Draft EIS, Alternatives 2 and 4 included a site for future development as an equestrian facility by the Washington State Horse Park Authority. Impact analyses for Alternatives 2 and 4 addressed potential impacts of the Horse Park, to the extent that project information was available. In Alternative 5, however, the Horse Park is not included. Instead, a 175-acre parcel adjacent to I-90 would be set aside as a "Reserve." Under the terms of an agreement between Trendwest and the Horse Park Authority, the Reserve would be donated to the Authority for development of the facility subject to a number of conditions:

- Trendwest would receive approvals from the City of Cle Elum and other agencies for land use, water supply, and water and wastewater treatment for its properties within the UGA.
- The Horse Park Authority would provide or complete all government approvals; a master plan; design and engineering; full funding for the first phase of the project; an operating plan; a project-specific SEPA review; mitigation measures; water rights; onsite utilities and roads,

H-02

Doug Kilgore
PO Box 622
Roslyn, WA
98941

RECEIVED
NOV - 2 2020
By WP 1:45 pm

SEPA Responsible
Official at
City of Cle Elum

Hand Delivered.

H-02

CD provided by
Doug Kelgore

Attachment to
Comments of Doug Kelgore
on DSEIS B-47 New
Project:

Contains copies of
all Agreements and amendments
to RIDGE Settlement Agreement
with Trendwest

2001 → 2007

EXHIBIT A

Legal Description for MountainStar Property

PARCEL A:

Lots 1A, 2A, 3A, 4A, 2B, 3B, and 4B as described and or delineated on the face of that certain Survey recorded June 13, 1995 under Auditor's File No. 582255 and filed in Book 21 of Surveys, Pages 44 and 45, Records of Kittitas County, State of Washington; being a portion of Section 11, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington;

AND

Lot B1 as described and/or delineated on that certain Survey as recorded September 18, 1996, in Book 22 of Surveys, Page 83, under Auditor's File No. 199609180020, records of Kittitas County, Washington; being a portion of the East Half of the Northwest Quarter and of the Northeast Quarter of the Northeast Quarter of Section 11, Township 20 North, Range 14 East, W.M., in the County of Kittitas, State of Washington.

PARCEL B:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B and 4B, as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581730 and filed in Book 21 of Surveys, Pages 28, and 29, Records of Kittitas County, State of Washington; being a portion of Section 13, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL C:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B and 4B, as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581729 and filed in Book 21 of Surveys, Pages 26 and 27, Records of Kittitas County, State of Washington; being all of Section 14, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL D:

Lots 2 and 4 as described and/or delineated on the face of that certain Survey recorded July 11, 1995 under Auditor's File No. 583027 and filed in Book 21 of Surveys, Page 64, Records of Kittitas County, State of Washington; being a portion of Section 15, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

(continued)

PARCEL E:

Lots 1, 2, 3 and 4 as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581725 and filed in Book 21 of Surveys, Page 19, Records of Kittitas County, State of Washington; being all of Section 23, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

EXCEPT that portion of Lot 3 of said Survey lying Southerly and Westerly of the Yakima River.

PARCEL F:

Lots 1A, 2A, 3A and 4A as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581724 and filed in Book 21 of Surveys, Page 18, Records of Kittitas County, State of Washington; being a portion of Section 24, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL G:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B and 4B as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581723 and filed in Book 21 of Surveys, Page 17, Records of Kittitas County, State of Washington; being a portion of Section 25, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL I:

Lots 1, 2, 3 and 4 as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581728 and filed in Book 21 of Surveys, Page 25, Records of Kittitas County, State of Washington; being a portion of Section 18, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington

AND

All that portion of the East Half of the Southeast Quarter of Section 18, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington, lying Southerly of the following described line: Beginning at the Southeast Corner of said Section 18; thence North 0°44'15" East, along the East line of said Section 1,155.00 feet and the true point of beginning of said line; thence North 67°00'00" West, 11424.23 feet to the West line of said East Half of the Southeast Quarter and terminus of said line.

(continued)

PARCEL J:

Lots 1A, 2A, 1B, 2B, 3B, 4B, 1C, 1D, 2D, 3D and 4D as described and/or delineated on the face of that certain Survey recorded June 13, 1995 under Auditor's File No. 582254 and filed in Book 21 of Surveys, Pages 42 and 43, Records of Kittitas County, State of Washington; being a portion of Section 19, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

PARCEL K:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B, 4B, 1C, 2C, 3C, 1D, 2D, 3D, 4D, 1E, 2E, 3E, 1F, 2F, 1G and 2G as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581726 and filed in Book 21 of Surveys, Pages 20, 21 and 22 and as amended November 7, 1997 in Book 23 of Surveys, Pages 17, 18 and 19 under Auditor's File No. 199711070002, Records of Kittitas County, State of Washington; being a portion of Section 20, Township 20 North, Range 15, East, W.M., Kittitas County, State of Washington.

PARCEL L:

All that portion of the Southwest Quarter of Section 21, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington, lying Southwesterly of the Southwesterly line of State Highway 2-E (SR 903)

EXCEPT beginning at a point on the Southwesterly line of said State Highway, said point bearing North 47°42' West, 1031.14 feet from the South Quarter corner of said Section 21; thence South 28°00' West, 300 feet; thence North 62°00' West to the intersection with the East line of County Road known as Bullfrog Road; thence North along said East line to the intersection with the Southwesterly line of said State Highway; thence Southeasterly along said Southwesterly line to the point of beginning;

EXCEPT that portion of the Southwest Quarter of said Section 21, lying within the following described tract:
Beginning at the intersection of the Southwesterly right of way line of State Highway No. 903 with the Southeasterly boundary of the tract of land heretofore conveyed by the Northwestern Improvement Company to Fred W. Schulz under Deed dated September 10, 1938, which point bears North 48°14'23" West, 1,028.73 feet from the South Quarter corner of said Section 21; thence Southeasterly along the Southwesterly right of way line of said State Highway No. 903, 1,597 feet; thence Southwesterly at right angles thereto, 900 feet; thence Northwesterly parallel to the Southwesterly right of way line of said State Highway No. 903, 1,597 feet, more or less, to a point on the extension of the Southeasterly boundary of the said tract conveyed by the Northwestern Improvement

(continued)

Company to Fred W. Schulz; thence Northeasterly along said extension and boundary, 900 feet to the point of beginning;

EXCEPT that portion of the Southwest Quarter of said Section 21, described as follows: Beginning at the intersection of the centerline of the Burlington Northern Railroad Spur to No. 9 Mine and the Southwesterly margin of Cle Elum to Roslyn Highway No. 903; thence South 36°45'23" East along the said road margin 355.21 feet to the West margin of the Bullfrog Cutoff Road; thence South 6°08'50" West along said road margin 375.00 feet; thence North 79°30'46" West 800.92 feet to the West line of said Section 21; thence North 0°06'18" East, along said Section line 475.00 feet to the centerline of said Railroad Spur; thence North 86°35'06" East 615.36 feet to the point of beginning;

EXCEPT that portion of the Southwest Quarter of the Southwest Quarter of said Section 21, Township 20 North, Range 15 East, W.M., Kittitas County, Sate of Washington, described as follows:
Beginning at a point 291.99 feet North and 800.30 feet East of the Southwest corner of said Section, said point being on the Easterly right of way line of the County Road as established November 13, 1947 date of that deed recorded January13, 1948, under Auditor's File No. 198871, Records of said County; thence North 89°44' East, parallel with the South line of said Section 548.30 feet to a point of the East line of said Subdivision; thence North 00°26' East, along said East line, 305 feet, more or less to a point 30 feet Southwesterly, when measured at right angles, from that tract of land conveyed by the Northwestern Improvement Company to Mike Pasa by the Deed dated June 20, 1934; thence north 62°00' West, 557.90 feet to the Easterly right of way of said County Road; thence South 05°51' West, along said right of way line, 572.20 feet to the point of beginning;

EXCEPT that portion of the Southwest Quarter of the Southwest Quarter of said Section 21, described as follows:
Beginning at a point 800.30 feet East of the Southwest corner of said Section;
thence 291.99 feet North, said point being on the Easterly right of way line of the County Road as established November 13, 1947, date of deed recorded January 13, 1948, under Auditor's File No. 198871, Records of said County; thence North 6°8'50" East, along said right of way, 572.20 feet to the point of beginning; thence South 62°00' East, 557.90 feet; thence North 0°14'31" East, 32.40 feet; thence North 62°00' West, 557.90 feet; thence South 6°08'50" West, 32.40 feet to the point of beginning.

AND

(continued)

EXCEPT that portion of the Southwest Quarter of said Section 21, lying within the following described tract:
Beginning at the intersection of the Southwesterly margin of State Highway No. 903 with the Southeasterly boundary of a tract of land heretofore conveyed by Northwest Improvement Company to Fred W. Schulz under Deed dated September 10, 1938, which point bears North 47°46'25" West, 1,028.73 feet from the South Quarter corner of said Section 21; thence continuing South 61°39'23" East along said road margin 1,597 feet to the true point of beginning; thence continuing South 61°39'23" East, 901.16 feet to the intersection of said road margin and the Northwesterly margin of the Rocky Reach-Maple Valley No. 1 Bonneville Transmission Line; thence South 73°16'17" West along said Bonneville Line margin 585.77 feet; thence continuing along said Bonneville Line margin South 73°07'39" West, 824.58 feet; thence North 61°39'23" West, 1,603.62 feet; thence North 28°20'37" East, 706.0 feet to a point on the South fence line of the aforementioned Fred W. Schulz Tract; thence South 61°39'23" East along said Schulz fence line 100.0 feet to a point on the Westerly line of the Cle Elum-Roslyn Public School District No. 404 Tract as deeded by Northern Pacific Railway Company under Deed dated October 27, 1967; thence South 28°20'37" West along said school Westerly line 606.0 feet to the Southwest corner thereof; thence South 61°39'23" East along said school Southerly line 1,597 feet to a point which bears South 28°20'37" West from the true point of beginning, thence North 28°20'37" East, 900.0 feet to the true point of beginning.

PARCEL N:

That portion of Lot 1A lying Northwesterly of the Southwest boundary of the County Road known as Bullfrog Road, as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's No. 581722 and filed in Book 21 of Surveys, Pages 14, 15 and 16, records of Kittitas County, State of Washington; being a portion of Section 28, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

PARCEL O:

Lots 1A, 2A, 3A and 4A as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581721 and filed in Book 21 of Surveys, Pages 12 and 13, Records of Kittitas County, State of Washington; being a portion of Section 29, Township 20 North, Range 15 East, W.M., Kittitas County, Sate of Washington.

(continued)

PARCEL P:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B, 4B, 1C, 2C, 3C, 4C, 1D, 2D, 3D and 4D as described and/or delineated on the face that certain Survey recorded May 23, 1995 under Auditor's File No. 581720 and filed in Book 21 of Surveys, Pages 10 and 11, and as amended by that certain Amended Survey recorded October 11, 1996 under Auditor's File No. 199610110005 and filed in Book 22 of Surveys, Pages 96 and 97, Records of Kittitas County, State of Washington; being a portion of Section 30, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

PARCEL Q:

Lots 1, 2, 3 and 4 as described and/or delineated on the face of that certain Survey recorded June 13, 1995 under Auditor's File No. 582256 and filed in Book 21 of Surveys, Pages 46 and 47, Records of Kittitas County, State of Washington; being a portion of the North Half of Section 31, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington;

EXCEPT that portion of said Lots 1 and 2 conveyed to the State of Washington by deed dated February 25, 1999, recorded March 12, 1999 under Kittitas County Auditor's File No. 199903120019 described as follows:

> All that portion of the hereinafter described Tract "A" lying southerly of a line beginning at a point opposite Highway Engineer's Station (hereinafter referred to as HES) 432 + 00 on the LW Line Survey of SR 90, Easton to Cle Elum and 300 feet northerly therefrom; thence easterly parallel with said LW Line Survey to a point opposite HES 446 + 25; thence southerly to a point opposite said HES 446 + 25 and 110 feet northerly therefrom; thence easterly to a point opposite HES 450 + 00 on said LW Line Survey and 90 feet northerly therefrom thence easterly parallel with said LW Line Survey to a point opposite HES 456 + 00 and the end of this line description.
>
> TRACT "A"
>
> Lots 1 and 2, as described and/or delineated on that certain survey recorded June 13, 1995 under Auditor's File No. 582256 in Book 21 of Surveys, pages 46 and 47, records of Kittitas County, State of Washington; being a portion of the North Half of Section 31, Township 20 North, Range 15 East, W.M., EXCEPT that portion of said Lot 2 lying within the Northeast Quarter of Section 31.

EXHIBIT B

Legal Description for UGA Property

LOT 1 AS DESCRIBED AND/OR DELINEATED ON THE FACE OF THAT CERTAIN SURVEY RECORDED MAY 23, 1995 UNDER AUDITOR'S FILE NO. 581718 AND FILED IN BOOK 21 OF SURVEYS, PAGES 6 AND 7, RECORDS OF KITTITAS COUNTY, STATE OF WASHINGTON;
BEING A PORTION OF THE NORTHWEST QUARTER OF SECTION 27, TOWNSHIP 20 NORTH, RANGE 15 EAST, W.M., KITTITAS COUNTY, STATE OF WASHINGTON;

TOGETHER WITH

LOTS 1A, 2A, 3A AND 4A AS DESCRIBED AND/OR DELINEATED ON THE FACE OF THAT CERTAIN SURVEY RECORDED MAY 23, 1995 UNDER AUDITOR'S FILE NO. 581722 AND FILED IN BOOK 21 OF SURVEYS, PAGES 14, 15 AND 16, RECORDS OF KITTITAS COUNTY, STATE OF WASHINGTON;
BEING A PORTION OF SECTION 28, TOWNSHIP 20 NORTH, RANGE 15 EAST, W.M., KITTITAS COUNTY, STATE OF WASHINGTON;
EXCEPT THAT PORTION OF SAID LOT 1A, LYING NORTHWESTERLY OF THE NORTHWESTERLY MARGIN OF BULLFROG ROAD; AND
EXCEPT THAT PORTION OF SAID LOT 2A, LYING NORTHERLY OF STATE HIGHWAY 2-E (SR 903);

TOGETHER WITH

LOTS 1B, 2B, 3B AND 4B AS DESCRIBED AND/OR DELINEATED ON THE FACE OF THAT CERTAIN SURVEY RECORDED MAY 23, 1995 UNDER AUDITOR'S FILE NO. 581721 AND FILED IN BOOK 21 OF SURVEYS, PAGES 12 AND 13, RECORDS OF KITTITAS COUNTY, STATE OF WASHINGTON;
BEING A PORTION OF SECTION 29, TOWNSHIP 20 NORTH, RANGE 15 EAST, W.M., KITTITAS COUNTY, STATE OF WASHINGTON;

TOGETHER WITH

LOTS 1E AND 1F AS DESCRIBED AND/OR DELINEATED ON THE FACE OF THAT CERTAIN SURVEY RECORDED MAY 23, 1995 UNDER AUDITOR'S FILE NO. 581720 AND FILED IN BOOK 21 OF SURVEYS, PAGES 10 AND 11, AND AS AMENDED BY THAT CERTAIN AMENDED SURVEY RECORDED OCTOBER 11, 1996 UNDER AUDITOR'S FILE NO. 199610110005 AND FILED IN BOOK 22 OF SURVEYS, PAGES 96 AND 97, RECORDS OF KITTITAS COUNTY, STATE OF WASHINGTON;
BEING A PORTION OF SECTION 30, TOWNSHIP 20 NORTH, RANGE 15 EAST, W.M., KITTITAS COUNTY, STATE OF WASHINGTON;

(continued)

TOGETHER WITH

LOTS 3 AND 4 AS DESCRIBED AND/OR DELINEATED ON THE FACE OF THAT CERTAIN SURVEY RECORDED JUNE 13, 1995 UNDER AUDITOR'S FILE NO. 582256 AND FILED IN BOOK 21 OF SURVEYS, PAGES 46 AND 47, RECORDS OF KITTITAS COUNTY, STATE OF WASHINGTON;
BEING A PORTION OF THE NORTH HALF OF SECTION 31, TOWNSHIP 20 NORTH, RANGE 15 EAST, W.M., KITTITAS COUNTY, STATE OF WASHINGTON

TOGETHER WITH

LOTS 1A, 2A, 3A, 4A AND LOT 1C AS DESCRIBED AND/OR DELINEATED ON THE FACE OF THAT CERTAIN SURVEY RECORDED FEBRUARY 21, 1997 UNDER AUDITOR'S FILE NO. 199702210003 AND FILED IN BOOK 22 OF SURVEYS, PAGE 178, RECORDS OF KITTITAS COUNTY, STATE OF WASHINGTON;
BEING A PORTION OF THE NORTH HALF OF SECTION 32, TOWNSHIP 20 NORTH, RANGE 15 EAST, W.M., KITTITAS COUNTY, STATE OF WASHINGTON;

TOGETHER WITH

ALL THAT PORTION OF THE NORTHWEST QUARTER OF THE NORTHWEST QUARTER OF SECTION 33, TOWNSHIP 20 NORTH, RANGE 15 EAST, W.M., KITTITAS COUNTY, STATE OF WASHINGTON, LYING NORTHWESTERLY OF THE NORTHWESTERLY LINE OF PRIMARY STATE HIGHWAY NO. 2 (I-90).

EXHIBIT C

[Binding Project Map]

H-02

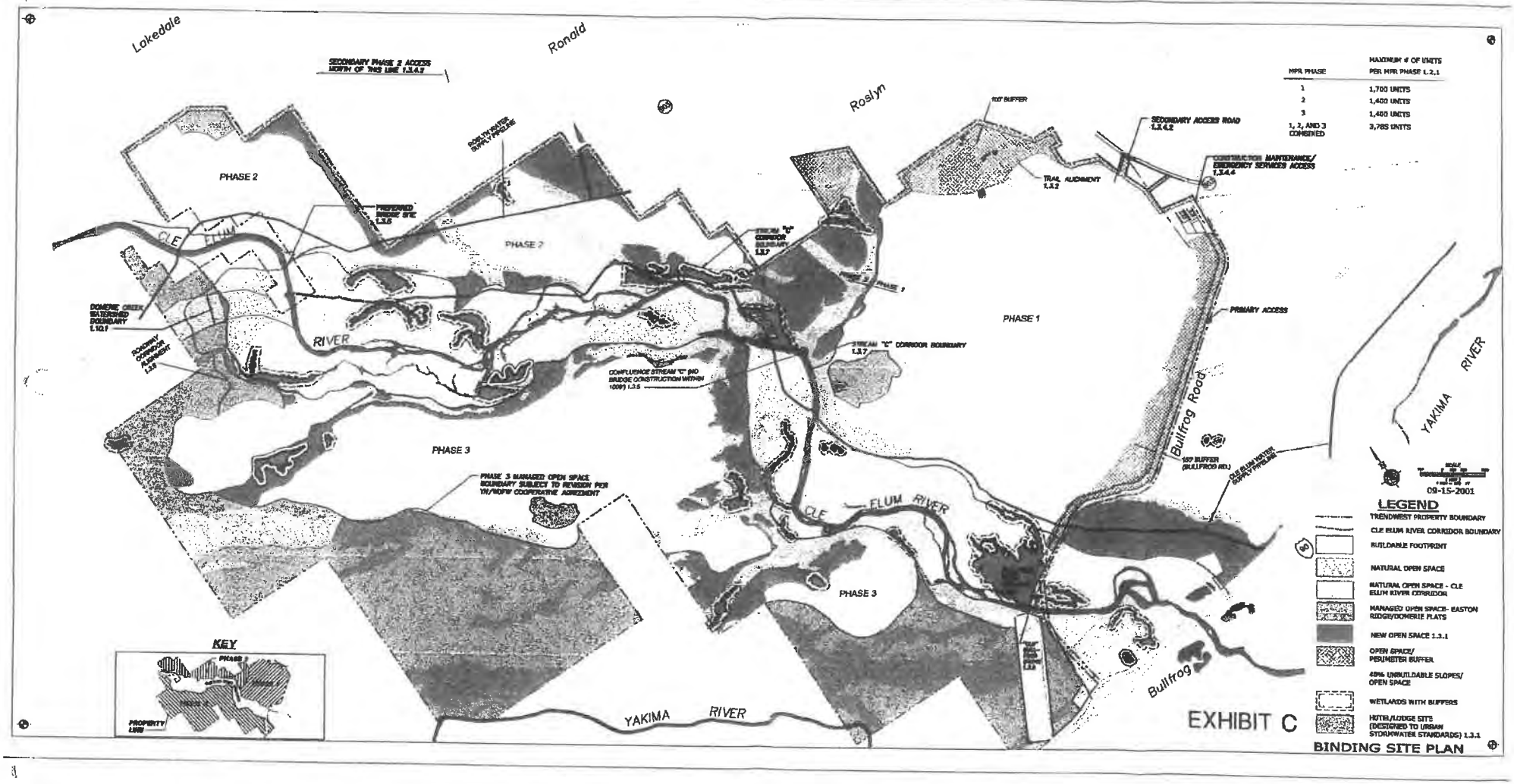

Lakedale
Ronald
Roslyn
SECONDARY PHASE 2 ACCESS NORTH OF THIS LINE 1.3.4.1
PHASE 2
PHASE 2
PHASE 1
PHASE 3
PHASE 3
CLE ELUM RIVER
RIVER
YAKIMA RIVER
Bullfrog Road
PREFERRED BRIDGE SITE 1.3.5
DOMERIE CREEK WATERSHED BOUNDARY 1.1.2.1
ROADWAY CORRIDOR ALIGNMENT 1.3.8
CONFLUENCE STREAM "C" AND BRIDGE CONSTRUCTION WITHIN 100ft 1.3.5
STREAM "C" CORRIDOR BOUNDARY 1.3.7
PHASE 3 MANAGED OPEN SPACE BOUNDARY SUBJECT TO REVISION PER YN/NDFW COOPERATIVE AGREEMENT
100' BUFFER
SECONDARY ACCESS ROAD 1.3.4.2
TRAIL ALIGNMENT 1.3.2
CONSTRUCTION MAINTENANCE/ EMERGENCY SERVICES ACCESS 1.3.4.4
PRIMARY ACCESS
100' BUFFER (BULLFROG RD.)
CLE ELUM WATER SUPPLY PIPELINE
MPR PHASE
MAXIMUM # OF UNITS PER MPR PHASE 1.2.1
1 1,700 UNITS
2 1,400 UNITS
3 1,400 UNITS
1, 2, AND 3 COMBINED 3,785 UNITS
09-15-2001
KEY
PROPERTY LINE
LEGEND
TRENDWEST PROPERTY BOUNDARY
CLE ELUM RIVER CORRIDOR BOUNDARY
BUILDABLE FOOTPRINT
NATURAL OPEN SPACE
NATURAL OPEN SPACE - CLE ELUM RIVER CORRIDOR
MANAGED OPEN SPACE- EASTON RIDGE/DOMERIE FLATS
NEW OPEN SPACE 1.3.1
OPEN SPACE/ PERIMETER BUFFER
45% UNBUILDABLE SLOPES/ OPEN SPACE
WETLANDS WITH BUFFERS
HOTEL/LODGE SITE (DESIGNED TO URBAN STORMWATER STANDARDS) 1.3.1
EXHIBIT C
BINDING SITE PLAN

EXHIBIT D

Definitions of Open Space Categories for the New Open Space within the MountainStar Property and Trendwest's UGA Property

Natural Open Space

This is open space dedicated primarily to wildlife habitat and recreational opportunities compatible with wildlife objectives. It includes all of Planning Area 11 on the MPR Conceptual Master Plan and the geomorphic floodplain in the UGA. These areas include the Cle Elum River corridor, on-site tributaries, and a major portion of the wetlands, the most environmentally sensitive areas on the property. It will include the parts of the Domerie Creek Watershed located in Section 11, 14 and 15 of Township 20 North, Range 15 East, W.M of the Trendwest Property. Motorized vehicles, building structures, vegetation disturbance, domestic animal use and human use will be subject to appropriate prohibitions and limitations. This open space shall be dedicated permanently and irrevocably by a conservation easement; provided, however, New Open Space is revocable as provided in Paragraph 3.0.

Managed Open Space

This is open space also dedicated to wildlife habitat and recreational opportunities compatible with wildlife objectives. It includes all of Planning Areas 9 and 10 on the MPR Conceptual Master Plan (Domerie Flats and Easton Ridge). It will include about 112 acres of New Open Space within Trendwest's UGA Property adjacent to the geomorphic floodplain. This open space may be more intensely managed or changed by selective logging, thinning or vegetation removal to establish better habitat conditions conducive to selected species, and to establish more useable area for recreation purposes. Though no residential development will occur on this open space, limitations on structures, motorized vehicles, domestic animal use and human use will be less restrictive than in the Natural Open Space. This open space shall be dedicated permanently and irrevocably by conservation easement; provided, however, New Open Space is revocable as provided in Paragraph 3.0.

Perimeter Buffer Open Space

This is open space dedicated primarily to buffering MPR uses from immediately adjacent lands. It includes those lands generally designated as buffers on the MPR Conceptual Master Plan on the perimeter boundary of the MPR. Trails and service roads may occur in this open space, though they will be developed as closely as practical to MPR developed lands rather than to adjacent properties. Some vegetation management may occur for fire protection purposes or habitat enhancement. This open space shall be dedicated permanently and irrevocably by conservation easement; provided, however, New Open Space is revocable as provided in Paragraph 3.0.

H-02

Note: The two approved golf courses in the MPR are not included in this Agreement's open space calculations. The open space ratio given in the MPR EIS considers them developed property. They include 295 acres.

EXHIBIT E

Take the right steps in your pathway to preparedness!

- ❑ Step 1: Evaluate yourself: strengths, weakness, likes, dislikes.
- ❑ Step 2: List occupational choices
- ❑ Step 3: Choose a pathway
- ❑ Step 4: Talk with parents and meet with an academic advisor
- ❑ Step 5: Determine remaining graduation requirements
- ❑ Step 6: Choose additional courses from those recommended
- ❑ Step 7: Register for classes

H-02

Pathways & Related Occupations

Washington State has developed five career pathways to help students focus their education. Those five pathways are:

- Arts & Communication
- Business & Marketing
- Engineering & Scientific
- Health & Human Services
- Industrial

Industrial Occupations

Mechanics

People in mechanics occupations use specialized mechanical skills to repair and maintain automobiles, power saws, watches, and other mechanical devices.

Construction

People in construction occupations usually have specialized skills that they use when working with people from other building trades. They may build and maintain roads, houses, office buildings, and other structures.

- Bricklayers
- Carpenters
- Cement Masons
- Construction Laborers
- Floor and Carpet Layers
- Glaziers
- Highway Maintenance Workers
- Insulation Workers
- Irrigation Technicians
- Painters/Paper Hangers
- Plasterers/Drywall Installers
- Plumbers
- Roofers

Timber Products

People in timber products occupations work with wood in various stages of production

- Cabinetmakers
- Chokesetters
- Fallers and Buckers
- Pulp and Paper Workers
- Sawmill/Plywood Laborers
- Woodworking Machine Operators

Building Maintenance

People in building maintenance occupations clean, repair, and maintain the interior and exterior of buildings

- Building Maintenance Workers
- Domestic Service Providers
- Janitors
- Pest Control Workers

Transportation Occupations

People in transportation occupations operate transportation equipment to move freight and passengers either directly or indirectly.

- Air Traffic Controllers
- Bus and Taxi Drivers
- Deckhands
- Dispatchers
- Forklift Operators
- Garbage Collectors
- Local Truck Drivers

Recommended Courses

Choose your additional courses—those that are above and beyond the courses required for graduation—from the list within your pathway.

Industrial

Entry Level

- ❑ Accounting
- ❑ Advanced Woods
- ❑ Applied Math
- ❑ Auto Mechanics
- ❑ AutoCAD
- ❑ Beginning Woods
- ❑ Biology I
- ❑ Business Communication
- ❑ Business Math/Marketing
- ❑ Composition/Literature
- ❑ Integrated Math1
- ❑ Physical Science
- ❑ Pre-algebra

Skilled Level

- ❑ Accounting
- ❑ Adv. Computer Topics
- ❑ Advanced Woods
- ❑ Applied Math
- ❑ Auto Mechanics
- ❑ AutoCAD
- ❑ Beginning Woods
- ❑ Biology 1
- ❑ Business Communication
- ❑ Business Math/Marketing
- ❑ Computer Applications
- ❑ Integrated Math 1
- ❑ Integrated Math 2
- ❑ Journalism
- ❑ Multimedia
- ❑ Physical Science
- ❑ Spanish 1
- ❑ Spanish 2
- ❑ Speech

Professional Level

- ❑ Adv. Computer Topics
- ❑ Advanced Woods
- ❑ Auto Mechanics
- ❑ AutoCAD
- ❑ Beginning Woods
- ❑ Biology 1
- ❑ Biology 2
- ❑ Business Communication
- ❑ Chemistry
- ❑ Computer Applications
- ❑ Construction
- ❑ Integrated Math 1
- ❑ Integrated Math 2
- ❑ Integrated Math 3

- ☐ Integrated Math 4
- ☐ Literary Background
- ☐ Modern British/American Literature
- ☐ Multimedia
- ☐ Physical Science
- ☐ Pre-calculus
- ☐ Spanish 1
- ☐ Spanish 2
- ☐ Spanish 3

Diversified Occupations & Community Resource Training

Course work and on-the-job experience may meet occupation educational or elective requirements. Students who are interested in the D.O. or CRT programs described below, must make arrangements with the instructor and complete any necessary paperwork. Enrollment by application process only: see the instructor.

Diversified Occupations **(.5-1.0 credit)**

Prerequisite: Eleventh-Twelfth grade standing and permission of the instructor

Diversified Occupations (D.O.) is a course that prepares the student for work after high school. Subject areas studied include: job applications, how to prepare a professional resume, job interview skills, pitfalls of credit cards, investment strategies, etc. This class is required for students who wish to take D.O. Release.

Diversified Occupations Release **(.5-1.0 credit)**

Prerequisite: Instructor approval. Co-requisite: D.O. Class

D.O. Release allows a student to earn "on the job" credit while attending high school. A minimum number of hours at work are required to earn a semester credit. This credit MUST be taken simultaneously with the D.O. classroom offering. "Earn while you learn" with D.O. Release.

Community Resource Training **(.5-1.0 credit)**

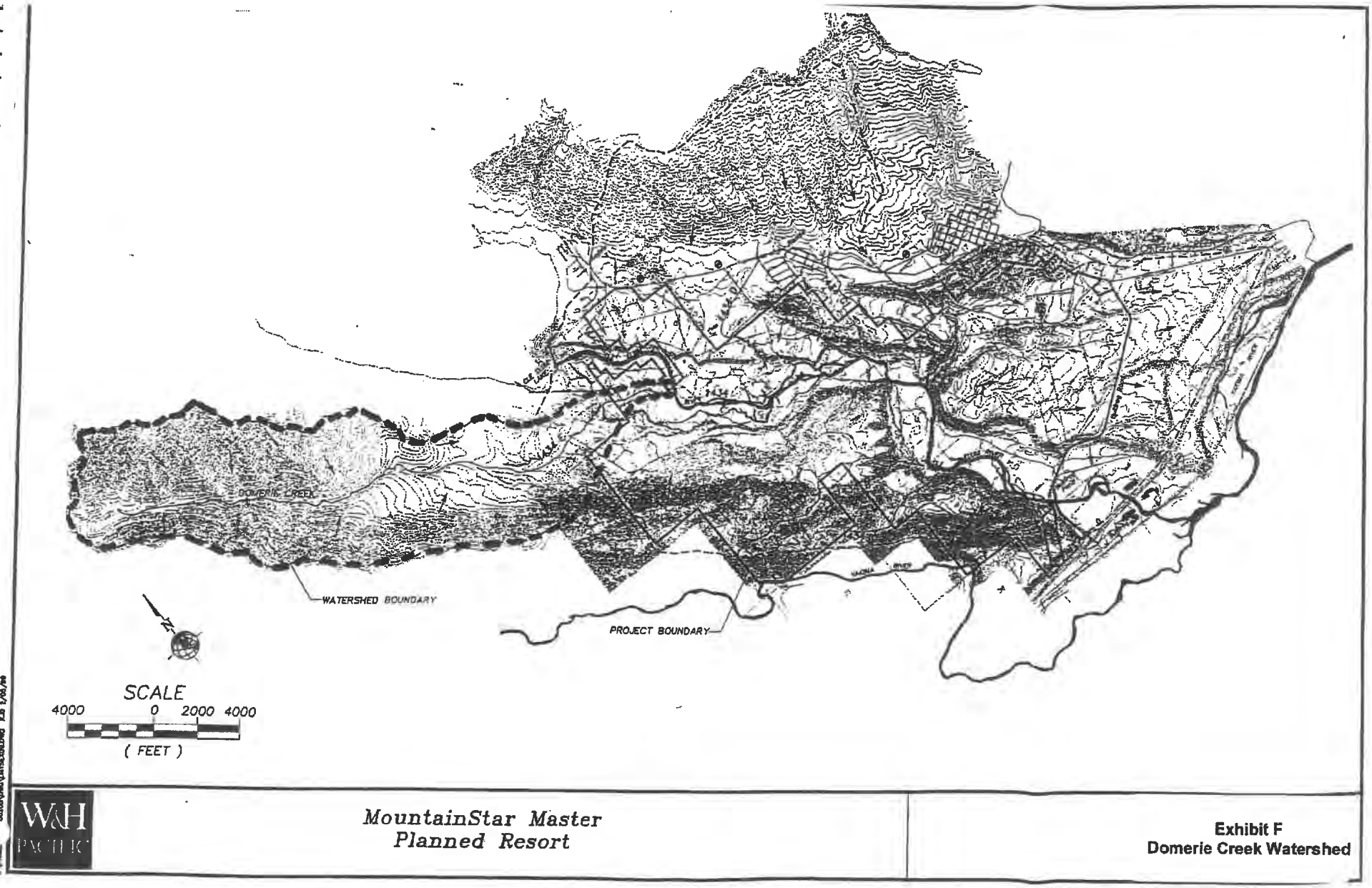
Prerequisite: Eleventh-Twelfth grade standing and instructor permission

Students participate in an apprentice-type program. They are released for one period per day to receive both training from community volunteers and experience in their chosen areas of interest. The place of training is considered to be a school classroom with the community trainer a volunteer teacher. This is an excellent opportunity to participate and experience possible career opportunities in your area of choice.

EXHIBIT F

[Map depicting Domerie Creek Watershed]

H-02



W&H PACIFIC

MountainStar Master Planned Resort

Exhibit F
Domerie Creek Watershed

EXHIBIT G

TRENDWEST YAKIMA RIVER WATER RIGHTS

Prior Claimant:	**Pautzke Bait Company - Hundley Ranch**
Court Claim Number:	01724
Change Applications:	CS4-YRB07CC01724@3 (MPR) CS4-01724(C)CTCL (UGA)
Amended Applications:	
Priority Date:	October 30, 1884
Point of Diversion:	NW 1/4 SW 1/4 NW 1/4 of Section 3, Twp. 17N, Range 18E, Willamette Meridian (WM).
Place of Use:	67 acres located in S 1/2 SE 1/4 of Section 3, Twp. 17N, Range 18E, WM.
Period of Use:	April 1 to October 15 for irrigation, continuous for stockwater
Annual Quantity:	1,609.0 ac-ft for irrigation, 6.88 ac-ft for stockwater
Instantaneous Quantity:	6.59 cfs for irrigation, 0.29 cfs for stockwater

Prior Claimant:	**Pautzke Bait Company - Riverside Ranch (south portion)**
Court Claim Number:	01724
Change Applications:	CS4-YRB07CC01724@2 (MPR) CS4-01724(B)CTCL (UGA)
Amended Applications:	
Priority Date:	October 30, 1884
Point of Diversion:	NW 1/4 SW 1/4 NW 1/4 of Section 3, Twp. 17N, Range 18E, WM.
Place of Use:	78 acres located in NW 1/4 SW 1/4 NW 1/4 of Section 3, Twp. 17N, Range 18E, WM.
Period of Use:	April 1 to October 15
Annual Quantity	967.2 ac-ft
Instantaneous Quantity:	3.9 cfs

Prior Claimant:	**Pautzke Bait Company – Riverside Ranch (north portion)**
Court Claim Number:	01724
Change Applications:	**CS4-YRBO7CC01724@1 (MPR)** **CS4-01724(A)CTCL (UGA)**
Amended Applications:	
Priority Date:	May 6, 1893
Point of Diversion:	SE 1/4 SW 1/4 NE 1/4 3 of Section 29, Twp. 18N, Range 18E, WM.
Place of Use:	146 acres located in N 1/2 of Section 3, Twp. 17N, Range 18E, WM.
Period of Use:	April 1 to October 15 for irrigation, continuous for stock water
Annual Quantity	1,825.0 ac-ft from April 1 to October 15 for irrigation and stock water; 375.0 ac-ft from October 16 to March 31 for stock water.
Instantaneous Quantity:	12.9 cfs from April 1 to October 15 for irrigation and stock water; 1.14 cfs from October 16 to March 31 for stock water.

TRENDWEST TRIBUTARY WATER RIGHTS

Teanaway River

Prior Claimant:	**Don & Gloria Walker**
Court Claim Number:	02255 (A) 04465 (A) 04493
Change Applications:	**CS4-YRB03CC02255 (MPR)** **CS4-02255(A)CTCL**
Amended Applications:	
Current Use:	Irrigation of 63 acres Stockwater
Period of Use:	May 1 to September 15
Annual Quantity:	340.2 acre-feet (irrigation) 1 acre-feet (stockwater)
Instantaneous Quantity:	1.26 cubic feet per second
Priority Date:	June 30, 1883
Point of Diversion:	Sec. 26, Twp. 20 N., Range 16 E.
Place of Use:	Sec. 26, Twp. 20 N., Range 16 E.

Prior Claimant:	**Don & Gloria Walker**
Court Claim Number:	02255 (A) 04465 (A) 04493
Change Applications:	**CS4-YRB03CC02255@1 (MPR)** **CS4-02255(B)CTCL**
Amended Applications:	
Current Use:	Irrigation of 70 acres Stockwater
Period of Use:	May 1 to September 15
Annual Quantity:	378.0 acre-feet (irrigation) 1 acre-feet (stockwater)
Instantaneous Quantity:	1.40 cubic feet per second
Priority Date:	June 30, 1883
Point of Diversion:	Sec. 26, Twp. 20 N., Range 16 E.
Place of Use:	Sec. 26, Twp. 20 N., Range 16 E.

Prior Claimant: **Don & Gloria Walker**

Court Claim Number:	02255 (A) 04465 (A) 04493
Change Applications:	**CS4-YRB03CC02255@2 (MPR)** **CS4-02255(C)CTCL (UGA)**
Amended Applications:	
Current Use:	Irrigation of 4.0 acres
Period of Use:	May 1 to September 15
Annual Quantity:	21.6 acre-feet
Instantaneous Quantity:	0.08 cubic feet per second
Priority Date:	June 30, 1883
Point of Diversion:	Sec. 26, Twp. 20 N., Range 16 E.
Place of Use:	Sec. 26, Twp. 20 N., Range 16 E.

Prior Claimant:	**Don & Gloria Walker**
Court Claim Number:	02255 (A) 04465 (A) 04493
Change Applications:	**CS4-YRB03CC02255@3 (MPR)** **CS4-02255(D)CTCL (UGA)**
Amended Applications:	
Current Use:	Irrigation of 34 acres
Period of Use:	May 1 to September 15
Annual Quantity:	183.60 acre-feet
Instantaneous Quantity:	0.68 cubic feet per second
Priority Date:	June 30, 1890
Point of Diversion:	Sec. 26, Twp. 20 N., Range 16 E.
Place of Use:	Sec. 26, Twp. 20 N., Range 16 E.

Prior Claimant:	**Don & Gloria Walker**
Court Claim Number:	02255 (A) 04465 (A) 04493
Change Applications:	**CS4-YRB03CC02255@4** **CS4-02255(E)CTCL (UGA)**
Amended Applications:	
Current Use:	Irrigation of 12.8 acres
Period of Use:	May 1 to September 15
Annual Quantity:	69.12 acre-feet
Instantaneous Quantity:	0.26 cubic feet per second
Priority Date:	June 30, 1898
Point of Diversion:	Sec. 26, Twp. 20 N., Range 16 E.
Place of Use:	Sec. 26, Twp. 20 N., Range 16 E.

Prior Claimant:	**Don & Gloria Walker**
Court Claim Number:	02255 (A) 04465 (A) 04493
Change Applications:	**CS4-YRB03CC02255@5 (MPR)** **CS4-02255(F)CTCL (UGA)**
Amended Applications:	
Current Use:	Irrigation of 4.0 acres
Period of Use:	May 1 to September 15
Annual Quantity:	21.6 acre-feet
Instantaneous Quantity:	0.08 cubic feet per second
Priority Date:	June 30, 1898
Point of Diversion:	Sec. 26, Twp. 20 N., Range 16 E.
Place of Use:	Sec. 26, Twp. 20 N., Range 16 E.

SWAUK CREEK

Prior Claimant:	**Kenneth Hartman, et al.**
Court Claim Number:	01685
Change Applications:	**CS4-YRB04CC01685@1 (MPR)***
	CS4-01685(C)CTCL (UGA)#
Amended Applications:	
Current Use:	Irrigation of 24.21 acres
Period of Use:	April 1 to October 15
Annual Quantity:	181.58 acre-feet
Instantaneous Quantity:	1.04 cubic feet per second
Priority Date:	June 30, 1878
Point of Diversion:	Sec. 27, Twp. 20 N., Range 17 E.
Place of Use:	Sec. 28 Twp. 20 N., Range 17 E.

* Original transfer application was for water rights appurtenant to 12.45 acres. The application does not include portion of the water right purchased in June 2001.

Original transfer application was for water rights appurtenant to 3.34 acres. The application does not include portion of the water right purchased in June 2001.

Prior Claimant:	**Kenneth Hartman, et al.**
Court Claim Number:	01685
Change Applications:	**CS4-YRB04CC01685 (MPR)****
	CS4-01685(D)CTCL (UGA)##
Amended Applications:	
Current Use:	Irrigation of 70.79 acres
Period of Use:	April 1 to October 15
Annual Quantity:	530.92 acre-feet
Instantaneous Quantity:	3.0 cubic feet per second
Priority Date:	September 20, 1889
Point of Diversion:	Sec. 27, Twp. 20 N., Range 17 E.
Place of Use:	Sec. 28 Twp. 20 N., Range 17 E.

** Original transfer application was for water rights appurtenant to 46.69 acres. The application does not include portion of the water right purchased in June 2001.

Original transfer application was for water rights appurtenant to 12.52 acres. The application does not include portion of the water right purchased in June 2001.

First Creek
(Swauk Creek Subbasin)

Prior Claimant:	**J.P Roan (FCWUA)**
Court Claim Number:	**00648**
Change Applications:	**CS4-YRB04CC00648 (MPR)**
	CS4-00648(A)CTCL (UGA)
Amended Applications:	
Current Use:	Irrigation of 46.07 acres
Period of Use:	April 1 to October 15
Annual Quantity:	231.3 acre-feet
Instantaneous Quantity:	1.8 cubic feet per second
Priority Date:	November 2, 1877
Point of Diversion:	Sec. 30, Twp. 20 N., Range 18 E.
Place of Use:	Sec. 17, 20 & 21 Twp. 20 N., Range 18 E.
Prior Claimant:	**James Nelson, et al. (FCWUA)**
Current Use:	Irrigation of 25.49 acres
Period of Use:	April 1 to October 15
Annual Quantity:	128.5 acre-feet
Instantaneous Quantity:	1.0 cubic feet per second
Priority Date:	November 2, 1877
Point of Diversion:	Sec. 30, Twp. 20 N., Range 18 E.
Place of Use:	Sec. 17, 20 & 21 Twp. 20 N., Range 18 E.

Prior Claimant:	**J.P Roan (FCWUA)**
Court Claim Number:	00648
Change Applications:	CS4-YRB04CC00648@1 (MPR)
	CS4-00648(B)CTCL (UGA)
Amended Applications:	
Current Use:	Irrigation of 104.16 acres
Period of Use:	April 1 to October 15
Annual Quantity:	522.9 acre-feet
Instantaneous Quantity:	3.2 cubic feet per second
Priority Date:	June 1, 1881
Point of Diversion:	Sec. 30, Twp. 20 N., Range 18 E.
Place of Use:	Sec. 17, 20 & 21 Twp. 20 N., Range 18 E.
Prior Claimant:	**James Nelson, et al. (FCWUA)**
Current Use:	Irrigation of 57.63 acres
Period of Use:	April 1 to October 15
Annual Quantity:	290.5 acre-feet
Instantaneous Quantity:	1.8 cubic feet per second
Priority Date:	June 1, 1881
Point of Diversion:	Sec. 30, Twp. 20 N., Range 18 E.
Place of Use:	Sec. 17, 20 & 21 Twp. 20 N., Range 18 E.

Big Creek
(Easton Subbasin)

Prior Claimant:	**Earl E. & Valerie K. Gentry**
Court Claim Number:	00755
Change Applications:	CS4-YRB02CC00755@2 (MPR)
	CS4-00755(A)CTCL (UGA)
Amended Applications:	
Current Use:	Irrigation of 81.5 acres
Period of Use:	May 1 to September 1
Annual Quantity:	393.0 acre-feet
Instantaneous Quantity:	1.53 cubic feet per second
Priority Date:	June 30, 1887
Point of Diversion:	Sec. 28, Twp. 20 N., Range 14 E.
Place of Use:	Sec. 28, Twp. 20 N., Range 14 E.

EXHIBIT H

Phasing of MPR and UGA Obligations

As per Paragraph 1.0, all of Trendwest's Obligations, unless otherwise specified in this Exhibit or elsewhere in this Agreement, shall become effective upon execution of this Agreement.

In Addition, Trendwest Obligations Triggered by Recording of First Final Plat for MPR Phase 1:

- Conveyance of conservation easements for New Open Space for MPR Phase 1 as shown on Binding Project Map (Paragraph 1.1)
- Trendwest contribution of $150,000 to the Conservation Trust organized by RIDGE for preservation of off-site habitat and open space (Paragraph 1.7)
- Trendwest contribution of $300,000 (payable as scheduled in Paragraph 1.12) to a trust fund for the promotion of Roslyn historic values
- Trendwest donation of $344,000 to Roslyn for capital improvements (payable as scheduled in Paragraph 1.13)
- Acceleration of water payments under Cooperative Agreement (Paragraph 1.5.3.3)
- Donation of Trendwest's Section 17 Property (Paragraph 1.14)
- Location of pedestrian/bike trial and related buffers for Phase 1B as shown on Binding Project Map (Paragraph 1.3.2)
- Stormwater treatment system for portions of Bullfrog Road located within geomorphic floodplain (Paragraph 1.9.4)
- Encourage volunteerism maintenance of public recreation facilities (Paragraph 1.17)
- Timing of left-turn lane off of State Hwy 903 into MPR at Number 9 Mine Rd. begins (Paragraph 1.3.4.3)

In Addition Trendwest Obligations Triggered by Recording of First Final Plat for MPR Phase 2:

- Conveyance of conservation easements for New Open Space for MPR Phase 2 (including the recording of a conservation easement for the Stream "C" Corridor) as shown on Binding Project Map (Paragraphs 1.1 and 1.3.7)

In Addition Trendwest Obligations Triggered by Beginning Construction of New Bridge across Cle Elum River:

- Relocation of road in Domerie Creek Basin (Paragraph 1.3.6)

In Addition, Trendwest Obligations Triggered by Recording of First Final Plat for MPR Phase 3:

- New Open Space for MPR Phase 3 as shown on Binding Project Map (Paragraph 1.1)
- Relocation of road in Domerie Creek Basin (Paragraph 1.3.6)

In Addition, Trendwest Obligations Triggered by Recording of the First Final Plat for the UGA:

- New Open Space in the UGA per the Binding Project Map (Paragraph 1.1)
- Payment of $150,000 to the Conservation Trust organized by RIDGE (Paragraph 1.7.3)
- Donation of Trendwest's Section 17 Property to Roslyn upon recording of first UGA plat if Trendwest terminates MPR Phase 1 (Paragraph 1.14)
- Trail connection with SR 903 to Bullfrog Bridge (Paragraph 1.15.5)

EXHIBIT I

[Map showing area boundaries for potential land acquisitions by Conservation Trust]

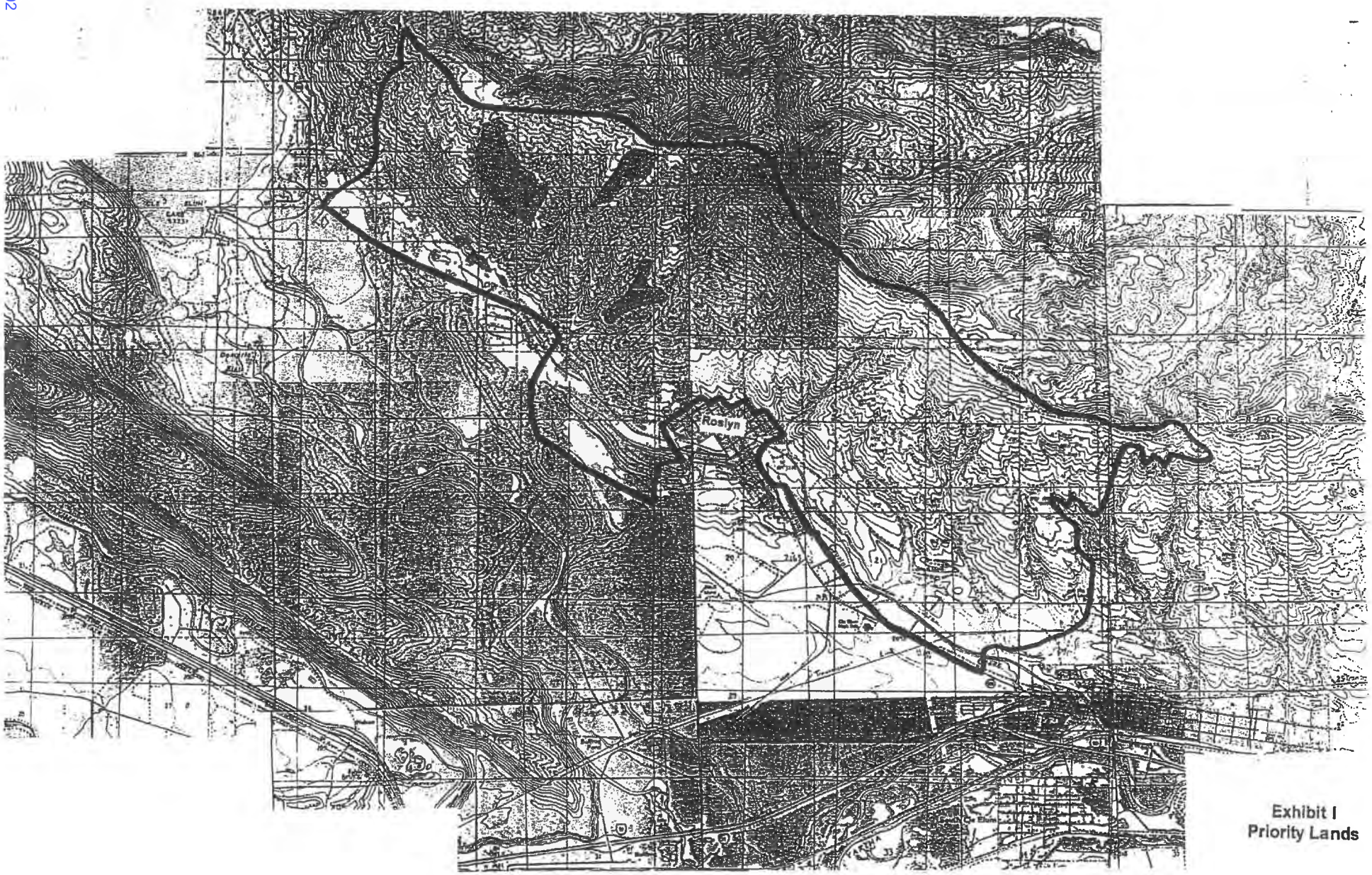


Exhibit I
Priority Lands



Exhibit J
Trendwest Property
Section 17

Letter L-63

FIRST AMENDMENT OF SETTLEMENT AGREEMENT REGARDING MOUNTAINSTAR MASTER PLANNED RESORT CLE ELUM URBAN GROWTH AREA AND SUPPORTING INFRASTRUCTURE AND SERVICES

THIS First Amendment of Settlement Agreement Regarding MountainStar Master Planned Resort, Cle Elum Urban Growth Area and Supporting Infrastructure and Services ("First Amendment") is entered into this 14th day of March, 2003, by and between Trendwest Investments, Inc., a Washington corporation, Trendwest Properties, Inc., a Washington corporation, MountainStar Resort Resources, Inc., a Washington corporation (collectively, "Trendwest"), and RIDGE, a Washington non-profit corporation ("RIDGE").

A. WHEREAS, the parties entered into that certain "Settlement Agreement Regarding MountainStar Master Planned Resort, Cle Elum Urban Growth Area and Supporting Infrastructure and Services" on September 22, 2001 ("Settlement Agreement"); and

B. WHEREAS, the parties have discovered certain errors in the legal descriptions attached to the Settlement Agreement as Exhibit A and Exhibit B; and

C. WHEREAS, the Kittitas County Board of Commissioners has amended the MountainStar Master Planned Resort ("MPR") approval to remove certain small parcels from the MPR boundary for conveyance to third parties, which the parties agree shall no longer be subject to the Settlement Agreement; and

D. WHEREAS, as part of an informal dispute resolution process under the Settlement Agreement, Trendwest has agreed to accelerate the date for recording of a conservation easement protecting the Stream "C" Corridor.

NOW, THEREFORE, in consideration of mutual considerations contained herein, the parties hereby agree as follows:

1. Exhibit A and Exhibit B of the Settlement Agreement are amended to read as attached hereto and incorporated herein by reference.

2. The Binding Site Plan incorporated as Exhibit C of the Settlement Agreement is amended to show the parcels that have been removed from the MPR, as shown on Exhibit C attached hereto and incorporated herein by reference.

3. Section 1.3.7 of the Settlement Agreement shall be amended by substitution as follows:

Upon the recording of the first final plat for Phase 1 of the MPR, Trendwest shall record a conservation easement protecting the Stream "C" Corridor depicted on the Binding Project Map. The conservation easement shall be based upon the general terms, reservations and restrictions set forth below.

4. Exhibit H of the Settlement Agreement shall be amended by substitution as follows:

EXHIBIT H

Phasing of MPR and UGA Obligations

As per Paragraph 1.0, all of Trendwest's Obligations, unless otherwise specified in this Exhibit or elsewhere in this Agreement, shall become effective upon execution of this Agreement.

In Addition, Trendwest Obligations Triggered by Recording of First Final Plat for MPR Phase 1:

- Conveyance of conservation easements for New Open Space for MPR Phase 1 as shown on Binding Project Map (Paragraph 1.1) (including the recording of a conservation easement for the Stream "C" Corridor) as shown on Binding Project Map (Paragraphs 1.1 and 1.3.7)
- Trendwest contribution of $150,000 to the Conservation Trust organized by RIDGE for preservation of off-site habitat and open space (Paragraph 1.7)
- Trendwest contribution of $300,000 (payable as scheduled in Paragraph 1.12) to a trust fund for the promotion of Roslyn historic values
- Trendwest donation of $344,000 to Roslyn for capital improvements (payable as scheduled in Paragraph 1.13)
- Acceleration of water payments under Cooperative Agreement (Paragraph 1.5.3.3)
- Donation of Trendwest's Section 17 Property (Paragraph 1.14)
- Location of pedestrian/bike trial and related buffers for Phase 1B as shown on Binding Project Map (Paragraph 1.3.2)
- Stormwater treatment system for portions of Bullfrog Road located within geomorphic floodplain (Paragraph 1.9.4)
- Encourage volunteerism maintenance of public recreation facilities (Paragraph 1.17)
- Timing of left-turn lane off of State Hwy 903 into MPR at Number 9 Mine Rd. begins (Paragraph 1.3.4.3)

In Addition Trendwest Obligations Triggered by Recording of First Final Plat for MPR Phase 2:

- Conveyance of conservation easements for New Open Space for MPR Phase 2

In Addition Trendwest Obligations Triggered by Beginning Construction of New Bridge across Cle Elum River:

- Relocation of road in Domerie Creek Basin (Paragraph 1.3.6)

In Addition, Trendwest Obligations Triggered by Recording of First Final Plat for MPR Phase 3:

- New Open Space for MPR Phase 3 as shown on Binding Project Map (Paragraph 1.1)
- Relocation of road in Domerie Creek Basin (Paragraph 1.3.6)

In Addition, Trendwest Obligations Triggered by Recording of the First Final Plat for the UGA:

- New Open Space in the UGA per the Binding Project Map (Paragraph 1.1)

  Payment of $150,000 to the Conservation Trust organized by RIDGE (Paragraph 1.7.3)
- Donation of Trendwest's Section 17 Property to Roslyn upon recording of first UGA plat if Trendwest terminates MPR Phase 1 (Paragraph 1.14)
- Trail connection with SR 903 to Bullfrog Bridge (Paragraph 1.15.5)

Signature pages attached

IN WITNESS WHEREOF, this Amendment has been entered into by and between Trendwest and RIDGE as of the day and year first above written.

TRENDWEST INVESTMENTS, INC., a Washington corporation

By: George C. Cockill
Its Vice Pres.

TRENDWEST PROPERTIES, INC., a Washington corporation

By: George C. Cockill
Its Vice Pres

MOUNTAINSTAR RESORT RESOURCES, INC., a Washington corporation

By: George C. Cockill
Its Vice Pres.

RIDGE, a Washington non-profit corporation

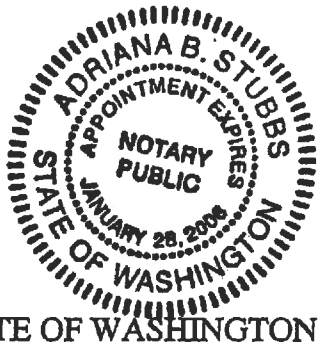
By Douglas H. Kirkeby
Its Registered Agent

STATE OF WASHINGTON)
) ss.
County of Kittitas)

On this day, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared George C. Cockill, to me known to be the Vice President of TRENDWEST INVESTMENTS, INC., a Washington corporation, the corporation that executed the foregoing instrument, and acknowledged that the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

H-02

GIVEN under my hand and official seal this 17th day of ~~February~~ March, 2003.

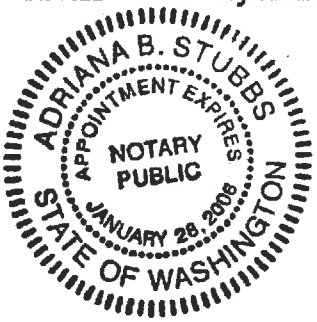


Printed Name: Adriana B Stubbs
Notary Public in and for the State of Washington
My commission expires: 1/28/06

STATE OF WASHINGTON)
) ss.
County of Kittitas

On this day, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared George C Cockill, to me known to be the Vice President of TRENDWEST PROPERTIES, INC., a Washington corporation, the corporation that executed the foregoing instrument, and acknowledged that the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

GIVEN under my hand and official seal this 14th day of ~~February~~ March, 2003.



Printed Name: Adriana B Stubbs
Notary Public in and for the State of Washington
My commission expires: 1/28/06

STATE OF WASHINGTON)
) ss.
County of Kittitas)

On this day, before me, the undersigned, a Notary Public in and for the State of Washington, duly commissioned and sworn, personally appeared George C Cockill, to me known to be the Vice President of MOUNTAINSTAR RESORT RESOURCES, INC., a Washington corporation, the corporation that executed the foregoing instrument, and acknowledged that the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute the said instrument.

H-02

GIVEN under my hand and official seal this 14th day of March, 2003.



Printed Name: Adriana B Stubbs
Notary Public in and for the State of Washington
My commission expires: 1/28/06

STATE OF WASHINGTON)
) ss.
County of Kittitas)

On this day personally appeared before me Douglas Kilgore, to me known to be the Registered Agent of RIDGE, a Washington non-profit corporation that executed the within and foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument.

GIVEN under my hand and official seal this 17th day of February 2003.



Printed Name: Terrie E. Nixdorff
Notary Public in and for the State of Washington
My commission expires: 3/25/03

H-02

EXHIBIT A
MountainStar Master Planned Resort

PARCEL A:

Lots 1A, 2A, 3A, 4A, 2B, 3B, and 4B as described and or delineated on the face of that certain Survey recorded June 13, 1995 under Auditor's File No. 582255 and filed in Book 21 of Surveys, Pages 44 and 45, Records of Kittitas County, State of Washington; being a portion of Section 11, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington;

AND

Lot B1 as described and/or delineated on that certain Survey as recorded September 18, 1996, in Book 22 of Surveys, Page 83, under Auditor's File No. 199609180020, records of Kittitas County, Washington; being a portion of the East Half of the Northwest Quarter and of the Northeast Quarter of the Northeast Quarter of Section 11, Township 20 North, Range 14 East, W.M., in the County of Kittitas, State of Washington.

PARCEL B:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B and 4B, as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581730 and filed in Book 21 of Surveys, Pages 28, and 29, Records of Kittitas County, State of Washington; being a portion of Section 13, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL C:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B and 4B, as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581729 and filed in Book 21 of Surveys, Pages 26 and 27, Records of Kittitas County, State of Washington; being all of Section 14, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL D:

Lots 2 and 4 as described and/or delineated on the face of that certain Survey recorded July 11, 1995 under Auditor's File No. 583027 and filed in Book 21 of Surveys, Page 64, Records of Kittitas County, State of Washington; being a portion of Section 15, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL E:

Lots 1, 2, 3 and 4 as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581725 and filed in Book 21 of Surveys, Page 19, Records of Kittitas County, State of Washington; being all of Section 23, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

EXCEPT that portion of Lot 3 of said Survey lying Southerly and Westerly of the Yakima River.

PARCEL F:

Lots 1A, 2A, 3A and 4A as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581724 and filed in Book 21 of Surveys, Page 18, Records of Kittitas County, State of Washington; being a portion of Section 24, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL G:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B and 4B as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581723 and filed in Book 21 of Surveys, Page 17, Records of Kittitas County, State of Washington; being a portion of Section 25, Township 20 North, Range 14 East, W.M., Kittitas County, State of Washington.

PARCEL I:

Lots 1, 2, 3 and 4 as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581728 and filed in Book 21 of Surveys, Page 25, Records of Kittitas County, State of Washington; being a portion of Section 18, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington

AND

All that portion of the East Half of the Southeast Quarter of Section 18, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington, lying Southerly of the following described line: Beginning at the Southeast Corner of said Section 18;
Thence N00°44'15"E, along the East line of said Section 1,155.00 feet and the true point of beginning of said line;
Thence N67°00'00"W, 1424.23 feet to the West line of said East Half of the Southeast Quarter and terminus of said line.

PARCEL J:

Lots 1A, 2A, 1B, 2B, 3B, 4B, 1C, 1D, 2D, 3D and 4D as described and/or delineated on the face of that certain Survey recorded June 13, 1995 under Auditor's File No. 582254 and filed in Book 21 of Surveys, Pages 42 and 43, Records of Kittitas County, State of Washington; being a portion of Section 19, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

PARCEL K:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B, 4B, 1C, 2C, 1D, 2D, 3D, 1E, 2E, 3E, 1F, 2F, 1G and 2G as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581726 and filed in Book 21 of Surveys, Pages 20, 21 and 22 and as amended November 7, 1997 in Book 23 of Surveys, Pages 17, 18 and 19 under Auditor's File No. 199711070002, Records of Kittitas County, State of Washington; being a portion of Section 20, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

AND

That portion of Number Nine Mine Road vacated by Kittitas County per Auditors File Number 200102120001 Records of Kittitas County, State of Washington.

EXCEPTING THEREFROM:

1. That portion of Lot 3E per a Boundary Line Adjustment granted by a Quit Claim Deed recorded under Auditor's file number 200102120046, records of Kittitas County, Washington. More particularly described as follows:
A parcel of land situated in the Southeast Quarter of the Northeast Quarter of Section 20, Township 20 North, Range 15 East, W.M., in the County of Kittitas, State of Washington,
Commencing at the East Quarter corner of said Section 20;
Thence N14°30'W, 47 feet to the centerline of Number Nine Mine Road as described per N.W.I. description on Record of Survey #576240;
Thence S50°37'06"W along the centerline of said Number Nine Mine Road, 388.83 feet;
Thence N39°22'54"W, 30.00 feet to the Northwesterly right-of-way of said Number Nine Mine Road, to an iron rod with LS cap stamped RFM 7172, said point being the southwesterly corner of the Browitt parcels as recorded in Volume 15, page 86, in surveys, and as recorded under Kittitas County Auditor's File No. 506262;
Thence N17°45'40"W along the westerly line of said Browitt parcel, 428.66 feet, to the **Point of Beginning** of this parcel;
Thence N63°26'57"W, 689.03 feet to the southerly property line of one John Butkovich;
Thence S85°32'48"E, 111.29 feet along the southerly line of said Butkovich property to an iron rod with LS cap stamped RFM 7172;
Thence S89°25'32"E, 396.42 feet to an iron rod with LS cap stamped RFM 7172, said iron rod being the southeasterly corner of said Butkovich property;
Thence continuing S89°25'32"E, 19.10 feet to the westerly line of a parcel recorded in Surveys Volume 19, page 227;
Thence S15°27'52"E, along the westerly line of said parcel, 110.38 feet to an iron rod with LS cap stamped RFM 7172, at the northwesterly corner of the aforementioned Browitt parcel;
Thence S17°45'40"E, 198.25 feet along said Browitt parcel to the **Point of Beginning** and terminus of this description.

2. That portion of the following described parcel lying within said Lot 2A:
Commencing at the Southwest corner of Section 17, Township 20 North, Range 15 East, W.M.;
Thence S89°13'59"E along the South line of said Section 17, a distance of 1517.19 feet to the **Point of Beginning;**
Thence leaving said section line, S00°46'01"W a distance of 34.69 feet;
Thence N89°31'41"E a distance of 132.49 feet;
Thence N84°28'06"E a distance of 191.37 feet;
Thence N88°10'22"E a distance of 239.19 feet, to said section line;
Thence along said section line N89°13'59"W a distance of 561.62 feet to the **Point of Beginning.**

3. That portion of the following described parcel lying within said Lot 3E:
Beginning at a rebar and cap that is illegible at the point of intersection of the South line of South Avenue, at its West end, with the boundary line of the Northwestern Improvement Company's South Addition to the City of Roslyn according to the plat thereafter filed in the office of the Auditor of said County, said point being 960.30 feet North and 662.69 feet West of the East quarter corner of said Section 20;
Thence S87°05'25"E, 20.04 feet to a rebar and cap that is illegible;
Thence S02°55'25"W, 123.15 feet to a rebar and cap stamped LS 30444;
Thence S17°46'48"E, 260.98 feet to a rebar and cap stamped LS 11715;
Thence S15°27'52"E, 64.73 feet to the Northeast corner of that Parcel granted by a Quit Claim Deed recorded under Auditor's file number 200102120046, records of Kittitas County, Washington;
Thence N89°25'32"W, 19.10 feet to a rebar and cap stamped RFM 7172;
Thence continuing N89°25'32"W, 396.42 feet to a rebar and cap stamped RFM 7172;
Thence N85°32'48"W, 181.39 feet to a rebar and cap stamped RFM 7172;
Thence N31°25'44"W, 233.64 feet to a rebar and cap stamped RFM 7172;
Thence N03°06'13"E, 121.68 feet;
Thence N19°48'40"W, 120.94 feet;

Thence N11°38'50"W, 89.29 feet;
Thence N10°27'10"E, 38.24 feet;
Thence S85°25'18"E, 263.56 feet to the Westerly line of Hoffmanville;
Thence S02°53'21"W along said Westerly boundary of Hoffmanville, 42.04 feet to a rebar and cap stamped RFM 7172 at the Northerly line of West South Avenue extended;
Thence S87°05'25"E along said extension of the North line of West South Avenue, 199.93 feet to a rebar and cap stamped LS 17670;
Thence S02°54'35"W, 49.80 feet to the Southwesterly corner of the parcel dedicated to the City of Roslyn per Short Plat #539246;
Thence S89°18'18"E, along said dedicated portion 196.15 feet to a point of the Westerly line at the End of the Platted West South Avenue;
Thence S02°54'35"W, 17.78 feet to the **Point of Beginning**.

4. That portion of Lot 2G as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581726 and filed in Book 21 of Surveys, Pages 20, 21 and 22 and as amended November 7, 1997 in Book 23 of Surveys, Pages 17, 18 and 19 under Auditor's File No. 199711070002, Records of Kittitas County, State of Washington; being a portion of Section 20, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington, lying within the following described parcel:

   Commencing at the Quarter Section corner common to Section 20 and Section 21, Township 20 North, Range 15 East, W.M.; thence South 00°06'07" West along the section line, a distance of 48.18 feet more or less to the southwesterly margin of State Route 903 and the beginning of a 1323.00 foot radius, non-tangent curve to the left, whose radius point bears North 65°16'25" East; thence southeasterly along said southwesterly margin and arc, through a central angle of 05°31'13", and an arc distance of 127.47 feet to the **TRUE POINT OF BEGINNING:**
   Thence South 50°37'06" West, a distance of 381.02 feet; thence South 20°33'36" East, a distance of 630.22 feet to a point that is 40.00 feet north, measured at right angles, of the centerline of the abandoned Burlington Northern Railroad right of way; thence North 86°35'29" East, parallel with said abandoned railroad right of way, a distance of 598.30 feet more or less to said southwesterly margin of State Route 903; thence North 33°28'40" West, along said southwesterly margin, a distance of 878.67 feet to the beginning of a 1323.00 foot radius curve to the right, whose radius point bears North 56°31'20" East; thence northwesterly along said southwesterly margin and arc, through a central angle of 03°13'52", and an arc distance of 74.61 feet to the True Point of Beginning.

PARCEL L:

Lot B2 as described and/or delineated on that certain Survey as recorded May 19, 1999 in Book 24 of Surveys, Page 73, under Auditor's File No. 199905190001, records of Kittitas County, Washington; being a portion of the West Half of the Southwest Quarter of Section 21,Township 20 North, Range 15 East, W.M., in the County of Kittitas, State of Washington.

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

AND EXCEPT that portion of Lot B2 as described and/or delineated on that certain Survey as recorded May 19, 1999 in Book 24 of Surveys, Page 73, under Auditor's File No. 199905190001, records of Kittitas County, Washington; being a portion of the West Half of the Southwest Quarter of Section 21,Township 20 North, Range 15 East, W.M., in the County of Kittitas, State of Washington, lying within the following described parcel:

Commencing at the Quarter Section corner common to Section 20 and Section 21, Township 20 North, Range 15 East, W.M.; thence South 00°06'07" West along the section line, a distance of 48.18 feet more or less to the southwesterly margin of State Route 903 and the beginning of a 1323.00 foot radius, non-tangent curve to the left,

whose radius point bears North 65°16'25" East; thence southeasterly along said southwesterly margin and arc, through a central angle of 05°31'13", and an arc distance of 127.47 feet to the **TRUE POINT OF BEGINNING:** Thence South 50°37'06" West, a distance of 381.02 feet; thence South 20°33'36" East, a distance of 630.22 feet to a point that is 40.00 feet north, measured at right angles, of the centerline of the abandoned Burlington Northern Railroad right of way; thence North 86°35'29" East, parallel with said abandoned railroad right of way, a distance of 598.30 feet more or less to said southwesterly margin of State Route 903; thence North 33°28'40" West, along said southwesterly margin, a distance of 878.67 feet to the beginning of a 1323.00 foot radius curve to the right, whose radius point bears North 56°31'20" East; thence northwesterly along said southwesterly margin and arc, through a central angle of 03°13'52", and an arc distance of 74.61 feet to the True Point of Beginning.

PARCEL N:

That portion of Lot 1A lying Northwesterly of the Northwest boundary of the County Road known as Bullfrog Road, as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's No. 581722 and filed in Book 21 of Surveys, Pages 14, 15 and 16, records of Kittitas County, State of Washington; being a portion of Section 28, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

PARCEL O:

Lots 1A, 2A, 3A and 4A as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581721 and filed in Book 21 of Surveys, Pages 12 and 13, Records of Kittitas County, State of Washington; being a portion of Section 29, Township 20 North, Range 15 East, W.M., Kittitas County, Sate of Washington.

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

PARCEL P:

Lots 1A, 2A, 3A, 4A, 1B, 2B, 3B, 4B, 1C, 2C, 3C, 4C, 1D, 2D, 3D and 4D as described and/or delineated on the face that certain Survey recorded May 23, 1995 under Auditor's File No. 581720 and filed in Book 21 of Surveys, Pages 10 and 11, and as amended by that certain Amended Survey recorded October 11, 1996 under Auditor's File No. 199610110005 and filed in Book 22 of Surveys, Pages 96 and 97, Records of Kittitas County, State of Washington; being a portion of Section 30, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

PARCEL Q:

Lots 1 and 2 as described and/or delineated on the face of that certain Survey recorded June 13, 1995 under Auditor's File No. 582256 and filed in Book 21 of Surveys, Pages 46 and 47, Records of Kittitas County, State of Washington; being a portion of the North Half of Section 31, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington;

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

AND EXCEPT: That portion of said Lots 1 and 2 conveyed to the State of Washington by deed dated February 25, 1999, recorded March 12, 1999 under Kittitas County Auditor's File No. 199903120019 described as follows:

All that portion of the hereinafter described Tract "A" lying southerly of a line beginning at a point opposite Highway Engineer's Station (hereinafter referred to as HES) 432 + 00 on the LW Line Survey of SR 90, Easton to Cle Elum and 300 feet northerly therefrom;
Thence easterly parallel with said LW Line Survey to a point opposite HES 446 + 25;
Thence southerly to a point opposite said HES 446 + 25 and 110 feet northerly therefrom;
Thence easterly to a point opposite HES 450 + 00 on said LW Line Survey and 90 feet northerly therefrom Thence easterly parallel with said LW Line Survey to a point opposite HES 456 + 00 and the end of this line description.

TRACT "A"

Lots 1 and 2, as described and/or delineated on that certain survey recorded June 13, 1995 under Auditor's File No. 582256 in Book 21 of Surveys, pages 46 and 47, records of Kittitas County, State of Washington; being a portion of the North Half of Section 31, Township 20 North, Range 15 East, W.M., EXCEPT that portion of said Lot 2 lying within the Northeast Quarter of Section 31.

EXHIBIT B
Cle Elum UGA (12/11/02):

PARCEL L(2):

Lot B3 as described and/or delineated on that certain Survey as recorded May 19, 1999 in Book 24 of Surveys, Page 73, under Auditor's File No. 199905190001, records of Kittitas County, Washington; being a portion of the West Half of the Southwest Quarter of Section 21,Township 20 North, Range 15 East, W.M., in the County of Kittitas, State of Washington.

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

PARCEL M:

Lot 1 as described and/or delineated on that certain Survey as recorded May 23, 1995 in Book 21 of Surveys, Pages 6 and 7, under Auditor's File No. 581718, records of Kittitas County, Washington; being a portion of the Northwest Quarter of Section 27, Township 20 North, Range 15 East, W.M., in the County of Kittitas, State of Washington.

PARCEL N(2):

That portion of Lot 1A lying Southerly and Easterly of the Southerly and Easterly boundary of the County Road known as Bullfrog Road, and Lots 3A and 4A, all as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's No. 581722 and filed in Book 21 of Surveys, Pages 14, 15 and 16, records of Kittitas County, State of Washington; being a portion of Section 28, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington;

AND

Lot 2A-2, as described and/or delineated on the face of that certain Survey recorded August 13, 1998, under Auditor's No. 199808130020 and filed in Book 23 of Surveys, Page 187, records of Kittitas County, State of Washington; being a portion of Section 28, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington;

EXCEPT a parcel of land lying in the Northeast Quarter of Section 28, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington, more particularly described as follows:
Commencing at the northeast corner of said Section 28;
Thence South 0°35'53" West, 1107.94 feet, along the East line of said Section 28 to the southwesterly right of way of State Route 903;
Thence North 61°39'20" West along said right of way, 339.18 feet to the Point of Beginning of this description;
Thence South 28°20'40" West, 699.06 feet to the beginning of a horizontal curve whose radius point bears North 61°39'20" West, 200.00 feet;
Thence southwesterly along the arc of said curve through a central angle of 89°59'08", 314.11 feet;
Thence North 61°40'12" West, 446.80 feet, to a concrete monument with a brass cap stamped "PSPL PROP COR";
Thence North 73°08'36" East, 400.02 feet, to a concrete monument with a brass cap stamped "PSPL PROP COR";
Thence North 16°51'23" West, 650.08 feet, to a concrete monument with a brass cap stamped "PSPL PROP COR";
Thence North 73°08'44" East, 221.64 feet, to the southwesterly right of way of State Route 903, said point being south 73°08'44" West, 1.24 feet of a concrete monument with a brass cap stamped "PSPL PROP COR";
Thence South 61°39'20" East, 670.00 feet along said right of way to the Point of Beginning and the terminus of this description.

PARCEL O(2):

Lots 1B, 2B, 3B and 4B as described and/or delineated on the face of that certain Survey recorded May 23, 1995 under Auditor's File No. 581721 and filed in Book 21 of Surveys, Pages 12 and 13, Records of Kittitas County, State of Washington; being a portion of Section 29, Township 20 North, Range 15 East, W.M., Kittitas County, Sate of Washington.

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

PARCEL P(2):

Lots 1E and 1F as described and/or delineated on the face that certain Survey recorded May 23, 1995 under Auditor's File No. 581720 and filed in Book 21 of Surveys, Pages 10 and 11, and as amended by that certain Amended Survey recorded October 11, 1996 under Auditor's File No. 199610110005 and filed in Book 22 of Surveys, Pages 96 and 97, Records of Kittitas County, State of Washington; being a portion of Section 30, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

PARCEL Q(2):

Lots 3 and 4 as described and/or delineated on the face of that certain Survey recorded June 13, 1995 under Auditor's File No. 582256 and filed in Book 21 of Surveys, Pages 46 and 47, Records of Kittitas County, State of Washington; being a portion of the North Half of Section 31, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington;

EXCEPT: That portion lying within the boundary of the County Road known as Bullfrog Road.

PARCEL R:

Lots 3A and 4A, as described and/or delineated on the face of that certain Survey recorded February 21, 1997, under Auditor's File No. 199702210003 and filed in Book 22 of Surveys, Page 178, records of Kittitas County, State of Washington; being a portion of the North Half of Section 32, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

AND

Lots 2A and 1C, as described and/or delineated on the face of that certain Survey recorded February 26, 2002, under Auditor's File No. 200202260030 and filed in Book 27 of Surveys, Page 91, records of Kittitas County, State of Washington; being a portion of the North Half of Section 32, Township 20 North, Range 15 East, W.M., Kittitas County, State of Washington.

The property now included in the UGA is described in the BLA between Peare and TW as a portion of Lot 2A, per the Boundary Line Adjustment filed under AFN 200202260030. The current Legal descriptiuon contained in exhibit B includes that portion by refereneing the filed Survey.

PARCEL S:

Lots 1A, as described and/or delineated on the face of that certain Survey recorded February 21, 1997, in Book 22 of Surveys, Page 177 under Auditor's File No. 199702210002, records of Kittitas County, State of Washington; being that portion of the Northwest Quarter of the Northwest Quarter of Section 33, Township 20 North, Range 15 East, W.M., lying northwesterly of the northwesterly line of Primary State Highway No. 2 (I-90), in the County of Kittitas, State of Washington.

TAX PARCEL NUMBERS (12/11/2002):

20-14-11000-0007	20-14-11000-0008	20-14-11000-0009	20-14-11000-0010
20-14-11000-0005	20-14-11000-0013	20-14-11000-0006	20-14-11000-0014
20-14-11000-0004	20-14-11000-0015	20-14-11000-0003	20-14-11000-0012
20-14-13000-0001	20-14-13000-0007	20-14-13000-0002	20-14-13000-0008
20-14-13010-0002	20-14-13010-0004	20-14-13010-0003	20-14-13010-0005
20-14-13000-0003	20-14-13000-0009	20-14-13000-0004	20-14-13000-0010
20-14-13000-0005	20-14-13000-0011	20-14-13000-0006	20-14-14000-0001
20-14-14000-0009	20-14-14000-0002	20-14-14000-0010	20-14-14000-0003
20-14-14000-0011	20-14-14000-0004	20-14-14000-0012	20-14-14000-0005
20-14-14000-0013	20-14-14000-0006	20-14-14000-0014	20-14-14000-0007
20-14-14000-0008	20-14-15000-0002	20-14-15000-0005	20-14-15000-0004
20-14-15000-0006	20-14-23000-0001	20-14-23000-0006	20-14-23000-0002
20-14-23000-0007	20-14-23000-0003	20-14-23000-0004	20-14-23000-0008
20-14-24000-0002	20-14-24000-0001	20-14-24000-0005	20-14-24000-0003
20-14-24000-0006	20-14-24000-0004	20-14-24000-0007	20-14-25000-0001
20-14-25000-0009	20-14-25000-0006	20-14-25000-0013	20-14-25000-0007
20-14-25000-0014	20-14-25000-0008	20-14-25000-0002	20-14-25000-0003
20-14-25000-0010	20-14-25000-0004	20-14-25000-0011	20-14-25000-0005
20-14-25000-0012	20-15-18030-0002	20-15-18030-0008	20-15-18030-0003
20-15-18030-0009	20-15-18030-0004	20-15-18030-0010	20-15-18030-0005
20-15-18030-0011	20-15-18040-0005	20-15-18040-0011	20-15-18040-0012
20-15-19000-0005	20-15-19000-0004	20-15-19000-0001	20-15-19000-0012
20-15-19000-0006	20-15-19000-0014	20-15-19000-0007	20-15-19000-0015
20-15-19000-0008	20-15-19000-0016	20-15-19000-0002	20-15-19000-0011
20-15-19000-0017	20-15-19000-0009	20-15-19000-0010	20-15-19000-0003
20-15-19000-0013	20-15-20000-0010	20-15-20000-0015	20-15-20000-0011
20-15-20000-0016	20-15-20000-0012	20-15-20000-0001	20-15-20000-0004
20-15-20000-0002	20-15-20000-0007	20-15-20000-0008	20-15-20000-0009
20-15-20000-0003	20-15-20000-0013	20-15-20040-0003	20-15-20040-0005
20-15-20040-0008	20-15-20040-0012	20-15-20040-0009	20-15-20012-0001
20-15-20012-0002	20-15-20012-0003	20-15-20013-0001	20-15-20013-0002
20-15-20013-0003	20-15-20013-0004	20-15-20013-0005	20-15-20040-0004
20-15-20040-0006	20-15-20040-0013	20-15-20040-0010	20-15-20040-0002
20-15-20040-0011	20-15-20040-0007	20-15-21030-0022	20-15-21030-0046
20-15-21030-0045	20-15-21030-0044	20-15-28000-0005	20-15-28000-0015
20-15-29000-0001	20-15-29000-0009	20-15-29000-0002	20-15-29000-0004
20-15-30000-0002	20-15-30000-0006	20-15-30000-0016	20-15-30000-0008
20-15-30000-0011	20-15-30000-0007	20-15-30000-0017	20-15-30000-0009
20-15-30000-0018	20-15-30000-0010	20-15-30000-0019	20-15-30000-0012
20-15-30000-0001	20-15-30000-0003	20-15-30000-0013	20-15-30000-0004
20-15-30000-0014	20-15-30000-0005	20-15-30000-0015	20-15-30040-0001
20-15-30040-0003	20-15-30040-0004	20-15-30040-0008	20-15-30040-0005
20-15-30040-0009	20-15-31020-0003	20-15-31020-0002	20-15-21030-0041
20-15-27020-0016	20-15-28000-0012	20-15-28030-0001	20-15-28040-0005
20-15-29000-0005	20-15-29000-0006	20-15-29000-0007	20-15-29000-0008
20-15-30040-0006	20-15-30040-0007	20-15-30040-0010	20-15-31010-0002
20-15-31010-0003	20-15-31010-0001	20-15-32010-0001	20-15-32010-0002
20-15-32020-0009	20-15-32020-0011	20-15-30000-0020	20-15-32020-0012
20-15-32020-0007	20-15-32020-0010	20-15-33020-0006	

SETTLEMENT AGREEMENT REGARDING MOUNTAINSTAR MASTER PLANNED RESORT CLE ELUM URBAN GROWTH AREA AND SUPPORTING INFRASTRUCTURE AND SERVICES

This Settlement Agreement ("Agreement") is entered into this _____ day of September, 2001 by and between Trendwest Resorts, Inc. ("Trendwest Resorts"), an Oregon corporation registered to conduct business in the state of Washington, Trendwest Investments, Inc. ("Trendwest Investments"), a Washington corporation, Trendwest Properties, Inc. ("Trendwest Properties"), a Washington corporation, MountainStar Resort Resources, Inc., a Washington corporation, and RIDGE ("RIDGE"), a Washington non-profit corporation. Trendwest Resorts, Trendwest Investments, Trendwest Properties, and MountainStar Resort Resources, Inc. are sometimes collectively referred to herein as "Trendwest." Trendwest and RIDGE are sometimes collectively referred to herein as "the Parties."

RECITALS

A. WHEREAS Trendwest Investments is the owner of certain real property consisting of approximately 6,217 acres located within Kittitas County, Washington, which property is more particularly described in the legal description attached as EXHIBIT A and incorporated herein by reference, and which, as discussed in the Recitals below, is proposed for development by Trendwest Resorts as the MountainStar Master Planned Resort (the "MPR Property"). The MPR ("MountainStar" or "Resort") for purposes of this Agreement shall mean the Trendwest MountainStar properties (as shown in Exhibit "A" attached) or the MPR development as described in this Recital, or both, as the context shall determine. Trendwest Investments is a wholly owned subsidiary of Trendwest Resorts.

B. WHEREAS Trendwest Investments is also the owner of certain real property consisting of approximately 1,200 acres located within the City of Cle Elum's Urban Growth Area (" Cle Elum UGA") in Kittitas County, Washington, which property is more particularly described in the legal description attached as EXHIBIT B and incorporated herein by reference, and which, as discussed in the Recitals below, is proposed for development by Trendwest as part of Cle Elum's UGA. For purposes of this Agreement, "UGA" shall be defined as Trendwest's properties within the Cle Elum UGA. The MPR Property and the UGA are sometimes collectively referred to herein as the "Trendwest Property."

C. WHEREAS Trendwest Properties is pursuing development of the UGA property for urban development as part of Cle Elum's UGA ("Cle Elum UGA"). Cle Elum is presently preparing an Environmental Impact Statement ("EIS") pursuant to the State Environmental Policy Act ("SEPA"), ch. 43.21C RCW, regarding Trendwest's proposed Master Plan for the UGA. For the purposes of this Agreement, Master Plan for the UGA shall be defined as the Master Plan for the Trendwest Property in the Bullfrog

Subarea, the Development Standards for that property and the Development Agreement for that property, as approved by the City of Cle Elum. The Draft EIS for the Cle Elum UGA ("UGA DEIS") was published in March 2001. For purposes of this Agreement, the UGA EIS shall be defined as the UGA Final EIS and the UGA Draft EIS, and Supplemental EIS (SEIS) as incorporated into the UGA Final EIS as may be approved by the City of Cle Elum. The SEIS shall be defined as that document prepared by the Washington State Department of Ecology (Ecology) regarding Trendwest's Change Applications.

D. WHEREAS RIDGE is a community organization of long standing, based in Roslyn, Washington and incorporated in 1989, whose stated mission is "To educate the public regarding forestry and land practices in Upper Kittitas County; to be a voice for citizens on maintenance of a sustainable ecosystem and economy; to monitor and seek enforcement of the Growth Management Act and other environmental laws in Upper Kittitas County." RIDGE has since its inception maintained an active role in public processes related to the management and development of the lands now known as the MPR and UGA.

1. Whereas the lands upon which the MPR and UGA are located contain valuable natural resources and amenities which the people and creatures of Upper Kittitas County and others have, in the past enjoyed and that these lands are documented to be of value in providing connectivity of wildlife habitat north and south across I-90 between Alpine Lakes Wilderness and Mount Rainier and east and west between Cle Elum River Corridor and the Teanaway River Valley.

2. Whereas RIDGE has entered into this Settlement Agreement with the purpose of realizing environmental benefits that will support a sustainable ecosystem in Upper Kittitas County and the Yakima River watershed. RIDGE has sought to advance the overall goal of achieving environmental benefits. Terms of this Settlement Agreement pursue RIDGE goals that include the following: (a) Retain and improve in-stream flows on Yakima River and its tributaries for protection of salmon; (b) Establish and protect habitat corridors that enable and enhance connectivity north and south across I-90 between Alpine Lakes Wilderness and Mount Rainier and east and west between Cle Elum River Corridor and the Teanaway River Valley; (c) Establish and protect open space with public access in Upper Kittitas County and in the Cle Elum River Valley; (d) Manage timber and wildlife within protected open-space on sustainable basis; (e) Protect City of Roslyn watershed in Domerie Creek from encroachment; (f) protect City of Roslyn water right from impairment; (g) Conduct development according to the best available planning and environmental standards and practices; (h) Protect the water quality in Yakima and Cle Elum River from degradation that could result from resort development; and (i) Mitigate possible impacts of resort construction and operation to maintain existing levels of environmental quality in Upper Kittitas County.

3. Whereas RIDGE has long sought to realize a sustainable economy in Upper Kittitas County and has entered into this Settlement Agreement in order to advance that purpose. Terms of this Settlement Agreement pursue RIDGE goals that

include the following: (a) Limit the scale of Trendwest development in Upper Kittitas County so that such development may be in balance with existing communities; (b) Establish and support employment standards and civil rights for workers involved in the construction and operation of the MPR and UGA; (c) Increase local residents' opportunities for employment resulting from MPR and UGA development; and (d) Protect the City of Roslyn and other Upper County Communities from the possibility of negative fiscal impacts arising out of Trendwest's development of the MPR and UGA.

4. Whereas RIDGE has long supported the preservation of the historic character of Roslyn and other Upper Kittitas County communities. Terms of this Settlement Agreement pursue RIDGE goals that include the following: (a) Protect the historic character and forested perimeter of the Cities of Roslyn and Ronald; (b) Retain local historic assets and materials as a public trust; (c) Support efforts aimed at historic preservation of buildings and other historic features; (d) Maintain the rural character of Upper Kittitas County; and (e) Protect Upper Kittitas County communities from impacts of traffic resulting from MPR and UGA construction and operation.

E. WHEREAS in March 1997 Trendwest Resorts submitted an application to Kittitas County to develop the MPR Property pursuant to RCW 36.70A.360, and the Master Planned Resort Policies in Kittitas County's Comprehensive Plan (chapter 2.4), as the MountainStar Master Planned Resort, including, but not limited to, (i) golf courses and other on-site indoor and outdoor recreational amenities, (ii) conference centers, (iii) hotels, condominiums, time-share units, resort chalets and single-family residential residences (including vacation and second homes), (iv) equestrian facilities, (v) an interpretive center, and (vi) open space.

F. WHEREAS pursuant to SEPA Kittitas County prepared a Draft EIS and Final EIS analyzing the probable significant adverse impacts of Trendwest's proposed "Conceptual Master Plan" for MountainStar. For purposes of this Agreement the Conceptual Master Plan shall be the graphic representation of the MPR development approved by Kittitas County on October 10, 2000 as Exhibit "B" of the Development Agreement, and as may be amended under the terms of the MPR Development Agreement. Following Administrative Appeals the BOCC found that the EIS was legally adequate by adopting Resolutions No. 2000-79 and 2001-57. For purposes of this Agreement, MPR EIS shall be defined as the Final EIS and the Draft EIS as incorporated into the Final EIS found legally adequate by Kittitas County through adoption of Resolutions 2000-79 and 2001-57.

G. WHEREAS on October 4, 2000 the BOCC voted unanimously to approve the MPR Approvals, and on October 10, 2000 executed the MPR Approval Documents on behalf of Kittitas County. For purposes of this Agreement the Development Agreement shall be defined as a Development Agreement between Trendwest and Kittitas County regarding the development of MountainStar, which incorporates Ordinances No. 2000-12, 2000-13, 2000-14, 2000-15, 2000-17, MountainStar Resort Conceptual Master Plan and Additional Development Standards and Design Guidelines, all as referenced in the Development Agreement Exhibits.

H. WHEREAS on October 27, 2000 RIDGE filed a "Land Use Petition and Petition for Declaratory Judgment" in Yakima County Superior Court challenging the Development Agreement between Trendwest and the County for MountainStar, the Site-Specific Rezone, the MPR Development Permit, and the Planned Action Ordinance, as well as challenging the legal adequacy of the MPR EIS under SEPA for purposes of the County's adoption of those Ordinances. Yakima County Superior Court Judge Susan Hahn issued her "Memorandum Opinion re Appeal" on May 29, 2001 denying RIDGE's LUPA Petition in its entirety. RIDGE has filed a Notice of Appeal with the Court of Appeals, Division 3, seeking review of Judge Hahn's decision, which appeal is captioned RIDGE v. Kittitas County, et al., Court of Appeals Case No. 20318-2-III (the "LUPA Appeal").

I. WHEREAS on December 8, 2000 RIDGE filed a Petition for Review with the Eastern Washington Growth Management Hearings Board ("Eastern Board"), challenging the BOCC's compliance with the Growth Management Act ("GMA"), ch. 36.70A RCW, in adopting the MountainStar Subarea Plan and MPR Zoning District, and the County's compliance with SEPA related to the adoption of those ordinances. Following a hearing on the merits, the Eastern Board issued a Final Decision and Order on June 7, 2001 finding that the County complied with the GMA and SEPA in adopting the MountainStar Subarea Plan and MPR Zoning District, except to the extent the Eastern Board concluded that the County failed to "coordinate" the MountainStar Subarea Plan with the City of Roslyn's Comprehensive Plan. On June 8, 2001, Trendwest filed a Petition for Review in Kittitas County Superior Court seeking review of the Growth Board's determination that the County failed to "coordinate" with Roslyn's Comprehensive Plan, which appeal is captioned Trendwest Resorts, Inc., et al. v. Eastern Washington Growth Management Hearings Board, et al., Kittitas County Cause No. 01-2-00219-1. On July 5, 2001, RIDGE filed a Petition for Review in Thurston County Superior Court seeking review of the Growth Board's FDO, which appeal is captioned RIDGE v. Eastern Washington Growth Management Hearings Board, et al., Thurston County Superior Court Cause No. 01-2-01222-1. On July 6, 2001, Kittitas County filed a Petition for Review in Kittitas County Superior Court seeking review of the Growth Board's determination that the County failed to "coordinate" with Roslyn's Comprehensive Plan, which appeal is captioned Kittitas County v. Eastern Washington Growth Management Hearings Board, et al., Kittitas County Cause No. 01-2-0271-9 (the "County GMA Appeal"). Trendwest, RIDGE, and Kittitas County's respective appeals of the Growth Board's FDO are collectively referred to herein as the "GMA Appeal."

J. WHEREAS Trendwest is pursuing two water rights strategies for providing water supply to MountainStar. One strategy involves transfer of water rights acquired by Trendwest through the State water rights program. Change of use applications are currently pending before the Washington Department of Ecology ("Ecology") for water rights owned by Trendwest to allow those water rights to be used on the Trendwest Property (the "Change Applications"). The second strategy involves an Exchange Contract with the United States Bureau of Reclamation ("Reclamation"). Both water supply strategies are analyzed to an extent in the MPR EIS. The transfer of water

rights through approval of the Change Applications by Ecology is Trendwest's preferred water supply alternative. Ecology is presently in the process of preparing a Supplemental EIS for Trendwest's Change Applications. Trendwest intends that the Change Applications will also provide for water necessary for development of the UGA Property.

K. WHEREAS the Parties acknowledge various governmental agencies and Puget Sound Energy are planning infrastructure projects in the Upper County and that such projects will, in part, support development in the MPR and UGA, and that other infrastructure and services are necessary for the MPR and UGA. The following projects, facilities and services shall be referenced herein as the "Infrastructure and Services Supporting the MPR and UGA": Cle Elum water treatment plant, including its related intake, storage and conveyance systems; waste water treatment plant ('Waste Water Treatment Plant'), including its related conveyance and outfall systems; County and state road improvements; County improvements to or expansions of the Solid Waste Transfer Station and services; expansion of the Roslyn-Cle Elum School District facilities and services; expansion of Puget Sound Energy's electrical substation and natural gas lines; fire, police, hospital and emergency services communications facilities and services; and cable, fiber optic lines, and other telecommunications facilities and services. Such projects, facilities and services shall be referenced herein as the "Infrastructure and Services Supporting the MPR and UGA."

L. WHEREAS the purpose of this Agreement is to settle all past, and present claims and controversies, and to avoid future claims and controversies between the Parties to this Agreement regarding the MPR Approvals and Trendwest's development of MountainStar, as well as to settle all claims, counterclaims and controversies between the Parties asserted in the GMA Appeal and the LUPA Appeal, as well as to settle all past and present claims and controversies, and avoid future claims and controversies between the Parties regarding the Cle Elum UGA and the UGA Property, as well as to settle all past and present claims and controversies, and avoid future claims and controversies regarding the Infrastructure and Services Supporting the MPR and UGA.

M. WHEREAS the Parties recognize that this Agreement anticipates a long-term cooperative relationship between Trendwest and RIDGE, and the Parties agree that they will approach that relationship and their individual performances under this Agreement in good faith. Where additional agreements are contemplated or become necessary, the Parties will cooperatively pursue such further agreements or, if required, seek appropriate mediation in order to implement the letter, and spirit and intent of this Agreement.

AGREEMENT

NOW, WHEREAS, in consideration of the promises and mutual promises, covenants and undertakings herein, the Parties hereto have agreed and hereby agree as follows:

1.0 Trendwest's Obligations. Trendwest agrees to the following obligations (sometimes collectively referred to individually as a "Trendwest Obligation" or collectively as "Trendwest's Obligations"), which unless otherwise specified, below (including in Exhibit "H"), shall become effective upon the execution of this Agreement.

1.1 Reduction of MPR and Cle Elum UGA Footprints.

1.1.1 Trendwest will add approximately four hundred thirty-eight (438) acres of New Open Space to the MPR, as shown on the Binding Project Map attached hereto as EXHIBIT C and incorporated by reference, and will add approximately one hundred twelve (112) acres of New Open Space to the Cle Elum UGA as also shown on the Binding Project Map (collectively the "New Open Space"). Due to their irregular shape, the acreage for the New Open Space pursuant to this Paragraph may be defined geographically rather than by legal description. The exact delineation of the boundaries of New Open Space will be field adjusted by mutual agreement, and the acreage figures may be recalculated as necessary to reflect the area of New Open Space that is mapped. The New Open Space will be designated mutually by RIDGE and Trendwest prior to recording of the conservation easements called for under Paragraphs 1.1.2 (New Open Space) and 1.3.7 (Stream "C" Corridor), below, of this Agreement into one of the Open Space classifications as defined in EXHIBIT D attached hereto and incorporated by reference; provided, however, that the New Open Space for the Cle Elum UGA shall be designated as Managed Open Space pursuant to the definition thereof in EXHIBIT D. The Parties acknowledge that the New Open Space in the UGA will be designated Managed Open Space and that the Stream "C" Corridor will be managed and designated pursuant to the terms set forth in Paragraph 1.3.7, below. As to the designation of the remaining New Open Space within the boundaries of the MPR, it is the intent of the Parties that lands contiguous with the Cle Elum River Corridor (as defined in the Cooperative Agreement) will generally be designated as Natural Open Space. Lands that extend away from the Cle Elum River Corridor will generally be designated as Managed Open Space taking into account the following site-specific considerations that may condition the designations: habitat management; infrastructure placement; and recreational opportunities. Any of the New Open Space may, in whole or in part, become part of the MountainStar Conservation Trust ("MCT"), as established under the December 4, 2000 "Cooperative Agreement Between the Washington Department of Fish and Wildlife ("WDFW"), Yakama Nation and Trendwest Resorts, Inc." ("Cooperative Agreement"), and may be applied towards meeting Trendwest's requirements for providing Open Space under the Cooperative Agreement.

1.1.2 The New Open Space will be conveyed by a conservation easement(s) to the MCT or another mutually agreed upon entity. The conservation easement(s) shall be perpetual and irrevocable but may be subject to re-conveyance to Trendwest in the event of a prohibited RIDGE Legal Challenge or a Third-Party Legal Challenge pursuant to Paragraph 3.0, below, or in the event of termination of this Agreement pursuant to Paragraph 4.0, below. The conservation easement(s) shall be consistent with the applicable definitions for the various classes of Open Space set forth in EXHIBIT D. The Binding Project Map delineates the boundaries of Phases 1, 2 and 3

H-02

of the MPR, and the UGA. A conservation easement for the New Open Space contained within each respective phase of the MPR will be conveyed upon the recording of the first final plat for that phase (e.g. the New Open Space within the boundaries of Phase 1 will be conveyed upon the recording of the first final plat for Phase 1). The New Open Space within the UGA will be conveyed upon the recording of the first final plat for the UGA. RIDGE will have the right to approve the form of the conservation easement(s) conveyed for compliance with the terms and purposes of this Agreement, which approval cannot be unreasonably withheld.

The first final plat in the UGA or any phase of the MPR shall, for purposes of this Agreement, be defined as the first final plat recorded within that phase or the UGA, or the issuance of building permit or a certificate of occupancy for any hotel, shopping center or condominium or recreational vehicle park located within that phase or within the UGA, whichever should occur first, even if such hotel, shopping center, condominium or recreational vehicle park is not separately platted.

1.2 Reduction of MPR Units.

1.2.1 The Parties recognize that the Development Agreement and MPR Permit approved by the County for the MPR authorize Trendwest to develop 4,650 Master Planned Resort Accommodation Units (as that term is defined in Section 2.0 of the MPR Development Agreement), also referred to in this document as "Units" or "Accommodation Units." Trendwest agrees to reduce the number of Units for the MPR as follows:

Type of Unit	County Approved	Settlement Terms	Reduction	%
Single Family Lots	3250	2695	555	17
Condominiums	850	790	60	7
Hotel Units*	550	300	250	45
Totals	4650	3785	865	18.6

*If Hotel Units are subject to a condominium declaration, such Units may, for purposes of this Agreement, still be considered "Hotel Units" rather than "Condominiums."

The Parties have agreed to limit the maximum number of Units to 3,785 Units, and agreed upon a maximum number of Units per phase of MPR development as indicated on the Binding Project Map. The maximum number of Units per MPR phase shall be as follows: Phase 1 = 1,700 Units; Phase 2 = 1,400 Units; and Phase 3 = 1,400 Units. Trendwest is bound by the overall cap (3,785 Units) established under this Agreement and recognizes that it will not be able to develop one or more of the MPR phases to the maximum number of Units set forth above.

1.2.2 The Parties further acknowledge that under the MPR Development Agreement Trendwest had, prior to execution of this Agreement, the right to seek modifications to the Conceptual Master Plan approved by the County for the

MPR, which amendments may include increasing the density or number of Units for the MPR above the 4,650 Master Planned Resort Accommodation Units authorized by the County. In agreeing to reduce the number of MPR Units to 3,785 Master Planned Resort Accommodation Units, Trendwest agrees not to seek any approvals from the County for greater than 3,785 Units. Trendwest will request, consistent with Paragraph 2.0, below, that the County modify the MPR Development Agreement and/or MPR Permit to reflect the reduction of Units consistent with this Paragraph, and agrees to be bound by the reduction of Units set forth in this Paragraph in the event the County declines to approve the requested modifications to the MPR Development Agreement and/or MPR Permit relating to the number of Units.

1.2.3 The Parties acknowledge and agree that while Trendwest has agreed through this Agreement to provide New Open Space as provided in Paragraph 1.1, above, and to reduce the number of MPR Units as set forth in this Paragraph, and to all the other Trendwest Obligations under this Agreement, Trendwest otherwise retains complete control regarding the configuration and design of the MPR and UGA, including but not limited to, the timing of MPR and UGA development, the size of building footprints, lots sizes, and building sizes, as restricted only by the Applicable Law in the MPR Development Agreement, the MPR Permit and Conditions of Approval, any applicable provisions of this Agreement, any development agreement and/or permit approved by Cle Elum for the UGA, and any other legal or contractual requirements.

1.3 Binding Project Map for the MPR and UGA. Trendwest agrees to the following changes to the Conceptual Master Plan for the MPR approved by the County, and to the proposed master plan for the UGA to be approved by Cle Elum.

1.3.1 Trendwest agrees to the Binding Project Map for the MPR and UGA as shown in EXHIBIT C. The Binding Project Map reflects Trendwest's commitment to the designation and location of New Open Space for the MPR, which shall be designated by the Parties pursuant to Paragraph 1.1.1, above, as "Natural," "Managed" and "Perimeter Buffer" Open Spaces as defined in EXHIBIT D, and New Open Space for the UGA (to be designated as Managed Open Space). The Binding Project Map is binding with regard to the following: the identification of New Open Space as described in Paragraph 1.1, above; the delineation of the MPR phase boundaries for Phases 1, 2 and 3, and the developable areas for the MPR and the UGA; the maximum Unit caps for the MPR and each phase thereof as described in Paragraph 1.2, above; the location of MPR hotel sites as described in Paragraph 1.3.3, below; the limitation on a Cle Elum River bridge crossing in the Stream "C" Corridor as described in Paragraph 1.3.5, below; the trail alignment between Number 9 Mine Road and Stream "C" as described in Paragraph 1.3.2, below; the preferred new bridge crossing across the Cle Elum River in the vicinity of the Old Winston Bridge, as described in Paragraph 1.3.5, below; the road alignment from Phase 2 to Phase 3 as described in Paragraph 1.3.6, below; the primary MPR access road off of Bullfrog Road, the secondary access road off of SR 903 at Number 9 Mine Road, and the proposed construction/maintenance entrance at the former "Gun Club Road" location, all as described in Paragraphs 1.3.4.2 and 1.3.4.4, below; location of the proposed secondary MPR entrance to Phase 2 as described

H-02

in Paragraph 1.3.4.2, below; the boundaries of the Stream "C" Corridor as described in Paragraph 1.3.7, below; and the current delineation of the Bullfrog Pond wetland and its associated buffers as discussed in Paragraph 1.9.4, below. All other information contained on the Binding Project Map is for information purposes only and shall not be binding under this Agreement. Trendwest agrees that General Site Plans, Site Development Plans and subdivision applications for the MPR, and development proposals for the UGA, will be consistent with the Binding Project Map, and that the total number of Units in developed areas will not exceed 3,785 Master Planned Resort Accommodation Units consistent with Paragraph 1.2, above, and will incorporate the Unit number caps for each phase as shown on the Binding Project Map.

1.3.2 Trendwest agrees to locate the pedestrian/bike trail proposed for MPR Phase 1B in the road right-of-way from Number 9 Mine Road to the reservoir access road as shown on the Binding Project Map. West of the reservoir access road the pedestrian/bike trial will leave the right-of-way and follow behind the back lot lines (Lots 381-395 as identified on the date of this Agreement) until intersecting the Stream "C" open space. There shall be no trails constructed elsewhere in the buffers adjacent to the City of Roslyn between Number 9 Mine Road and Stream "C."

1.3.3 Trendwest commits to the hotel sites identified on the Binding Project Map, and no others. The Parties understand and agree that the hotel sites shown as "bubbles" on the Binding Project Map are general areas in which the hotels may be located and that the exact locations of the hotel sites within the "bubbles" will be determined by Trendwest.

1.3.4 Trendwest agrees that:

1.3.4.1 Condition B-44 of Kittitas County Ordinance 2000-15 MPR Permit Conditions of Approval for the MPR will apply to the Number 9 Mine Road;

1.3.4.2 The primary motor vehicle access to the MPR shall be off of Bullfrog Road. Trendwest will propose one secondary motor vehicle access at the Number 9 Mine Road. Trendwest will propose one secondary motor vehicle access road off of Bullfrog Road to serve the developable land between the Cle Elum River and the forty percent (40%) slope in Phase 1. Trendwest will propose only one (1) secondary motor vehicle access to MPR Phase 1 and Phase 2 from north of Ronald (as shown on the Binding Project Map). Trendwest will propose only one motor vehicle access to Phase 3 from Bullfrog Road. Such limitations and decisions on motor vehicle access are subject to agency approval. In the area described in this Paragraph, Trendwest shall actively oppose any motor vehicle access to the MPR other than emergency motor vehicle access and motor vehicle access described in this paragraph, 1.3.4.2. Trendwest will meet condition C-13 of MPR Development Agreement (Conditions of Approval). Trendwest agrees that neither it nor its contractors shall use Horvat Road for construction traffic.

H-02

1.3.4.3 In the event Number 9 Mine Road is developed as an unrestricted secondary access road, Trendwest shall, subject to appropriate agency review and approval, install a left turn lane from SR 903 onto Number 9 Mine Road in Year 4 after the recording of the first final plat for the MPR. If the Number 9 Mine Road is developed as an unrestricted secondary access road but Trendwest, due to County or agency action, is unable to or prevented from installing the left turn lane, Paragraph 2.0 shall apply to arrive at a functional equivalent.

1.3.4.4 Trendwest shall propose to Kittitas County a construction entrance at the former "Gun Club Road." After completion of construction, this entrance would be used during MPR operation only for employees, maintenance and emergency services, but shall not be used as an entrance for MPR guests and residents.

1.3.5 Trendwest will not propose a bridge location across the Cle Elum River in the Stream "C" Corridor area as shown on the Binding Project Map. Trendwest is unable to commit to the location of road and utility corridors between Phases 1 and 2 due to uncertainty regarding easement acquisitions. Trendwest will propose, advocate and actively support a new bridge crossing only at the old Winston Bridge site. RIDGE agrees to actively support agency approval of a new bridge crossing at the Winston Bridge site. The Parties recognize that decisions regarding the bridge locations are subject to Yakama Nation and WDFW, and other agency, review, and Trendwest must comply with any agency decisions. Subject to agency approval, the "old" Bullfrog Bridge may be used only for utilities, trails, and maintenance/emergency vehicle access.

1.3.6 In order to maximize the effectiveness of the wildlife corridor in the Domerie Creek basin, Trendwest will relocate the road as shown on the Binding Project Map at the time construction begins on the bridge crossing the Cle Elum. An underground utility corridor will cross this same general area to serve Phase 3 of MPR development.

1.3.7 Upon the recording of the first final plat for Phase 2 of the MPR, Trendwest shall record a conservation easement protecting the Stream "C" Corridor depicted on the Binding Project Map. The conservation easement shall be based upon the general terms, reservations and restrictions set forth below.

1.3.7.1 Nature of Easement. The easement shall be a perpetual and irrevocable recording on the property, dedicating the property to (i) habitat and (ii) passive recreation purposes that will have minimal adverse impact on habitat; provided, however, that the conservation easement may be subject to reconveyance in the event of a prohibited RIDGE Legal Challenge or a Third-Party Legal Challenge as set forth in Paragraph 3.0, below, or in the event of termination of this Agreement under Paragraph 4.0, below.

H-02

1.3.7.2 Ownership. The fee title to the land shall remain in the ownership of Trendwest or its assigns. The easement shall be conveyed to the MCT or another mutually agreed upon entity.

1.3.7.3 Public Access. Kittitas County residents shall have equal access to the Stream "C" Corridor along with MountainStar Resort guests and residents. The Recreational User Statute (RCW 4.24.200, 4.24.210) shall apply to the use of the Stream "C" Corridor by any non-guest or non-resident of the MPR.

1.3.7.4 Management. Trendwest at its expense will manage this easement as part of the MountainStar Resort, providing appropriate security and maintenance.

1.3.7.5 Habitat Restoration. Trendwest will work with RIDGE, WDFW, the Yakama Nation, MountainStar residents and guests, and others interested in habitat restoration of this land, to develop a stewardship plan for this purpose. This effort shall be strictly voluntary, and shall not obligate Trendwest to any financial commitment for this purpose. Final decisions on a stewardship plan shall, subject to any required agency approval, be made by Trendwest but shall be consistent with the purposes of this Agreement.

1.3.7.6 Open Space Classification. Prior to conveyance of the conservation easement, this land shall generally be managed as Natural Open Space (as defined in EXHIBIT D attached hereto) subject to the restrictions and reservations set forth below to be included in the easement, with the exception that certain management protocols and activities as identified in the land stewardship plan for the Corridor will be necessary for habitat restoration that would not occur in Natural Open Space, such as the Cle Elum River corridor.

1.3.7.7 Restrictions. The easement will include a specific list of deed restrictions that constrain the use of the Stream "C" Corridor to protect habitat and recreation values of the Corridor. These restrictions will prohibit the following:

(1) Structures, except those necessary for the operation of MPR infrastructure, such as utilities and storm drainage (but not structures for water storage); and those that are appropriate to the purposes of the easement, such as casual recreation structures (e.g. picnic or rest areas, outlooks or exhibits)

(2) Motorized vehicles or equipment, except for maintenance and security vehicles in the Corridor, and except for those vehicles using the main MPR access road connecting Phase 1 and Phase 2.

(3) Overnight camping.

(4) Fires.

(5) Trails, except for one (1) trail as designated in the land stewardship plan for the area.

(6) Removal of live vegetation, except for the purposes identified in the land stewardship plan for the area.

(7) Impervious surfaces, except on the primary MPR access road.

(8) Mining or gravel extraction.

(9) Removal of dead or downed wood except for purposes of fire protection, public health and safety in conjunction with the land stewardship plan.

(10) Off-leash domestic pets.

(11) Stereos and radios audible to others beyond ten (10) feet) from the person with the stereo or radio.

1.3.7.8 Reservations. The conservation easement will reserve for Trendwest all rights accruing from its ownership of the land that are not restricted under the easement, and are not otherwise inconsistent with the purposes of the easement, including, but not limited to:

(1) The right to manage this area in accordance with the land stewardship plan for this area and the MPR Permit Conditions of Approval in a manner that is consistent with the purposes of this easement.

(2) The right to build structures necessary for the operation of the MPR infrastructure, such as utilities and storm drainage (but not water storage).

(3) The right to build and maintain one (1) main hard surfaced road and associated utility corridor connecting Phase 1 and Phase 2 of the MPR and designated in the land stewardship plan for the area. The right to build and maintain one (1) trail within the Stream "C" Corridor.

1.3.7.9 Permitted Uses. The use of the Stream C Corridor will be reserved for MPR owners, guests, and Kittitas County residents for the uses listed below.

(1) Hiking on designated trails.

(2) Mountain biking.

H-02

(3) Cross-country skiing.

(4) Picnicking.

(5) Mushroom hunting.

(6) Fishing, subject to appropriate regulation.

The general public may be granted more limited access rights.

1.4 **New Uses.** Trendwest agrees not to seek or accept approval for, or amendments to, the MountainStar Conceptual Master Plan to allow any of the following described uses on the MPR Property: (i) recreational and entertainment uses that are not integrated into the MPR, and that are designed and sized larger than necessary to serve MPR residents and their guests, lodging guests, and prospective purchasers/renters of MPR Units, including, but not limited to: an amphitheater larger than that analyzed in the MPR EIS; mechanized vehicle race tracks; permanent amusement parks, excluding amusement activities in the MPR Resort Center; water slide parks; stadiums; equestrian facilities larger than those analyzed in the MPR EIS; and casinos; (ii) trailer parks and recreational vehicle parks larger than those analyzed in the MPR EIS, provided that sewage from any permitted park is conveyed to the treatment facility that serves the MPR and that individual trailer and recreational vehicle spaces are considered Units for purposes of this Agreement, but not excluding storage for MPR guests and residents; and (iii) uses that are not typically associated with a master planned resort including industrial parks; shopping centers that exceed in size and scope the retail uses allowed by the current MPR Approvals and the current County MPR Policies; and jails, except for any holding facility(ies) or similar facility(ies) that may be required by local law enforcement agencies. This Paragraph 1.4 is to be construed in the event of ambiguity consistent with Paragraph 21.0, below, and shall not be construed in favor of one Party or the other.

1.5 **Water Supply.** Trendwest agrees to the following terms regarding water supply:

1.5.1 **Water Rights Processing.** Trendwest is seeking expedited processing of the Change Applications. RIDGE agrees to prepare and submit a letter to Ecology during the public comment period for the SEIS supporting the expedited processing of the Change Applications and explaining the environmental benefits associated with this Agreement.

1.5.2 **Reuse.** It is Trendwest's position that consumptive uses associated with the use of reclaimed wastewater may represent an increase of consumptive use over the consumptive use related to the water rights transferred under the Change Applications. Trendwest agrees to provide appropriate mitigation, as determined by Ecology, for increases in the consumptive use of water resulting from use of reclaimed wastewater by Trendwest.

1.5.3 Water Demand.

1.5.3.1 Trendwest will reduce Master Planned Resort Accommodation Units in the MPR as described in Paragraph 1.2 of this Agreement, thereby reducing the consumptive use demand.

1.5.3.2 Trendwest will reduce the UGA golf course irrigated area from one hundred ninety (190) acres to ninety (90) acres. Trendwest will not propose any alternate project to a golf course that would *divert* more than 288.5 acre feet per year. This represents a reduction in diversion demand from the 403 acre feet per year analyzed (alternative 3) in the Site Engineering section of the UGA DEIS of 114.5 acre feet per year. This saved water may be used to maintain artificial lake circulation and will be directed to an infiltration facility. Total diversion quantity will be measured by metering. Trendwest agrees not to increase treated water diversion above the four hundred and fifty-two (452) acre feet per year identified in the UGA DEIS Alternative 3, as a result of such alternative project.

1.5.3.3 Trendwest will accelerate the purchase or transfer of water rights for in stream flows under the Yakama Nation/WDFW Cooperative Agreement. Instead of providing Twenty Five Thousand Dollars ($25,000.00) of water rights each year over a twelve (12) year period, Trendwest will commit to providing Fifty Thousand Dollars ($50,000.00) of water rights per year for six (6) years.

1.5.3.4 Trendwest will agree not to seek water rights or diversions from Domerie Creek.

1.5.3.5 Trendwest agrees not to divert water from the Cle Elum River when stream flows are at or below levels recommended by the Bureau of Reclamation, Yakima Field Office, in consultation with the System Operations Advisory Committee (SOAC) or three hundred cubic feet per second, whichever is less, or from locations that would adversely affect wetlands or other aquatic resources, including salmonid habitat, as determined by the appropriate regulatory agencies.

1.5.3.6 Trendwest will propose, advocate and actively support locating Cle Elum's municipal water intake on the Cle Elum River at a location having no adverse impacts on the Bullfrog Pond wetlands.

1.5.3.7 Trendwest will negotiate an agreement with the City of Roslyn that will provide Roslyn with an additional water right to provide for growth in the Roslyn-Cle Elum School District resulting from the MPR and the UGA. The Parties agree that the quantity of the additional water right will be based for the first five (5) years upon modeling used in the UGA EIS to measure such impacts, and thereafter shall be adjusted based upon actual impacts as determined by monitoring as required in the MPR Development Agreement and the UGA Master Plan. In the event the City of Roslyn and Trendwest have not executed the agreement described in this

H-02

Paragraph 1.5.3.7 prior to the recording of the first final plat of the MPR or UGA, the negotiation shall be remanded to RIDGE and Trendwest, and the provisions of Paragraph 17.0 shall apply to arrive at a functional equivalent to this provision.

1.5.3.8 Trendwest will negotiate an agreement with the City of Roslyn that will provide Roslyn with an additional water right to mitigate for increased water demands on Roslyn resulting from induced off-site development within Roslyn. The Parties agree that the quantity of the additional water right will be based for the first five (5) years upon modeling used in the UGA EIS to measure such impacts, and thereafter shall be adjusted based upon actual impacts as determined by monitoring as required in the MPR Development Agreement and UGA Master Plan. In the event the City of Roslyn and Trendwest have not executed the agreement described in this Paragraph 1.5.3.8 prior to the recording of the first final plat of the MPR or UGA, the negotiation shall be remanded to RIDGE and Trendwest, and the provisions of Paragraph 17.0 shall apply to arrive at a functional equivalent to this provision.

1.5.3.9 To the extent not already mitigated under the terms of the Cooperative Agreement or through other agreements which Trendwest may enter into regarding the use of Trendwest water, Trendwest agrees to provide additional mitigation for induced off-site housing impacts, which may include the transfer of water rights to Ecology's Yakima River Trust Water Program or such other mitigation agreed to by Trendwest and the appropriate regulatory agency, to mitigate for consumptive uses of water associated with induced off-site housing outside Roslyn's service area. The Parties agree that the quantity of the additional water right will be based for the first five (5) years upon modeling used in the UGA EIS to measure such impacts, and thereafter shall be adjusted based upon actual impacts as determined by monitoring as required in the MPR Development Agreement and UGA Master Plan. If the appropriate regulatory agency does not agree to measure impacts in this manner, Paragraph 17.0 shall apply to arrive at a functional equivalent to this provision.

1.5.3.10 Trendwest agrees not to transfer water rights to, or provide water service for, lands within the area identified in Paragraph 1.7 (Preservation of Off-Site Habitat and Open Space), below.

1.5.3.11 Trendwest will provide mitigation as determined by the appropriate regulatory agencies for impacts from the change in seasonality of water rights proposed for transfer by Trendwest.

1.5.4 Water Quality.

1.5.4.1 Trendwest will agree to monitor selected water quality parameters at selected baseline measuring stations as identified in Paragraph 1.5.4.2, below. If this monitoring demonstrates a degradation of these parameters between the two (2) monitoring locations identified in Paragraph 1.5.4.2 resulting from MPR and UGA development and operation, Trendwest will take corrective action to comply with all standards in the Washington Water Quality Standards (WAC 173-201a).

1.5.4.2 Trendwest has collected baseline surface water quality data from a number of monitoring locations on-site as part of its MountainStar EIS analysis. Ecology selected the surface water quality parameters used in the MountainStar EIS analysis. Trendwest will continue collecting and analyzing data described in the MountainStar EIS at two (2) locations where baseline data was previously collected. Specifically, data collection shall continue at Cle Elum River mile 1 (located on the Cle Elum River just north of Interstate 90) and at Cle Elum River mile 7 (located near the City of Cle Elum's current diversion, where the Cle Elum River enters the Trendwest Property).

1.5.4.3 The data collection specified in Paragraph 1.5.4.2, above, shall continue on a quarterly (i.e. seasonal) basis for a twenty (20) year period beginning with the recording of the first final plat for the MPR. Trendwest will make this monitoring data and any baseline information available to the public.

1.5.5 Water Conservation. Trendwest Agrees to:

1.5.5.1 meet or, to the extent determined by Trendwest, exceed applicable federal, state and local water conservation guidelines;

1.5.5.2 install and maintain water meters for all individual residential units and develop and implement a leak detection program for the MPR;

1.5.5.3 undertake water audits every six (6) years (consistent with water system planning requirements) to determine overall MPR water usage and make results available to the Cities of Cle Elum and Roslyn, and the Town of South Cle Elum; and

1.5.5.4 landscape plans should include drought-tolerant plantings at all public facilities, including golf courses.

1.5.5.5 utilize computerized irrigation controls and high efficiency irrigation technology for golf courses as described in Trendwest's Golf Course Management Plan.

1.5.6 Big Creek.

1.5.6.1 Trendwest will provide funding for upstream passage improvements at the Big Creek diversion as outlined in the WDFW proposal for Big Creek in an amount of Sixty Thousand Dollars ($60,000.00); provided, however, that in lieu of a financial payment, Trendwest may substitute construction support as mutually agreed upon by Trendwest, RIDGE and WDFW. Upstream passage improvements include those intended to contribute to the restoration of fish runs in Big Creek. In the event these improvements cannot be pursued, the Parties may agree to substitute other identifiable measures to enhance tributary aquatic resources. Funds

H-02

and/or construction support will be disbursed as mutually agreed by the Parties and WDFW.

1.5.6.2 In consideration for RIDGE's waiver of appeal rights regarding future proposed water rights transfer applications, agreements or contracts as set forth in Paragraph 3.3.3.2, below, Trendwest will contribute Sixty Thousand Dollars ($60,000) for performance-based enhancements on Big Creek as outlined in the WDFW proposal for Big Creek; provided, however, that in lieu of a financial payment, Trendwest may substitute construction support as mutually agreed upon by Trendwest, RIDGE and WDFW. Performance-based enhancements are those intended to contribute to the restoration of fish runs in Big Creek. In the event these improvements cannot be pursued, the Parties may agree to substitute other identifiable measures to enhance tributary aquatic resources. Funds and/or construction support will be dispersed as mutually agreed by the Parties and WDFW.

1.6 Reduction of Vesting Provisions. Trendwest agrees as follows regarding the vested rights for Trendwest's development of the MPR and Trendwest's development of the UGA Property. These provisions, consistent with the provisions of Paragraph 2.0, below, shall be controlling in the event of any conflict with the Development Agreement for the MPR, or the development agreement to be adopted by Cle Elum for the UGA Property:

1.6.1 ***MPR.*** The Parties acknowledge that the MPR Development Agreement (Sections 4.1(a), (c) and (f)) between Trendwest and the County establishes vested rights for a period of thirty (30) years. Trendwest agrees to reduce the vesting period for the MPR from thirty (30) years to twenty (20) years for all of the Applicable Law (as defined in Section 4.1(c) of the Development Agreement), except for the County's Critical Areas Ordinance (Exhibit I to the Development Agreement). For the Critical Areas Ordinance, Trendwest agrees to reduce the vesting period from thirty (30) to fifteen (15) years.

1.6.2 ***Cle Elum UGA.*** The Parties acknowledge that Trendwest anticipates entering into a development agreement with the City of Cle Elum pursuant to RCW 36.70B.170 through -.210. The development agreement will relate to Trendwest Properties' proposed development of the UGA Property. Trendwest agrees not to request, support or accept a vesting provision that exceeds fifteen (15) years for any development agreement entered into with Cle Elum regarding the UGA Property. In the event the term of any development agreement with Cle Elum regarding the UGA Property is extended beyond fifteen (15) years, Trendwest agrees not to request, support or accept any vested rights in such an extension that are inconsistent with this Agreement.

1.6.3 Trendwest agrees not to request, support or accept any amendment to the following vesting and no-conflicting enactment provisions of the MPR Development Agreement that would expand Trendwest's Vested Rights under that Agreement: Section 4.1(a) (Vested Rights); Section 4.1(c) (Applicable Law); Section 4.1(f) (No Conflicting Enactments); provided, however, the Parties recognize that this

does not preclude Trendwest or the County applying statutes, rules or regulations adopted after the effective date of the MPR Development Agreement. Trendwest further agrees not to request, support or accept any amendments to the same or equivalent provisions included in the initial development agreement entered into with Cle Elum for the UGA.

1.7 Preservation of Off-Site Habitat and Open Space.

1.7.1 Trendwest will contribute One Hundred Fifty Thousand Dollars ($150,000.00) to a land conservation trust ("Conservation Trust") to be established by RIDGE (outlined in Paragraph 1.7.2, below). RIDGE and Trendwest will work together for the acquisition of lands, property interests, options or development rights (other than lands the City of Roslyn may seek to acquire in Section 17 of Township 20 North, Range 15 East, W.M.) to preserve in perpetuity forested lands adjacent to Roslyn and Cle Elum for open space and public recreation area, and to provide habitat connectivity between Easton Ridge, the Domerie Creek watershed, and the Teanaway watershed. The Conservation Trust retains authority to make final decisions on acquisitions taking into account the advice and recommendations of the advisory group as set forth in Paragraph 1.7.2, below.

1.7.2 An advisory group composed of RIDGE, Trendwest, other MCT participants, and the Cities of Cle Elum and Roslyn, subject to their agreement to participate, will advise and make recommendations to the Conservation Trust with respect to the acquisition of lands, property interests, options or development rights within the area described in Paragraph 1.7.2.1, below. The conceptual work plan for this advisory group shall include the following:

1.7.2.1 Prioritize lands for acquisition within the area shown on the map attached hereto as EXHIBIT I and incorporated by this reference. The advisory group shall consider the following factors, among others, in prioritizing potential acquisitions: biology, funders' priorities, and recreation/public access. Identify objectives and agenda towards potential acquisitions.

1.7.2.2 Identify funders and their protocols, structures, etc. Collect studies from different organizations. Conduct meetings with potential funders.

1.7.2.3 Formulate acquisition plan based on coordination of funders/supporters and Conservation Trust goals.

1.7.2.4 Raise funds, acquire lands/development rights.

1.7.3 Within sixty (60) days of the execution of this Agreement, RIDGE will establish the Conservation Trust, and Trendwest and RIDGE will begin work on formulation of the advisory group and the work plan outlined in Paragraph 1.7.2, above. Trendwest will contribute the above-specified $150,000.00 to the Conservation Trust organized by RIDGE upon the recording of the first final plat for the MPR or the UGA, whichever is sooner. The $150,000.00 contributed by Trendwest shall be used for

H-02

no purpose other than the acquisition of lands, property interests, options or development rights for lands within the area shown on EXHIBIT I.

1.7.4 In order to enable RIDGE to establish the Conservation Trust pursuant to this Paragraph, and to provide resources needed to arrange, plan, appraise and otherwise organize the purposes of the Conservation Trust, Trendwest agrees to make two contributions to the Conservation Trust each in the amount of Twenty Five Thousand Dollars ($25,000.00). The first of these contributions will be made within sixty (60) days of the execution of this Agreement, and the second contribution will be made on or before April 22, 2002. The Conservation Trust will provide Trendwest with a budget and final report of the planned expenditures (by category) for the initial contributions made pursuant to this Paragraph. In addition to these contributions, Trendwest may offer RIDGE in-kind support to facilitate establishment of the Conservation Trust.

1.8 Employment Practices and Standards. Trendwest agrees as follows with regard to employment practices and standards associated with development of the MPR and the Cle Elum UGA.

1.8.1 Trendwest will promulgate and enforce, and require its contractors and each tier of subcontractors to promulgate and enforce, a policy of non-discrimination concerning a potential employee or contractor's union status and/or RIDGE affiliation.

1.8.2 Trendwest will advertise and give written notice at libraries and post offices in Easton, Cle Elum, South Cle Elum, Ronald and Roslyn, and recruit locally (Kittitas County), to fill opportunities for contracting and employment, and will prefer local applicants provided they are qualified, available, and competitive in terms of pricing.

1.8.3 In the event that a group of Trendwest employees should seek union representation, Trendwest will not engage in "captive audience" meetings with employees concerning unionization, and will refrain from conducting "one-on-one" meetings with employees intended to pressure employees not to seek unionization.

1.8.4 Apprenticeship Opportunities and Coordination between Trendwest and the Cle Elum/Roslyn High School ("High School"). Trendwest will coordinate with the Cle Elum/Roslyn Vocational Program and the Washington State Apprenticeship Council ("WSAC") to integrate vocational opportunities throughout the construction and operation of the MPR and UGA into the programs, subject to the approval of the Cle Elum/Roslyn School District.

(a) The work plan of this program shall be integrated into the High School's "Pathways to Preparedness" program, and shall be an extension of this program's Industrial Occupations Path and the High School's "School to Work

Program" or similar programs mutually agreed upon by the Parties in the event the current programs are terminated.

(b) Students will have classroom time, supplied by the High School's staff.

(c) Classroom time on the model of "Running Start" college programs will be utilized in order to support the curriculum required for the WAC program.

(d) The "Community Resource Training Program" (credit for unpaid time spent "job shadowing") may be utilized to expose students in their junior year to a trade they are pursuing.

(e) The Diversified Occupations Release Program will be utilized to place students in paid positions offering on-the-job training for high school credit. Attached hereto as EXHIBIT E and incorporated by this reference is information summarizing the programs discussed in this Paragraph.

These programs shall be focused on the building trades and other occupations associated with MPR and UGA construction and operation.

1.8.5 Trendwest and its contractors will pay its construction and operation workers according to prevailing wage standards for Kittitas County as established by the Washington Department of Labor and Industries.

1.8.6 Trendwest will encourage its contractors and each tier of sub-contractors to provide health and welfare benefits. It is understood by the Parties that in some cases this action might not be feasible for small contractors with short-term employees. It is further understood by the Parties that employer contributions toward health and welfare benefits are included with wages or salaries to meet the prevailing wage standards.

1.8.7 Trendwest agrees to continue its practice of providing medical benefits to all Trendwest employees who work thirty (30) or more hours per week.

1.9 **Storm Water Management.** Trendwest agrees as follows with regard to storm water management for the MPR and the Cle Elum UGA.

1.9.1 ***MPR.*** Trendwest will comply with standards detailed in the Final Draft 2001 Washington Department of Ecology Storm Water Management Manual for Western Washington prepared by Ecology, or as it might be amended by Ecology for application in Eastern Washington ("Manual").

H-02

1.9.2 ***Cle Elum UGA.*** Trendwest agrees that its development in the Cle Elum UGA will be designed to urban standards as defined in the Manual defined in Paragraph 1.9.1, above.

1.9.3 Trendwest will obtain a National Pollutant Discharge Effluent Standard ("NPDES") permits for construction of all phases of the MPR and the UGA.

1.9.4 To provide protection for the Bullfrog Pond (depicted on the Binding Project Map) from potential storm water contamination, Trendwest agrees to construct a storm water treatment system using the "Stormfilter System"® or equivalent on the sections of the Bullfrog Road within the geomorphic flood plain east of the Cle Elum River.

1.10 **Protection of the Domerie Creek Watershed.** The Parties recognize the importance of protecting the Domerie Creek Watershed, which provides the sole water supply for the City of Roslyn. The Domerie Creek Watershed is depicted on the map attached hereto as EXHIBIT F, which is incorporated by this reference. Accordingly, Trendwest agrees to take the following steps in order to facilitate protection of the Domerie Creek Watershed:

1.10.1 Trendwest will retain the parts of the Domerie Creek Watershed (EXHIBIT F) located in Section 11, 14 and 15 of Township 20 North, Range 15 East, W.M. of the Trendwest Property in an undeveloped Natural Open Space state (as defined in EXHIBIT D), except for an access road (as shown on EXHIBIT C) and its bridge (over Domerie Creek). The related utility corridor and trail shall be located by mutual agreement of the Parties within the sections named in this Paragraph 1.10.1.

1.10.2 Except as provided in Paragraph 1.10.1, above, and except for roads required for emergency access and/or access easements providing other property owners access across the Trendwest Property, Trendwest will terminate existing trails and roads that access the Domerie Creek Watershed at the Trendwest Property line in Sections 11 and 15 of Township 20 North, Range 15 East, W.M.

1.10.3 Trendwest will conduct an on-going educational effort for MPR guests, residents and employees to inform them of the protection and no-use policies in the City of Roslyn's watershed, including posting signs as necessary.

1.10.4 Trendwest and RIDGE will work in partnership on efforts to enhance the quality of the habitat in the Domerie Creek Watershed; provided, however, any Trendwest expense in this regard shall be at the discretion of Trendwest.

1.11 Clarification of MPR and UGA Development Agreements Regarding Proof of Water Availability.

1.11.1 In the MPR and the UGA, the only building permits for buildings that require potable water that may be issued without proof of permanent potable water are for model homes, sales offices and construction offices. Certificates of water availability issued by purveyors subject to conditions shall not be deemed a lack of permanent potable water. These model homes, sales offices and construction offices shall not be occupied as residences until such time as they are connected to sewer systems and water supply systems. Consistent with Paragraph 2.0, below, Trendwest agrees to abide by this provision regardless of whether or not the County approves an amendment to Section 5.1(j) of the MPR Development Agreement, and regardless of whether or not Cle Elum incorporates language consistent with this Paragraph into any development agreement for the Cle Elum UGA.

1.11.2 Trendwest will not construct underground utilities or pave roads on the MPR or UGA in areas where water rights have not been transferred except for facilities associated with the Cle Elum water treatment plant, such as water supply and transmission lines and reservoirs.

1.12 Promotion of Historical Values of Roslyn. Trendwest will donate the sum of Three Hundred Thousand Dollars ($300,000.00) to a trust fund to promote the understanding and preservation of local history, including the influence of various cultures. This shall be done by funding projects including, but not limited to, the restoration of historic buildings and sites, the development of video and oral histories, the collection and preservation of artifacts and documents, the development of exhibits, and the coordination of efforts between entities dedicated to the afore-mentioned purposes. Two Hundred Thousand Dollars ($200,000.00) of this amount will be donated upon the recording of Trendwest's first final plat for the MPR. The remaining $100,00.00 will be donated in two Fifty Thousand Dollar ($50,000.00) payments to be made on the second and third anniversaries of the first recorded plat for the MPR. A four (4) member Board of Trustees shall administer this fund. Trendwest shall appoint two (2) Trustees, and RIDGE shall appoint two (2) Trustees. The Trustees will solicit proposals for projects to be undertaken in Upper Kittitas County and will fund those projects that meet with their approval. All of the actions of the Trustees must be approved by a majority of its members. All projects funded by this trust shall be in keeping with, and shall be historically accurate to, Upper Kittitas County before 1950. In the event that the Trustees have not allocated all of the $300,000.00 within four (4) years of its receipt of the first $200,000.00 donation, the unallocated balance inclusive of interest shall be donated to the Northern Kittitas County Historical Society ("NKCHS"). The NKCHS, if it should receive these funds, shall be required to use or allocate these funds for the purposes described at the beginning of this Paragraph. The NKCHS shall be required to allocate all funds within two (2) years of its receipt of the donation. If at this point any remaining funds have not been allocated, such funds shall be returned to Trendwest to be spent for the original intent.

1.13 Enhancement of Roslyn. Trendwest agrees to donate to the City of Roslyn the sum of Three Hundred Forty-Four Thousand Dollars ($344,000.00) at the rate of Eighty Six Thousand Dollars ($86,000.00) per year for four (4) years with the first payment to be made by Trendwest upon the first anniversary of the recording of the first final plat for the MPR. These funds shall be utilized by Roslyn for capital improvements. The improvements to be funded shall be selected by the City of Roslyn based on the results of a survey or poll of Roslyn citizens and business owners. Trendwest and RIDGE shall mutually determine the content and methodology for such a survey or poll, and the analysis and interpretation of the results. The cost of such polling or survey shall be borne by Trendwest and shall not be deducted from the $344,000.00 total.

1.14 Roslyn Cemetery Buffering. The Parties recognize that Trendwest owns certain real property located within the Roslyn corporate limits and immediately adjacent to the Roslyn cemetery in Section 17 of Township 20 North, Range 15 East, W.M. ("Trendwest's Section 17 Property"), but outside the boundaries of the MPR, which property is more particularly depicted in the aerial photograph attached hereto as EXHIBIT J and incorporated by reference. As soon as it should become available and prior to the conveyance of Trendwest's Section 17 Property, Trendwest shall provide RIDGE with the legal description of Trendwest's Section 17 Property. Upon the recording of the first final plat for the MPR, Trendwest agrees to donate Trendwest's Section 17 Property to the City of Roslyn in order to provide additional buffer between MPR development and the cemetery. Prior to conveying Trendwest's Section 17 Property to Roslyn, Trendwest shall execute a conservation easement(s) that precludes residential and commercial use of Trendwest's Section 17 Property. Upon conveyance to Roslyn, Trendwest's Section 17 Property shall be dedicated to provide open space and buffer and shall not be developed for residential or commercial uses; provided, however, that Parcel B of Trendwest's Section 17 Property, as shown on EXHIBIT J, immediately adjacent to the Roslyn Cemetery may be made available for future cemetery expansion twelve (12) years following the recording of the first final plat for the MPR. Trendwest agrees that it will not sell Trendwest's Section 17 Property to any buyer other than the City of Roslyn prior to the recording of the first final plat for the MPR. In the event the MPR Development Agreement and MPR Permit are terminated prior to the recording of the first final plat for the MPR, Trendwest will convey Trendwest's Section 17 Property to the City of Roslyn upon the recording of the first final plat for the UGA.

1.15 Construction and Operation Impacts. Trendwest agrees to the following in order to mitigate construction and operation impacts related to Trendwest's development of the MPR and the UGA Property:

1.15.1 Trendwest will prohibit the burning of debris from individual lot clearing by contractors and lot owners. This prohibition shall also apply to any maintenance activities on individual lots.

1.15.2 Land clearing debris shall be disposed of by the following methods, with priority given to non-burning methods:

H-02

(a) As determined by Trendwest, wood debris of appropriate size shall be made available as fire wood for use in common areas of the MPR and for appropriate off-site users.

(b) Chipping of land clearing debris for use as mulch for trails and landscaping on-site, and/or made available for off-site use.

(c) Haul of land clearing debris off-site for use as pulp, or other allowable use.

(d) Pile and abandon some of the forest residue to provide for wildlife habitat.

(e) Burning.

1.15.3 Trendwest shall use the International Dark Sky Association ("IDA") Zone EI standards for the MPR and UGA. The IDA Zone EI standards are recommended for "Areas with intrinsically dark landscapes. Examples are national parks, areas of outstanding natural beauty, areas surrounding major astronomical observatories, or residential areas where inhabitants have expressed a strong desire that all light trespass be strictly limited." Trendwest shall incorporate the standards described in this Paragraph 1.15.3 in its MPR and UGA Design Guidelines and/or Covenants, Conditions and Restrictions.

1.15.4 Construction work hours for the MPR and UGA construction shall be from 7:00 a.m. until 7:00 p.m. Monday through Saturday. Work on Sundays will be on an emergency basis only. Equipment servicing and maintenance times will be unrestricted.

1.15.5 A path shall be constructed by Trendwest in the Cle Elum UGA to connect the SR 903 trail to the Bullfrog Road Bridge.

1.15.6 Trendwest will include SR 903 west of Roslyn and before Horvat Road in the traffic monitoring plan for the MPR and UGA.

1.15.7 Except for emergency work, no person shall, on or within five hundred (500) feet of any noise-sensitive property, operate or cause to be operated any equipment used in construction, repair, alteration, excavation, grading or demolition work on buildings, structures, streets, alleys or appurtenances thereto:

(a) with sound-control devices less effective than those provided on the original equipment; and

(b) with noise levels exceeding:

H-02

(i) 80 dB during any calendar day for more than three (3) consecutive or non-consecutive calendar days in a three hundred sixty five (365) day period. Noise determination tests shall be for at least ten (10) minutes, with any four (4) tests in consecutive or non-consecutive clock hours above the 80 dB level constituting an exceedance for that day; or

(ii) 90 dB during any clock hour for more than four (4) consecutive or non-consecutive clock hours. Tests shall be for at least ten (10) minutes, with any single test above the 90 dB level constituting an exceedance for that hour; or

(c) A noise sensitive property shall mean any non-Trendwest Property outside the MPR. The location for sound level measurements shall be on any receiving noise-sensitive property outside the MPR, provided that each test is taken from the same property, and the provisions in this section shall apply to that specific test location.

1.16 Path from UGA to SR 903. Trendwest and RIDGE shall work with the Cities of Roslyn and Cle Elum, Kittitas County, and the Washington State Department of Transportation ("WSDOT") to create a non-motorized path along the SR 903 corridor from Roslyn to the Cle Elum/Roslyn schools and the future site of the proposed community center. RIDGE and Trendwest will begin this work as soon as this Agreement is executed by the Parties by jointly initiating a collective meeting of the above-mentioned parties.

1.17 Maintenance of Public Recreation Facilities. Trendwest agrees to engage in cooperative efforts with public agencies and others to assist in the maintenance of public recreation facilities in Upper Kittitas County. To facilitate those efforts, Trendwest will encourage MPR staff and guests to volunteer in the maintenance of public recreation facilities in Upper Kittitas County. This provision does not create a financial or staffing obligation by Trendwest unless agreed to by Trendwest.

1.18 Roslyn Cemeteries. Trendwest will not promote the Roslyn Cemeteries in its materials or communications. Trendwest will not operate bus tours to the Roslyn Cemeteries.

1.19 Public Access. Trendwest shall comply with MPR Permit Conditions of Approval C-12, B-31, B-32, B-34, B-40 and B-41 with regard to public access. All Cle Elum River access shall be offered on an equal basis to all Kittitas County residents, and MPR and UGA residents and guests. The Recreational User Statute (RCW 4.24.200, 4.24.210) shall apply to the use of all Cle Elum River access by any non-guest or non-resident of the MPR or UGA.

1.20 Golf Courses.

1.20.1 In the event Trendwest should propose golf courses other than the two (2) golf courses already sited in Phase 1 of the MPR, the Trendwest Golf Course Management Plan, with advisory input from RIDGE, shall be revised to incorporate best management practices for golf course management that minimize use of chemicals and emphasize water conservation.

1.20.2 Trendwest will use electric (instead of gas) carts on all MPR and Cle Elum UGA golf courses. Trendwest may allow golfers to walk or use pull carts.

1.21 Construction of Paragraph 1.0. The Parties recognized that a fundamental and material condition to RIDGE's willingness to execute this Agreement and make the commitments specified herein, including among other things the waiver of appeals rights as set forth in Paragraph 3.0, is Trendwest's commitments to the Obligations set forth in Paragraph 1.0 of this Agreement. Accordingly, Paragraph 1.0 (with the exception of Paragraph 1.4), particularly Paragraphs 1.1 and 1.3.7 (New Open Space and the Stream "C" Corridor), Paragraph 1.19 (Cle Elum River access), Paragraph 1.5 (Water Supply), and Paragraph 1.9 (Storm Water Management), shall be broadly construed to protect RIDGE.

2.0 Amendments to MPR Approvals to Reflect Trendwest's Obligations.

2.1 The Parties recognize that certain of Trendwest's Obligations set forth in Paragraph 1.0, above, warrant modifications to the MPR Development Agreement and/or MPR Permit as previously approved by the County. Trendwest's Obligations in Paragraph 1.0, above, that warrant such modification include, but are not necessarily limited to: Paragraph 1.1 (Reduction of MountainStar Footprint); Paragraph 1.2 (Reduction of MountainStar Units); Paragraph 1.3 (Binding Project Map for the MPR); Paragraph 1.6 (Reduction of Vesting Periods/Provisions); Paragraph 1.9 (Storm Water Management); Paragraph 1.11 (Clarification of MPR and UGA Development Agreements Regarding Proof of Water Availability); and Paragraph 1.15.3 (IDA Zone E1 standards). The Parties may mutually agree that other Trendwest Obligations also warrant modification to the Development Agreement and/or MPR Permit. At least one hundred twenty days (120) prior to submission of the first preliminary plat application for the MPR, Trendwest agrees to submit a request to the Kittitas County Board of County Commissioners ("BOCC") to modify the MPR Development Agreement and/or MPR Permit to reflect Trendwest's Obligations. The Parties acknowledge that the BOCC retains discretion whether to approve any amendments to the MPR Development Agreement and/or MPR Permit. The BOCC's failure to approve any amendments requested by Trendwest shall not constitute a breach of this Agreement by Trendwest. This Agreement shall remain in full force and effect if the BOCC declines to amend the MPR Development Agreement and/or MPR Permit to reflect certain Trendwest Obligations under this Agreement.

H-02

2.2 Trendwest will comply with the requirements of this Agreement regardless of the BOCC's response (or lack thereof) to Trendwest's request for a conforming amendment. Except as otherwise provided in Paragraph 2.3, below, Trendwest shall comply with the Trendwest Obligations under this Agreement regardless of different terms or provisions in the MPR Development Agreement and MPR Conditions of Approval.

2.3 In the event that Trendwest's compliance with the MPR Development Agreement or MPR Conditions of Approval would compel a breach of one or more of its Obligations under this Agreement, or compliance with this Agreement would compel a breach of the MPR Development Agreement and/or MPR Conditions of Approval, and the County refuses to amend the MPR Development Agreement to remove or modify the conflicting provision from the MPR Development Agreement or MPR Conditions of Approval, then Trendwest shall comply with the provision of the MPR Development Agreement or MPR Conditions of Approval and the conflicting provision in this Agreement will be deemed invalid and the provisions of Paragraph 17.0 (Severability/Non-Severability), below, will be applied for the purpose of developing a functionally equivalent obligation to substitute for the invalid provision.

3.0 Dismissal of Pending Litigation; RIDGE's Waiver of Appeal Rights; Protections from Third-Party Legal Challenges. The Parties agree as follows:

3.1 Definitions.

3.1.1 "Legal Challenge." A "Legal Challenge" shall generally include any administrative appeals or judicial actions challenging an agency permit or agency approval related to MountainStar and/or the Cle Elum UGA development, whether brought against Trendwest, the County, Cle Elum, a State agency, or other service providers (as defined in Paragraph 3.1.3, below), including, but not limited to: planning decisions related to the MPR and UGA, water rights, Infrastructure and Services Supporting the MPR and UGA (as defined in Paragraph 3.1.3, below), and Subsequent Actions for the MPR as that term is defined in Section 4.1(e) of the Development Agreement between Trendwest and Kittitas County. A "Legal Challenge" does not include: (i) an administrative appeal or judicial action challenging an agency action or agency permit approving a transfer by Trendwest of any of its water rights to a Third-Party for use outside the MPR or UGA; and (ii) an action to enforce the terms of this Agreement pursuant to Paragraph 5.4, below.

3.1.2 "Third-Party." A "Third-Party" hereunder shall mean any organization, group, entity or person, other than RIDGE, the RIDGE related parties listed in paragraph 3.5.1, Trendwest, an owner of a real property interest within the MPR or UGA, the owner and/or operator of any MPR or UGA facilities (e.g. hotels, golf courses or other on-site MPR recreational amenities), or the owner and/or operator of any business located within the MPR or UGA.

3.1.3 "Infrastructure and Services Supporting the MPR and UGA." The Parties acknowledge various governmental agencies and Puget Sound Energy are planning infrastructure projects in the Upper County and that such projects will, in part, support development in the MPR and UGA, and that other infrastructure and services are necessary for the MPR and UGA. The following projects, facilities and services shall be referenced herein as the "Infrastructure and Services Supporting the MPR and UGA": Cle Elum water treatment plant, including its related intake, storage and conveyance systems; waste water treatment plant ("Waste Water Treatment Plant"), including its related conveyance and outfall systems; County and state road improvements; County improvements to or expansions of the Solid Waste Transfer Station and services; expansion of the Roslyn-Cle Elum School District facilities and services; expansion of Puget Sound Energy's electrical substation and natural gas lines; fire, police, hospital and emergency services communications facilities and services; and cable, fiber optic lines, and other telecommunications facilities and services. Such projects, facilities and services shall be referenced herein as the "Infrastructure and Services Supporting the MPR and UGA."

3.2 **Dismissal of Pending Legal Challenges.**

3.2.1 The Parties recognize that appeals regarding the GMA Appeal have been filed by Trendwest and Kittitas County in Kittitas County Superior Court, and by RIDGE in Thurston County Superior Court, and that RIDGE has sought review of the LUPA Appeal by the Court of Appeals, Division 3. Within seven (7) days after the full execution of this Agreement by the Parties, the Parties agree to dismiss with prejudice their respective appeals in the GMA Appeal and the LUPA Appeal.

3.2.2 The Parties further agree to seek jointly to persuade Kittitas County to dismiss its GMA Appeal, but also agree that dismissal of the Kittitas County appeal is not fundamental or necessary for this Agreement or its implementation. The Parties agree that if the County GMA Appeal is not dismissed, any RIDGE participation in that GMA Appeal and related appeal proceedings (including future judicial appellate proceedings or administrative proceedings related to any GMA statement of compliance prepared by the County) shall not be considered a RIDGE Legal Challenge that is prohibited by this Paragraph; provided, however, this exception to prohibited Legal Challenges applies only to the extent the County GMA Appeal issues are limited, as presently, to "coordination" and "consistency" between the County and Roslyn under RCW 36.70A.100. Trendwest agrees to continue discussions with Roslyn notwithstanding the fact the County GMA Appeal alleges that no further County "coordination" with Roslyn is required by the GMA.

3.3 **Waiver of Future Appeal Rights.** RIDGE hereby agrees to waive its future appeal rights as follows:

3.3.1 *MPR.*

3.3.1.1 RIDGE agrees not to bring, or to aid or abet any Third-Party to bring, any Legal Challenge relating to the MPR. RIDGE's waiver of appeal rights relating to the MPR shall include (i) any Subsequent Action (as defined in Section 4.1(e) of the Development Agreement), regardless of whether such Subsequent Action was analyzed in the MPR EIS, (ii) the construction of one new bridge crossing across the Cle Elum River, and the use of the old Bullfrog Bridge (according to Paragraph 1.3.5 of this Agreement), (iii) a third golf course (subject to the terms of Paragraph 1.20, above), and (iv) any request to modify the Conceptual Master Plan approved by the County consistent with the processes for such modifications set forth in Section 5 of the MPR Development Agreement and consistent with this Agreement. Trendwest agrees that any Subsequent Action must be consistent with the terms and conditions set forth in this Agreement. Trendwest further agrees, as provided elsewhere herein, not to seek or accept any modifications or amendments to the MPR Development Agreement or MPR Permit and Conditions of Approval that are inconsistent with the terms and conditions of this Agreement. Any alleged breach of the Trendwest commitments contained in this Paragraph must be addressed by RIDGE through the dispute resolution process set forth in Paragraph 5.0, below.

3.3.1.2 In further consideration for RIDGE's agreement to waive Legal Challenges, and in conjunction with the dispute prevention provisions set forth in Paragraph 5.0 of this Agreement, Trendwest agrees to conduct regular meetings with RIDGE. Such meetings shall start within sixty (60) days from the execution of this Agreement and occur quarterly until RIDGE and Trendwest mutually agree to less frequent meetings, but at least once a year during construction. Either Party may call for a meeting with reasonable written notice. The purpose of these meetings is to establish an open and collaborative process by which Trendwest will solicit comments from RIDGE regarding Trendwest's upcoming applications for General Site Plans, Site Development Plans, subdivisions, Subsequent Actions, and/or requests to modify the Conceptual Master Plan before such applications are submitted to the County for approval. Trendwest will consult with RIDGE regarding issues raised in any RIDGE comments submitted on the proposed applications. This process is not intended to be exclusive; Trendwest and RIDGE may include others in this process by mutual consent.

3.3.2 *Cle Elum Urban Growth Area.*

3.3.2.1 RIDGE agrees not to bring, or to aid or abet any Third-Party to bring, any Legal Challenge relating to Trendwest's master plan for the UGA that is adopted by Cle Elum and related infrastructure and services as analyzed in the UGA EIS, including, without limitation, but only by way of example, any Legal Challenge related to: (i) the legal adequacy of the EIS presently being prepared by the City of Cle Elum pursuant to SEPA related to Trendwest's proposed master plan for the Cle Elum UGA (the "UGA EIS"); (ii) any decisions by the City to annex all or portions of the Trendwest Property within the Cle Elum UGA, and any decisions by the Kittitas County Boundary Review Board related to such annexations; and (iii) any approvals or

land use permits for development proposals in the Cle Elum UGA, including, but not limited to, any development agreement executed by and between Cle Elum and Trendwest, subdivisions (including preliminary and final approval), re-subdivisions, building permits, certificates of occupancy, lot line adjustments, shoreline substantial development permits, forest practice permit applications, development of the Washington State Horse Park, expansion of the Roslyn/Cle Elum School District facilities, establishment of the community center, and establishment of a business park.

3.3.2.2 While RIDGE is prohibited from filing Legal Challenges related to those projects identified in Paragraph 3.3.2.1, above, Trendwest agrees that RIDGE retains the right to appeal any new proposal in the UGA not analyzed in the UGA EIS.

3.3.2.3 Trendwest agrees not to request, support or accept any development agreement or conditions of approval with Cle Elum for the UGA Property, or any future amendment to such a development agreement, that is inconsistent with the terms and conditions of this Agreement.

3.3.2.4 Trendwest acknowledges that RIDGE believes the existing MPR and UGA EISs do not adequately analyze the Washington State Horse Park, community center, expansion of the Roslyn/Cle Elum School District Facilities, or Puget Sound Energy's expansion or construction of the electrical substation and natural gas line, and further acknowledges that those projects will require separate environmental review. Trendwest agrees to take no position as to whether the MPR and UGA EISs are legally adequate for those separate projects.

3.3.2.5 For developments proposed by Trendwest within the Cle Elum UGA, and in conjunction with the dispute prevention provisions set forth in Paragraph 5.0 of this Agreement, Trendwest agrees to conduct a meeting(s) with RIDGE prior to submission of any such development applications. The purpose of the meeting(s) is to establish an open and collaborative process by which Trendwest will solicit comments from RIDGE regarding Trendwest's upcoming applications for development in the Cle Elum UGA. Trendwest will consult with RIDGE regarding issues raised in any comments submitted on the proposed application(s). This process is not intended to be exclusive; Trendwest and RIDGE may include others in this process by mutual consent.

3.3.3 ***Trendwest Water Rights Actions.*** The Parties acknowledge that Trendwest has identified two water supply strategies for providing potable water to MountainStar: Change Applications submitted to Ecology and an exchange contract with Reclamation. Trendwest is presently pursuing the water supply strategy through the Change Applications with Ecology. The Parties further recognize that these water supply strategies are also intended to provide water supply necessary for the development of Trendwest's UGA Property. Trendwest may pursue other or additional water rights transfers, contracts or agreements to provide water for the MPR and UGA. Accordingly, the Parties agree as follows:

3.3.3.1 In consideration for Trendwest's Obligations set forth in Paragraph 1.0, above, RIDGE agrees not to bring, or to aid or abet any Third-Party to bring, any Legal Challenge related to decisions by Ecology on the pending Change Applications identified in EXHIBIT G and incorporated by this reference.

3.3.3.2 In consideration for Trendwest's Obligations set forth in Paragraphs 1.0, especially including Paragraph 1.5.6.2, above, RIDGE also agrees not to bring, or to aid or abet any Third-Party to bring, any Legal Challenge regarding those future water rights transfer applications, agreements or contracts by Trendwest with state, federal, local entities or others that are necessary to supply the MPR and UGA as defined in the water balance set forth in the relevant EIS (MPR and/or UGA) as modified by this Agreement regarding the reduced number of units in the MPR and golf course acreage in the UGA.

3.3.4 ***Infrastructure and Services Supporting the MPR and UGA.*** Without limiting the generality of the list of Infrastructure and Services Supporting the MPR and UGA set forth in Paragraph 3.1.3, above, but subject to the exception described immediately below, RIDGE agrees not to bring, or to aid or abet any Third-Party to bring, any Legal Challenge related to Infrastructure and Services Supporting the MPR and UGA. As an exception to this waiver, RIDGE retains the right to file a Legal Challenge related to any expansion of sewer service areas outside existing service areas (as of the date of execution of this Agreement), the MPR, and existing designated urban growth areas and nodes as of the date of execution of this Agreement (including the Cle Elum and Roslyn urban growth areas, and the Ronald urban growth node), and service areas established through the planning processes for the regional wastewater treatment plant; provided, however, this exception shall become effective only after the Waste Water Treatment Plant has been permitted and is processing wastewater from either the MPR or the UGA, provided that any such Legal Challenge does not prohibit service to the other project (MPR or UGA).

3.4 **RIDGE's Retained Appeal Rights.** Trendwest agrees that notwithstanding the foregoing waiver of appeal rights, and in addition to the exception related to future service areas for a regional wastewater treatment facility described in Paragraph 3.3.4, above, RIDGE retains the following appeal rights:

3.4.1 In the event the MPR Development Agreement and MPR Permit are terminated and the MPR Zoning remains in effect, RIDGE retains the right to appeal any decisions or approvals related to subsequent MPR proposals on the MPR Property;

3.4.2 In the event the MPR Development Agreement and MPR Permit are terminated, and the County re-designates in its comprehensive plan and/or rezones the MPR Property to any comprehensive plan or zoning designation that is more intense than the comprehensive plan or zoning designations in effect immediately prior to

the adoption of the MPR Approvals, RIDGE retains the right to appeal such more intense designations.

3.4.3 In the event the MPR Development Agreement and MPR Permit are terminated and the County re-designates in its comprehensive plan and/or rezones the MPR Property to any other designation, RIDGE retains the right to challenge decisions and approvals related to subsequent development proposals under those designations.

3.4.4 RIDGE retains the right to appeal new proposals in the Cle Elum UGA that were not analyzed in the UGA EIS, as set forth in Paragraph 3.3.2.2, above.

3.4.5 The Parties recognize that it is not possible at the time this Agreement is executed to foresee and identify all potential Legal Challenges that in the future may affect development of the MPR and UGA, the Infrastructure and Services Supporting the MPR and UGA, or compliance with the development agreements and conditions of approval for those developments. Therefore, prior to instituting any Legal Challenge RIDGE believes in good faith is not within the appeal rights waived pursuant to this Agreement, RIDGE will consult with Trendwest. RIDGE agrees to consider Trendwest's opinion but may nonetheless elect to file its Legal Challenge. In such event, Trendwest may (i) submit the issue of whether the RIDGE Legal Challenge is consistent with this Agreement to the dispute resolution provisions set forth in Paragraph 5.0, below, and/or (ii) seek immediate dismissal of the Legal Challenge by the body to which the Challenge was submitted if the administrative or judicial rules for such appeal would require Trendwest to seek dismissal before the dispute resolution process under Paragraph 5.0, below, might be completed. If it is determined that RIDGE's Legal Challenge was precluded by this Agreement, Trendwest retains all of its remedies provided herein. If it is determined that RIDGE's Legal Challenge was allowed by this Agreement, this Agreement shall remain in full force and effect.

3.5 Trendwest Remedies in the Event of a Prohibited Legal Challenge by RIDGE. The Parties agree that if RIDGE brings any Legal Challenge prohibited under this Agreement, Trendwest may enforce the terms of this Agreement and may rely on this Agreement to seek dismissal of such Legal Challenge. Trendwest may also seek injunctive or other appropriate equitable relief. Alternatively, Trendwest may terminate this Agreement. In either event, damages or restitution may not be sought or recovered. In the event of termination of this Agreement as a result of a RIDGE Legal Challenge, Trendwest shall be deemed released of all Obligations hereunder and, in the event the County has modified provisions of the MPR Development Agreement and/or MPR Approvals as a consequence hereof, Trendwest may seek restoration of its vested rights and Unit allowances as originally approved by the County, and may further seek restoration of any other rights modified by the County as a consequence of this Agreement. Trendwest agrees not to seek repayment for any monetary payments made pursuant to Paragraphs 1.7 (Preservation of Off-Site Habitat and Open Space), 1.12 (Promotion of Historical Values of Roslyn), and 1.13 (Enhancement of Roslyn) of this

H-02

Agreement in the event of a Legal Challenge by RIDGE that is prohibited by this Agreement. However, in the event of a RIDGE Legal Challenge prohibited by this Agreement, if Trendwest elects to terminate this Agreement, Trendwest's Obligations under this Agreement shall be null and void and Trendwest shall be entitled to re-conveyance of any New Open Space conveyed pursuant to Paragraph 1.1 of this Agreement, and Trendwest shall be entitled to seek full restoration of its rights as allowed under the MPR Development Agreement and MPR Permit. Further, in the event of any Legal Challenge by RIDGE prohibited by this Agreement, any recorded title memorandum, covenant, restriction or notice based on this Agreement shall be cancelled and removed from title through the sole request of Trendwest. In the event of a RIDGE Legal Challenge prohibited by this Agreement, Trendwest may also seek modifications to any development agreement with Cle Elum for the UGA that would have otherwise been in conflict with the terms and conditions of this Agreement.

3.5.1 A RIDGE Legal Challenge shall be any Legal Challenge brought by the corporate entity of RIDGE, any of its current Officers and Directors at the time of the filing of the appeal in their individual capacities, or any Legal Challenge brought from the date of the signing of this Agreement to a date twelve (12) years after the recording of the first final plat of the MPR by a person in his or her individual capacity who has served as a RIDGE negotiator of this Agreement, or as an Officer or Director of RIDGE, during that period. In the event of a Legal Challenge filed by any former Negotiator or Officer or Director in their individual capacities, Trendwest shall provide the then current Board of Directors of RIDGE with ninety (90) days written notice of its intent to terminate this Agreement during which time the RIDGE Board may seek dismissal of the Legal Challenge and Trendwest will support RIDGE's intervention in the Legal Challenge for the purpose of seeking dismissal of the Legal Challenge. Trendwest may not exercise its remedies under this Agreement until the end of the ninety (90) day period. Trendwest may exercise its remedies under this Agreement after the expiration of the ninety (90) day period if the RIDGE Legal Challenge has not been dismissed at the time Trendwest exercises its remedies. For purposes of this Paragraph, a RIDGE Negotiator is Douglas H. Kilgore, Ellie Belew, Larry Susich, and Edmund Januszkiewicz. Nothing in this Paragraph creates any individual liability on the part of the persons identified as the RIDGE Negotiating Team or any current or future officer(s) and director(s) of RIDGE. RIDGE retains the right to appeal as set forth in Paragraphs 3.2.2, (Kittitas County's existing GMA appeal) and 3.4 (RIDGE's Retained Appeal Rights).

3.5.2 If any Officer or Director of RIDGE, or anyone holding formal membership or affiliation in RIDGE files a prohibited Legal Challenge under this Agreement, the Board shall immediately terminate that Officer or Director from their position, and/or revoke any formal membership in and affiliation with RIDGE of anyone filing such Legal Challenge. RIDGE and Trendwest shall each annually provide to the other with a list of their respective Officers and Directors. The failure of either RIDGE or Trendwest to provide the corporate information identified in this Paragraph shall not constitute a breach of this Agreement.

3.6 Protections from Third-Party Appeals. The Parties recognize that they have mutual interests in avoiding any Third-Party Legal Challenges to the MPR or to the Cle Elum UGA, or to the Infrastructure and Services Supporting the MPR and UGA. In order to protect against Third-Party Legal Challenges, and to protect the mutual benefits to be derived by the Parties from this Agreement that would be jeopardized in the event of a Third-Party Legal Challenge, the Parties agree as follows.

3.6.1 In the event a Legal Challenge is brought by any Third-Party, Trendwest shall have the right at its sole discretion, but subject to the provisions of Paragraph 3.6.2, below, to terminate this Agreement, or some of its Obligations set forth in Paragraph 1.0, above, if Trendwest determines that the Third-Party Legal Challenge substantially impairs the ability of Trendwest to construct or sell all or portions of the MPR or UGA, including plats or phases within the MPR or UGA, or substantially impairs Trendwest's ability to operate all or portions of the MPR. As limited by Paragraph 3.6.3, below, with regard to the Phasing of Trendwest's Obligations for the MPR and UGA as set forth in EXHIBIT H, which is attached hereto and incorporated by reference, Trendwest may exercise its right to terminate this Agreement or some of the Trendwest Obligations by first providing RIDGE with written notice of termination.

3.6.1.1 To provide the Parties a reasonable opportunity to persuade the Third-Party to withdraw its Legal Challenge, or to obtain a dismissal or denial of the Legal Challenge, and subject to the exceptions set forth below, the right to terminate shall not be exercised by Trendwest for one hundred eighty (180) days after such notice.

(a) Provided, however, that for certain Third-Party Legal Challenges related to Trendwest's Water Rights Actions the right to terminate may only be exercised as follows: (i) for Third-Party Legal Challenges related to the Change Applications, the right to terminate shall not be exercised for a period of four hundred fifty five (455) days after notice from Trendwest following the filing of a Third-Party Legal Challenge from Ecology's decision regarding the Change Applications; (ii) for Third-Party Legal Challenges related to an Exchange Contract with Reclamation, the right to terminate shall not be exercised for a period of two (2) years following notice from Trendwest; and (iii) for Third-Party Legal Challenges related to any Trendwest Water Rights Action other than the Change Applications or Exchange Contract with Reclamation, including, but not limited to, applications for the temporary transfer of Trendwest water rights to Third-Parties, transfer applications other than the Change Applications identified in EXHIBIT G, or any other water right application, contract or agreement, the right to terminate shall not be exercised for four hundred fifty five (455) days following notice from Trendwest. The Parties expressly understand and agree that a Third-Party Legal Challenge filed by a downstream water user or any Reclamation water contract holder in the Yakima basin regarding the Change Applications or an Exchange Contract, or any Trendwest Water Rights Action other than the Change Applications or Exchange Contract with Reclamation, including, but not limited to, applications for the temporary transfer of Trendwest water rights to Third-Parties, transfer applications other

H-02

than the Change Applications identified in EXHIBIT G, or any other water right application, contract or agreement, shall not be deemed a Third-Party Legal Challenge that gives rise to Trendwest's right to terminate this Agreement or some of the Trendwest Obligations hereunder.

(b) Provided, further, that for certain Third-Party Legal Challenges that are to be heard in Federal Court the right to terminate may only be exercised by Trendwest for a period of two (2) years following notice from Trendwest.

The time periods contained in this Paragraph 3.6.1.1 shall be extended by an amount equal to any delays in the Legal Challenge stipulated to by Trendwest and accepted by the court or hearing body.

3.6.1.2 The Parties will attempt to persuade the Third-Party to withdraw its Legal Challenge, and Trendwest will expeditiously seek dismissal of the Legal Challenge and will not object to intervention by RIDGE on Trendwest's behalf in such proceeding. Trendwest may at its sole discretion agree to extend the period between giving notice and termination as set forth above if reasonable progress is being made to obtain the withdrawal, dismissal or denial of the Third-Party Legal Challenge. Subject to the provisions in Paragraphs 3.6.2 and 3.6.3, below, and the Phasing of Trendwest's Obligations identified in EXHIBIT H, if the Third-Party Legal Challenge is not withdrawn, dismissed or denied with finality within the time periods set forth above, or within the time period as extended by Trendwest, Trendwest may terminate this Agreement or some of the Trendwest Obligations as identified on the notice of termination, subject to Paragraphs 3.6.2 through 3.6.5, below.

3.6.2 Prior to exercising its right to terminate, and within the first sixty (60) days of the applicable time periods specified in Paragraph 3.6.1, above, Trendwest will, if requested by RIDGE, engage with RIDGE in mediation (but arbitration is not required) regarding the issue of whether and to what extent the Third-Party Legal Challenge substantially impairs the ability of Trendwest to construct or sell all or portions of the MPR or UGA, or substantially impairs Trendwest's ability to operate all or portions of the MPR, and the form, scope and timing of the Trendwest response to the Third-Party Legal Challenge. While the determination as to whether a Third-Party Legal Challenge substantially impairs Trendwest's ability to construct or sell all or portions of the MPR or UGA, or to operate all or portions of the MPR, as well as the decision to terminate this Agreement or some of the Trendwest Obligations, are within the sole discretion of Trendwest, Trendwest agrees to consider, prior to its decisions, the nature of the Third-Party Legal Challenge and its impact on the development of the MPR and/or the UGA, including but not limited to, the effect of the Legal Challenge on title, financing/lending, sales, permit processing, compliance with the MPR Conditions of Approval and any conditions of approval adopted by Cle Elum for the UGA, and provision of Infrastructure and Services Supporting the MPR and UGA. Subject to these considerations and as further limited below, Trendwest may choose, at its sole discretion, the form, sequence and timing of the termination of the Agreement or some of the Trendwest Obligations as deemed appropriate in light of the Third-Party Legal

Challenge. In the event Trendwest elects to terminate some of its Obligations under this Agreement in response to a Third-Party Legal Challenge and RIDGE believes that the Trendwest response is disproportionate to the impact of the Third-Party Legal Challenge on the development of the MPR or UGA, RIDGE may in its sole discretion terminate this Agreement. RIDGE's decision to terminate this Agreement would be subject to mediation as set forth in this Paragraph.

3.6.3 In the event Trendwest determines that the Third-Party Legal Challenge warrants termination of this Agreement relating to the MPR, or in the event of termination of this Agreement by RIDGE pursuant to Paragraph 3.6.2, above, only Trendwest's prospective Obligations, including prospective payments as scheduled in this Agreement, may be terminated consistent with the Phasing of Trendwest's Obligations set forth in EXHIBIT H. Following the sooner of the recording of the final plat for the last subdivision in any phase of the MPR, the recording of the first final plat in the succeeding phase, or the sale of seventy five percent (75%) of the Units in Phase 1, the Trendwest Obligations relating to that Phase shall not be revocable in the event of a Third-Party Legal Challenge. For purposes of this Agreement the following transactions shall be considered equivalent to the sale of a Unit: sale of lots, sale of parcels with an identified Unit count, issuance of occupancy permits, whichever should occur first. For example, conveyance of New Open Space, the Unit cap for Phase 1, and payments to the trusts and Roslyn associated with Phase 1 (as detailed above) may not be revoked due to a Third-Party Legal Challenge after the recording of the final plat for the last subdivision in Phase 1, or after seventy five percent (75%) of the Units in Phase 1 have been sold, whichever is sooner, but any or all such Obligations may be terminated for the remainder of the MPR development. The same limitation shall upon the sooner of recording of the final plat for the last subdivision or the sale of seventy five percent (75%) of the Units for Phases 2 and/or 3, respectively. In the event Trendwest records a first final plat for Phase 2 of the MPR before the final plat for the last subdivision in Phase 1 is recorded, Trendwest's Obligations tied to Phase 1 as identified in Exhibit H shall be irrevocable upon the sale of fifty percent (50%) of the Units in Phase 1. As discussed in Paragraph 3.5, above, financial payments made by Trendwest pursuant to Paragraphs 1.7 (Preservation of Off-Site Habitat and Open Space), 1.12 (Promotion of Historical Values of Roslyn), and 1.13 (Enhancement of Roslyn), above, made prior to a Third-Party Legal Challenge giving rise to termination of this Agreement shall not be revocable. The final plat in the UGA or any phase of the MPR shall for purposes of this Agreement be defined as the final plat recorded within that phase or the UGA which subdivides all or substantially all the remaining land subject to platting within that phase.

3.6.4 In the event Trendwest determines that the Third-Party Legal challenge warrants termination of some of Trendwest's Obligations relating to the MPR, Trendwest may only terminate prospective Obligations, including prospective payments as scheduled in this Agreement, consistent with the Phasing of Trendwest's Obligations set forth in EXHIBIT H (and in the manner generally described in Paragraph 3.6.3, above).

3.6.5 Trendwest agrees not to bring aid or abet, or to encourage, any Third-Party to bring a Legal Challenge regarding the MPR, the UGA, Trendwest Water Rights Actions, and Infrastructure and Services Supporting the MPR and UGA. In the event Trendwest terminates this Agreement as a result of a Third-Party Legal Challenge and it is determined that Trendwest aided or abetted the Third-Party Legal Challenge giving rise to termination, RIDGE may enforce the terms of this Agreement, and may seek injunctive relief or other appropriate equitable relief.

3.7 Construction of Paragraph 3.0. The Parties recognize that a fundamental and material condition to Trendwest's willingness to execute this Agreement and make the commitments specified herein, including among other things the reduction of Units for the MPR and the substantial financial contributions for property acquisitions and community improvements, is its ability to proceed with development of the MPR and the Cle Elum UGA without the threat of appeals or legal challenges from RIDGE or any Third-Party. Third-Party Legal Challenges could result in delays and increase the cost of development of the MPR and UGA to Trendwest thereby jeopardizing Trendwest's investment-backed expectations. Accordingly, this Paragraph and the definition of Legal Challenge shall be broadly construed to protect the MPR and the Cle Elum UGA, and Infrastructure and Services Supporting the MPR and UGA.

4.0 Termination. The Parties agree that this Agreement may be terminated in whole or in part only under, and subject to, the following circumstances and provisions:

4.1 This Agreement may be terminated in whole or in part by mutual agreement of the Parties.

4.2 This Agreement is terminated pursuant to Paragraph 3.0, above, as a result of a prohibited RIDGE Legal Challenge or a Third-Party Legal Challenge.

4.3 In the event the MPR Development Agreement and MPR Permit (which include the Conditions of Approval) are terminated, and any development agreement with Cle Elum, and development permits and conditions of approval for the UGA are terminated, this Agreement shall be deemed terminated. In the event of termination under this provision, the Phasing set forth in EXHIBIT H would apply and any Trendwest Obligations completed or due prior to the date of such termination would be irrevocable (e.g. open space conveyances and financial payments by Trendwest).

4.4 In the event the development agreement with Cle Elum, and any related development permit and conditions of approval for the UGA are terminated but Trendwest proceeds with development of the MPR, the provisions or portions of provisions of this Agreement relating to the UGA will be terminated but all other provisions of the Agreement will remain in full force and effect. The provisions of the Agreement related to the UGA that would be terminated include: Paragraph 1.1 (New Open Space within the Cle Elum UGA boundaries as shown on the Binding Project Map and as described in EXHIBIT H); Paragraph 1.5.3.2 (reduction of size of UGA golf

course); Paragraph 15.5.3 (water audits for UGA water usage); Paragraph 1.6.2 (reduction of vesting for UGA); Paragraph 1.9.2 (storm water management standards for UGA); Paragraph 1.11 (clarification of the UGA development agreement regarding proof of water availability for the UGA); Paragraph 1.15.3 (IDA Zone EI "dark sky" standards for UGA); Paragraph 1.15.4 (construction hours for UGA); and Paragraph 1.16 (Path from UGA to SR 903).

4.5 In the event the MPR Development Agreement and MPR Permit (which include the Conditions of Approval) are terminated, the provision of this Agreement related to the MPR shall be terminated but all other provisions or portions of provisions related to the UGA remain in full force and effect. The Trendwest Obligations for the UGA that would remain in full force and effect in such an event include those specifically listed in Paragraph 4.4, above, and those set forth on EXHIBIT H with regard to the UGA, which include the following provisions: Paragraph 1.7 (Preservation of Off-Site Habitat and Open Space); Paragraph 1.14 (Roslyn Cemetery Buffering); and Paragraph 1.15.5 (construction of path in Cle Elum UGA connecting SR 903 trail to the Bullfrog Road Bridge).

5.0 Dispute Prevention, Management and Resolution.

5.1 ***Dispute Prevention Meetings.*** Beginning before the first construction season for the MPR or UGA, Trendwest and RIDGE will meet quarterly, or at other mutually agreed upon times, to review and discuss the status of specific matters regarding the implementation of this Agreement. Such meetings are not intended to negotiate or re-negotiate the terms of this Agreement or any new items. In the event of then perceived, or forecasted, problems or disputes related to the terms and conditions of this Agreement, the Parties pledge to exercise all possible conciliatory efforts in cooperative problem solving activities consistent with the processes identified in this Paragraph.

5.2 ***Informal Dispute Resolution.*** In the event a Party, acting in good faith, believes the other Party has violated, or is preparing to violate, the terms of this Agreement, or in the event a Party identifies an unforeseen circumstance outside the control of the Parties that the Party in good faith believes directly and adversely affects the terms and conditions in this Agreement, the aggrieved Party shall give written notice detailing the alleged or anticipated breach or unforeseen circumstance outside the control of the Parties. Written notice shall be provided consistent with the provisions in Paragraph 9.0, below. This notice requirement is intended to invite and facilitate an informal resolution by the Parties of any dispute prior to the institution of litigation. The Parties agree to enter into collaborative negotiations and cooperative problem solving within four (4) days of the receipt of a Party's written notice. Each Party agrees to provide the other Party with that information necessary to determine whether or not there has been a violation of this Agreement. In the event the written notice relates to an alleged breach of this Agreement, the alleged offending Party shall have sixty (60) days from the receipt of the written notice in which to cure the alleged breach. The initial collaborative efforts to resolve alleged or anticipated breaches of, or to address

unforeseen circumstance outside the control of the Parties directly and adversely affecting, this Agreement shall be conducted at the lowest level(s) of the Parties' organization(s). If such initial efforts are unsuccessful, the Parties agree to expeditiously identify and arrange for person(s) at higher organizational levels with authority and knowledge to attempt to resolve the dispute expeditiously. It is the Parties intent that such collaborative efforts can and should be completed within thirty (30) days from the receipt of a written notice.

5.3 ***Formal Dispute Resolution.*** In the event that the informal collaborative negotiations set forth in Paragraph 5.2, above, are unsuccessful at resolving an alleged or anticipated breach of this Agreement or arriving at an agreeable response to an unforeseen circumstance outside the control of the Parties directly and adversely affecting this Agreement within thirty (30) days of receipt of a written notice, the Parties agree to meet and agree upon a formal dispute resolution process for attempting to expeditiously resolve any remaining dispute(s). The formal dispute resolution processes may include, but are not necessarily limited to, mediation, and binding arbitration; provided, however, that except as provided in Paragraph 17.0, below, neither Party can be required to enter into, or accept, binding arbitration. Where the Parties have agreed to submit a dispute to binding arbitration, the arbitrator's decision in such arbitration shall be final and binding on both Parties. The Parties will mutually select the potential mediators or arbitrators. It is understood and agreed that the only issues that may be addressed at such dispute resolution processes are those terms and conditions of this Agreement.

5.4 ***Legal Action to Enforce Agreement.*** Except as provided in this section, below, a lawsuit to enforce the terms of this Agreement shall not be filed until the later of (a) the end of the sixty (60) day cure period set forth in Paragraph 5.2, above, or (b) the conclusion of any formal dispute resolution process agreed to by the Parties pursuant to Paragraph 5.3, above, provided however the non-breaching Party shall have the right to immediately seek temporary or preliminary injunctive relief (but not permanent) to prohibit the alleged breach until the completion of the formal and informal dispute resolution processes.

Issues arising out of unforeseen circumstance outside the control of the Parties directly and adversely affecting this Agreement shall be subject to the informal and formal dispute resolution processes set forth above for which the Parties will actively and in good faith attempt to resolve. However, neither Party may commence a lawsuit regarding disputes arising from an unforeseen circumstance outside the control of the Parties and a Party's refusal to modify or amend this Agreement to account for such an unanticipated unforeseen circumstance outside the control of the Parties. A lawsuit may be commenced pursuant to this Paragraph only relating to alleged breaches of this Agreement that have not been resolved through the informal and formal dispute resolution processes called for in this Paragraph. Notwithstanding the above, however, nothing in this Agreement shall prohibit either Party from seeking injunctive relief as set forth in Paragraph 16.0.

5.5 ***Costs and Expenses.*** Each Party will be responsible for their own costs for attorneys and related expenses throughout the informal dispute resolution process set forth in Paragraph 5.2, above, any formal dispute resolution process agreed to by the Parties pursuant to Paragraph 5.3, above, and any subsequent litigation instituted consistent with Paragraph 5.4, above. However, the Parties will equally share the cost of any third-party mediator or arbitrator agreed upon pursuant to Paragraph 5.3, above.

6.0 **Attorneys' Fees.** In any proceedings brought by either Party to enforce this Agreement, each Party shall bear its own attorneys' fees and costs.

7.0 **No Admission of Liability.** This Agreement is intended to compromise and settle certain past, present and future claims between the Parties regarding the MPR, the Cle Elum UGA, Trendwest Water Rights Actions, and the Infrastructure and Services Supporting the MPR and UGA, and is not intended to be an admission by any Party as to any fact or legal principle, including those related to contentions made by the Parties in the GMA Appeal and the LUPA Appeal.

8.0 **Agreement Not an Endorsement of MountainStar by RIDGE.** Nothing in this Agreement constitutes an authorization for Trendwest to represent to any other person that RIDGE endorses any aspect of the MPR or the development of Trendwest's UGA Property; provided, however, that Trendwest is not prohibited from representing the fact that the Parties have entered into this Agreement to resolve certain past, present and future disputes regarding development of MountainStar, the Cle Elum UGA, Trendwest's Water Rights Actions, and the Infrastructure and Services Supporting the MPR and UGA. As provided in Paragraph 21.0, below, RIDGE retains all rights to express opinions, submit comments and otherwise advocate its position in administrative proceedings for permits and approvals relating to the MPR and the Cle Elum UGA.

9.0 **Notices.** Any notice or communication required by this Agreement between Trendwest and RIDGE must be in writing, and may be given either personally or by express delivery service, return receipt requested. If given by registered or certified mail, such notice or communication shall be deemed to have been given and received on the first to occur of (i) actual receipt by any of the addressees designated below as the party to whom notices are to be sent, or (ii) five (5) days after a registered or certified letter containing such notice, properly addressed, with postage prepaid, is deposited in the United States mail. If personally delivered or if delivery is made by express delivery service, a notice shall be deemed to have been given when delivered to the party to whom it is addressed. Any Party may at any time, by giving ten (10) days written notice to the other Party, designate any other address in substitution of the address to which such notice or communication shall be given. Such notices or communications shall be given to the Parties at their addresses set forth below:

If to Trendwest Resorts, Trendwest Investments, or Trendwest Properties:

c/o Trendwest Resorts, Inc.
109 S. First Street
P.O. Box 887
Roslyn, Washington 98941-0887
Attn: George Cockill
Telephone: (509) 649-3000
Facsimile: (509) 649-3059

With copies to:

Cairncross & Hempelmann, P.S.
Attn: John W. Hempelmann and
Brian L. Holtzclaw
524 Second Avenue
Suite 500
Seattle, Washington 98104-2323
Telephone: (206) 587-0700
Facsimile: (206) 587-2308

If to RIDGE:

RIDGE
PO Box 927
Roslyn, WA 98941

RIDGE Registered Agent
Douglas Kilgore
PO Box 622
Roslyn, WA 98941

RIDGE Contact Person
Edmund Januszkiewicz
PO Box 370
Roslyn, WA 98941
Telephone: (509) 649-2205

With copies to:

David Bricklin
Bricklin and Gendler
1424 Fourth St.
Suite 1015
Seattle, WA 98101
Telephone: (206) 621-8868
Facsimile: (206) 621-0512

10.0 **No Third-Party Beneficiaries.** This Agreement is for the benefit of the Parties hereto only and is not intended to benefit any other person or entity, and no person or entity not a signatory to this Agreement shall have any third-party beneficiary or other rights whatsoever under this Agreement. The Parties acknowledge that some benefits may be derived by the County, Cities of Cle Elum and Roslyn, and the citizens

of Upper Kittitas County, among others, from certain implementation of this Agreement. However, the Parties agree that the provisions of this Agreement do not create any third-party rights for persons or entities not signatories to this Agreement. No other person or entity not a Party to this Agreement may enforce the terms and provisions of this Agreement. RIDGE may, however, enforce the terms of this Agreement even where it is not the direct beneficiary of its terms, for example but not limited to with regard to payments to be made by Trendwest to third-parties.

11.0 Authority. The Parties each represent and warrant that they have full power and actual authority to enter into this Agreement and to carry out all actions required of them by this Agreement. All persons executing this Agreement in representative capacities represent and warrant that they have full power and authority to bind their respective corporations and/or partnerships and/or organizations.

12.0 Binding Effect. This Agreement shall be binding upon and inure to the benefit of the Parties and their, successors and assigns; provided, however, that purchasers of individual lots (except for purchasers for which a Transfer Agreement requiring consent of Kittitas County must be approved pursuant to Section 9.2 of the MPR Development Agreement), and such purchasers, and their title companies and lenders, successors and assigns, shall have no rights or obligations arising from this Agreement and the terms of this Agreement shall not "run with the land" upon transfers or assignments to such purchasers; provided, further, that Trendwest agrees to record a covenant separate from this Agreement that shall make the following Trendwest Obligations covenants that "run with the land" and therefore binding on all successors and assigns, including purchasers of individual lots: Paragraphs 1.15.1 and 1.15.2 (prohibition on burning of debris from individual lots).

13.0 Recording. Trendwest shall record a Memorandum of this Agreement with the Kittitas County Auditor within ten (10) days following its complete execution by the Parties. Such Memorandum of this Agreement shall make clear that the Agreement does not apply to purchasers of individual lots, or such purchasers' successors or their title companies or lenders, or the successors and assigns of such title companies or lenders.

14.0 Complete Agreement. This Agreement represents the entire agreement and understanding between the Parties, supersedes all prior agreements and understandings between the Parties and may be amended only by a writing duly executed by each Party hereto. Any person or entity acquiring all or a portion of Trendwest's rights, obligations and responsibilities under the MPR Development Agreement (including the MPR Approvals and Subsequent Actions) for which a Transfer Agreement requiring consent of Kittitas County must be approved pursuant to Section 9.2 of the MPR Development Agreement, shall be a necessary party to any amendment of this Agreement."

15.0 Governing Law. Any dispute between the Parties relating to this Agreement shall be governed by and construed in accordance with the laws of the state of Washington.

16.0 Enforceability. The Parties acknowledge that any willful and material breach of this Agreement will result in irreparable harm, and therefore, in addition to any other remedies that the Party would have, the non-breaching Party would be entitled to temporary, preliminary and permanent injunctions prohibiting the breaching Party from any such willful and material breach. The Parties agree that monetary damages from a breach of this Agreement would be difficult to ascertain and quantify and, therefore, specific performance is the proper remedy for any breach of this Agreement.

17.0 Severability/Non-Severability. The Parties view each and every provision of this Agreement as fundamental, material and necessary. If any provision is determined to be unlawful or unenforceable in any way or cannot be accomplished because of a mutual mistake of fact, impossibility, or other unforeseen circumstance outside the control of the Parties, the Parties will attempt to amend the Agreement to provide the functional equivalent of the Obligation that is unenforceable or which cannot be performed. If the Parties cannot reach agreement on a curative amendment, the matter will be submitted to the dispute resolution process set forth in Paragraph 5.0, above. Provided that if no resolution is arrived at by the parties using informal dispute resolution or mediation within one hundred twenty (120) days of written notice called for in Paragraph 5.2, then either Party may submit the matter to binding arbitration. Such binding arbitration shall utilize the following procedure. The Parties shall select an Arbitrator by mutual agreement. If a single arbitrator is not mutually selected the Parties shall request a list of five (5) available arbitrators from the Judicial Arbitration Mediation Service (JAMS) whereupon the Parties shall proceed to alternately strike one name from the list until only one name remains. That person shall be the Arbitrator selected. After selection of the Arbitrator, each Party shall submit one and only one proposed remedy. The Arbitrator shall select one (1) of the two (2) remedies proposed by the two Parties based on the Arbitrator's determination of the remedy which better provides the functional equivalent of the Trendwest Obligation which is unenforceable or which cannot be performed. If the provisions contained herein, specifically Paragraphs 3.0, above, through which RIDGE agrees that it will dismiss its current appeals and will not pursue or file certain future Legal Challenges, are determined to be unlawful or unenforceable in any way, those provisions will not be severed from this Agreement and this Agreement shall be null and void and no curative amendment shall be required, and any and all actions taken by the Parties to implement this Agreement shall be rescinded; provided, however, that if RIDGE elects to not file any such prohibited Legal Challenge, then despite a determination that the waiver of those appeal rights is unlawful or unenforceable, those provisions shall be deemed to be severed and this Agreement shall remain in full force and effect unless and until RIDGE files any such Legal Challenge.

18.0 Counterparts. This Agreement may not be signed in counterparts. Two (2) originals shall be executed, one each for RIDGE and Trendwest.

19.0 Headings Not Controlling. The paragraph headings included herein are included for reference only and are not a part of this Agreement. The headings shall not control or alter the meaning of this Agreement as set forth in the text.

20.0 Independent Legal Counsel. The Parties acknowledge that they have each entered into this Agreement after a full and complete opportunity to consult with and receive advice from their independent counsel as they deemed appropriate.

21.0 Public Participation. Consistent with Paragraph 8.0 (Agreement Not an Endorsement of MountainStar by RIDGE), above, the Parties agree that nothing in this Agreement shall be construed to limit the rights of RIDGE, and RIDGE formal and affiliated members, to make public comments, comment in public processes, contact and lobby public officials or otherwise make public statements. No such actions shall be considered "aiding and abetting" a Third-Party Legal Challenge wherever that phrase is used in this Agreement.

22.0 No Invalidation. Trendwest and RIDGE agree not to take any action to seek to invalidate or attempt to invalidate this Agreement, the Kittitas County Development Agreement and Conditions of Approval, the UGA Development Agreement, or UGA Conditions of Approval, provided, however, that Trendwest's termination of some or all of this Agreement pursuant to Paragraphs 3.0 and 4.0, and the exercise of RIDGE's appeal rights as set forth in Paragraphs 3.2.2 and 3.4, and RIDGE's right to terminate the entire Agreement as set forth in Paragraph 3.6.2, shall not constitute a breach of this Paragraph. Trendwest may seek or accept any modifications or amendments to the MPR and UGA Development Agreements and MPR and UGA Permits and Conditions of Approval consistent with the terms and conditions of this Settlement Agreement.

23.0 Equal Participation In Drafting. The Parties have participated, and had an equal opportunity to participate, in the drafting of this Agreement and the attached Exhibits. Any ambiguity shall not be construed against either Party based upon a claim that that Party drafted the ambiguous language.

IN WITNESS WHEREOF, this Agreement has been entered into by and between Trendwest and RIDGE as of the day and year first written above.

TRENDWEST RESORTS, INC., an Oregon corporation

By: William F. Peare
Its: President

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

On this day personally appeared before me William F. Peare, to me known to be President of Trendwest Resorts, Inc., the corporation that executed the within and foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

GIVEN under my hand and official seal this 19th day of September, 2001.

NANCY JO PIGG
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
MAY 1, 2004

Nancy Jo Pigg
(Print name of notary)
NOTARY PUBLIC in and for the State of Washington, residing at Tacoma
My commission expires May 1, 2004

TRENDWEST INVESTMENTS, INC., a Washington corporation

By: William F. Peare
Its: President

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

On this day personally appeared before me William F. Peare, to me known to be President of Trendwest Investments, Inc., the corporation that executed the within and foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

GIVEN under my hand and official seal this 19th day of September, 2001.

NANCY JO PIGG
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
MAY 1, 2004

Nancy Jo Pigg
(Print name of notary)
NOTARY PUBLIC in and for the State of Washington, residing at Tacoma
My commission expires May 1, 2004

TRENDWEST PROPERTIES, INC., a
Washington corporation

By: William F. Peare
Its: President

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

On this day personally appeared before me William F. Peare, to me known to be President of Trendwest Properties, Inc., the corporation that executed the within and foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

GIVEN under my hand and official seal this 19th day of September, 2001.

NANCY JO PIGG
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
MAY 1, 2004

Nancy Jo Pigg
(Print name of notary)
NOTARY PUBLIC in and for the State of Washington, residing at Tacoma
My commission expires May 1, 2004

MOUNTAINSTAR RESORT
RESOURCES, INC., a Washington
corporation,

By: William F. Peare
Its: President

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

On this day personally appeared before me William F. Peare, to me known to be President of Mountainstar Resort Resources, Inc., the corporation that executed the within and foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

GIVEN under my hand and official seal this 19th day of September, 2001.

NANCY JO PIGG
NOTARY PUBLIC
STATE OF WASHINGTON
COMMISSION EXPIRES
MAY 1, 2004

Nancy Jo Pigg
(Print name of notary)
NOTARY PUBLIC in and for the State of Washington, residing at Tacoma
My commission expires May 1, 2004

RIDGE, a Washington non-profit corporation

By: Douglas H. Kilgore
Its: Registered Agent

STATE OF WASHINGTON)
) ss.
COUNTY OF Kittitas)

On this day personally appeared before me Douglas H. Kilgore, to me known to be Registered Agent of RIDGE, the corporation that executed the within and foregoing instrument, and acknowledged the said instrument to be the free and voluntary act and deed of said corporation, for the uses and purposes therein mentioned, and on oath stated that he is authorized to execute said instrument and that the seal affixed, if any, is the corporate seal of said corporation.

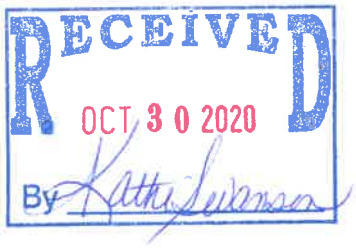
GIVEN under my hand and official seal this 22nd day of September, 2001.

Sandra L. Sutton
Sandra L. Sutton
(Print name of notary)
NOTARY PUBLIC in and for the State of Washington, residing at Roslyn
My commission expires 9-19-02

Letter L-64

SEPAResponsibleOfficial

From: Marc Kirkpatrick <marckirk@hotmail.com>
Sent: Friday, October 30, 2020 11:46 AM
To: Matthew Lundh; SEPAResponsibleOfficial
Subject: Proposed 47 North Project



Dear Councilman Lundh & SEPA Official,

Please accept this email as my public statement for this project during the SEIS comment process.

As a Cle Elum resident, business owner, Rotary Board member, and Cle Elum Downtown Board member, I would urge the City Council & Mayor demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

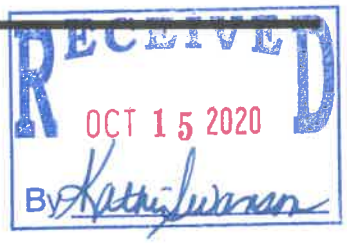
Thank you,

Marc Kirkpatrick
509-656-4176

Letter L-65

SEPAResponsibleOfficial

From: Rick Kurz <outlook_1BB10481D83FE4C1@outlook.com>
Sent: Thursday, October 15, 2020 1:28 PM
To: SEPAResponsibleOfficial
Subject: 2002 Bullfrog Flats Development Agreement



The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled 1

Sincerely,
Rick Kurz
561 Big Sky Vista Drive
Cle Elum, WA 98922

RECEIVED
OCT 26 2020
By wp 1:03

From:
Ronda Lovejoy
3330 Airport Rd.
Cle Elum, WA 98922

In regards to Claire Nicholls letter to the Editor in last Weeks paper, I totally agree with her opinion of what needs to be done. A community center for all ages is long overdue. 1

Thank-you
Ronda Lovejoy

Ronda Lovejoy
PO Box 313
Cle Elum, WA 98922

YAKIMA WA 989
PM
21 OCT
2020



Sepa Responsible Official
at City of Cle Elum
119 W. 1st Street
Cle Elum, WA.
98922

RECEIVED
OCT 26 2020
By lwp 1:03

H-02

RECEIVED
4:45 pm
OCT 15 2020
By Kathy Swanson

October 11, 2020

Attn: SEPA Responsible Official
City of Cle Elum
119 West First Street
Cle Elum, WA 98922

To Whom It May Concern:

It has come to our attention that back in 2002, a contract was made between the City of Cle Elum and Suncadia. In this contract Suncadia promised to give the City of Cle Elum twelve acres expressly for a community center for the residents of Upper Kittitas County. This contract included related amenities that I understand are valued by a third party at $5.8 million. While both the City and Suncadia agree this obligation exists, Suncadia has not yet made good on its promise and the City of Cle Elum has not seen fit to demand action on this promise.

This contract was made eighteen years ago. It is time for the city to demand that Suncadia fulfill its obligations. This demand should be made immediately, in good legal form, stating that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring twelve acres of land and $5.8 million, expressly for a community center for the residents of Upper Kittitas County, to the City of Cle Elum. All discussions regarding Bullfrog Flats must cease until this obligations if fulfilled. 1

This obligation is long overdue, and with the changes happening at Suncadia if we do not move on it now it may never happen. We know there is energy behind creating a community center in Cle Elum. With this land and the $5.8 million in hand, we are confident our community will at long last have a center for all of upper county to enjoy. Please do not delay in making this demand of Suncadia now!

Sincerely,

Kurt E. Lucke

Kurt E. Lucke

Claire A. Lucke

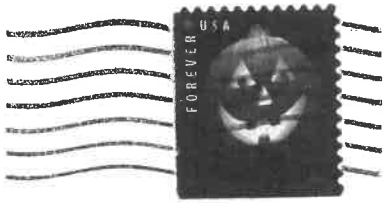
Claire A. Lucke

2580 Hidden Valley Road
Cle Elum, WA 98922
509-857-2580

H-02

Kurt & Claire Lucke
2580 Hidden Valley Road
Cle Elum, WA 98922

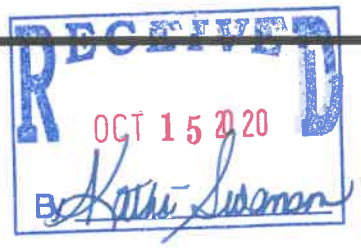
YAKIMA WA 989
PM
13 OCT
2020



RECEIVED
4:45 pm
OCT 15 2020
By Kathy Lubman

SEPA Responsible Official
City of Cle Elum
119 West First Street
Cle Elum, WA 98922

SEPAResponsibleOfficial



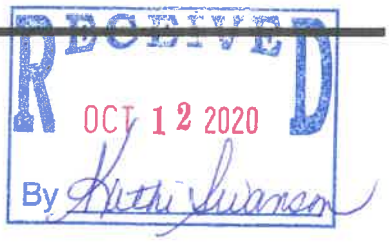
From: Sandy Malcolm <malcfam@gmail.com>
Sent: Thursday, October 15, 2020 11:41 AM
To: SEPAResponsibleOfficial
Subject: Bullfrog Flats

We implore the City of Cle Elum to step up and legally hold Suncadia responsible for fulfilling the terms of the 2002 Bullfrog Flats Development agreement to transfer 12 acres and 5.8 million dollars immediately to the City of Cle Elum for the promised Upper Kittitas County Community Center. 1

Regards,

Sandy and Doug Malcolm
Residents of Cle Elum

SEPAResponsibleOfficial



From: Chris Martin <chm.martin@gmail.com>
Sent: Monday, October 12, 2020 3:45 PM
To: SEPAResponsibleOfficial
Subject: 40 degrees north/Community Center

I am writing to request that the City of Cle Elum hold all action on any review/approvals of the 47 degrees north trailer park development until Suncadia meets its obligations under their original 2002 Bullfrog Flats development agreement to provide land and funding for a community center. 1

Chris Martin
PO Box 761
Roslyn, WA 98941
chm.martin@gmail.com
509-699-1163

SEPAResponsibleOfficial

From: Andrew McCaffrey <amccaffr@gmail.com>
Sent: Tuesday, October 20, 2020 10:06 AM
To: SEPAResponsibleOfficial
Subject: Citizen comment against Bullfrog Flats

RECEIVED
OCT 20 2020
BY

As a member of the Cle Elum and Roslyn community, I'm writing in against the development of bullfrog flats.

1) Any development, but especially one of this size will destroy habitat of animals, and pressure them to come into the areas that are already inhabited with people. We should not force animals to habituate with our development, but rather protect the areas not developed and further develop in areas already developed. 1
2) Instead of destroying parts of our woods, we should be creating incentives to further develop the cities, and protect the undeveloped areas. 2

Andrew McCaffrey

Letter L-71

SEPAResponsibleOfficial

From: Sharon Melbardis <sharon.melbardis@icloud.com>
Sent: Tuesday, October 27, 2020 4:55 PM
To: SEPAResponsibleOfficial
Subject: city of cle elum community center

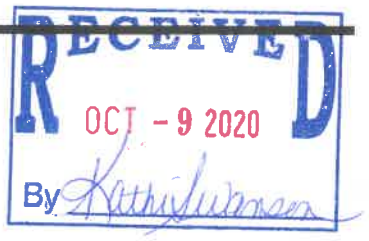


"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Sharon Melbardis
Cle Elum,WA resident
Sent from my iPhone

Letter L-72

SEPAResponsibleOfficial



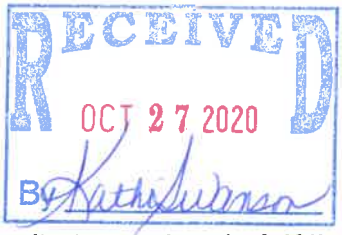
From: seth miller <sethjordanmiller@yahoo.com>
Sent: Friday, October 09, 2020 11:01 AM
To: SEPAResponsibleOfficial
Subject: Suncadia's promise

Hi my name is Seth Miller. I live off of exit 78. I am a business owner in the city of Cle Elum. I would like to see both the city and Suncadia act immediately on the community center as promised. I don't know was has been the hold up? Seems like more than enough time has already passed by. 1

Letter L-73

SEPAResponsibleOfficial

From: Rhonda Moe <rhondamoe490@gmail.com>
Sent: Tuesday, October 27, 2020 4:11 PM
To: SEPAResponsibleOfficial
Subject: UKC basketball club



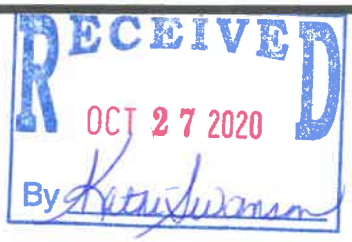
"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled."
If you could help us get this for our children that would be greatly appreciated. Thanks so much

1

Letter L-74

SEPAResponsibleOfficial

From: Theresa Ellison <telovedesign@gmail.com>
Sent: Tuesday, October 27, 2020 9:41 AM
To: SEPAResponsibleOfficial
Subject: Community Center

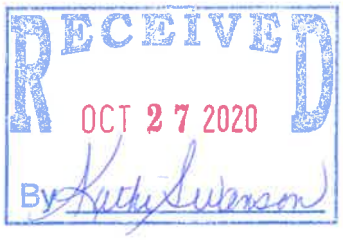


"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Claude Montgomery
Cle Elum High School Alumni and Lifetime resident

SEPAResponsibleOfficial

From: Personal <najarrandi@hotmail.com>
Sent: Tuesday, October 27, 2020 5:22 PM
To: SEPAResponsibleOfficial
Subject: 2002 Bullfrog Flats Development Agreement



Hi,

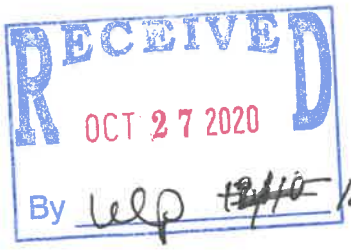
My name is Randi Najar. I live in Roslyn. I feel we are in desperate need for a community center for our area.

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Thank you for your time,

Randi

Letter L-76



City of Cle Elum

SEPA Responsible Official

The City of Cle Elum must immediately demand in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. 1

Bill and Sally Nelson

202 Reed Street

Cle Elum



Bill & Sally Nelson
202 Reed Street, Cle Elum, WA 98922

RECEIVED
OCT 27 2020
By

Sepa Official
City Cle Elum

Letter L-77

SEPAResponsibleOfficial

From: Pam Nelson <pnelson7@inlandnet.com>
Sent: Monday, October 19, 2020 11:19 AM
To: SEPAResponsibleOfficial
Subject: SEPA review of the Sun Communities/Suncadia land Sale

RECEIVED
OCT 19 2020
By Kathi Swanson

"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Thank you,

Joe and Pam Nelson

--

Pam Nelson
Payroll Administrator
Accounting Support

(509) 649-2211 phone
(509) 649-5240 direct
(509) 649-3487 direct fax

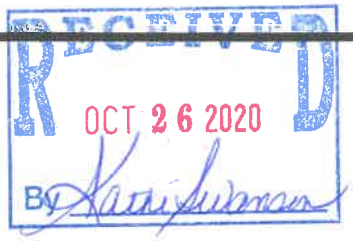
INLAND NETWORKS
Your Hometown Connection

P.O. Box 171
103 S. 2nd St.
Roslyn, WA 98941
www.inlandnetworks.com

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Letter L-78

SEPAResponsibleOfficial



From: Beau Nicholls <beaunicholls@gmail.com>
Sent: Monday, October 26, 2020 6:33 PM
To: SEPAResponsibleOfficial
Subject: Comments

To whom it may concern, City of Cle Elum must immediately demand in good legal form that Suncadia immediately fulfill its obligation under the 2002 bullfrog flats development agreement by transferring 12 acres of land and $5.8 million, expressly for a community center to the city of Cle Elum. 1

Beau Nicholls
3493 Airport Rd
Cle Elum WA, 98922

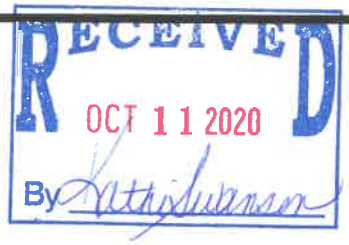
Sent from my iPad

Letter L-79

SEPAResponsibleOfficial

From: Claire Nicholls <clairenicholls@shoemakermfg.com>

Sent: Sunday, October 11, 2020 10:21 AM
To: SEPAResponsibleOfficial
Subject: 47 North / Sun Communities SEIS comments



The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 18 years is way too long – as elected officials that serve the citizens, it is your duty to make this happen now. 1

Claire Nicholls
Cle Elum

SHOEMAKER MANUFACTURING

Claire Nicholls | Vice President
clairenicholls@shoemakermfg.com
Shoemaker Manufacturing Company

Office: 509.852.3047 | Fax: 509.317.9534
618 E First Street Cle Elum, WA 98922
www.shoemakermfg.com

Read Our Vendor and Visitor Safety Protocols

*Aren't using the portal? Sign up online for a new **Customer Portal Account***

Letter L-80

SEPAResponsibleOfficial

From: Angelina Nicholson <angelina.c.nicholson@gmail.com>
Sent: Tuesday, October 27, 2020 9:24 PM
To: SEPAResponsibleOfficial
Subject: Suncadia Obligation

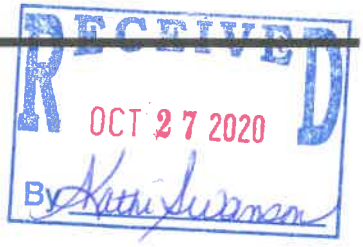


To Whom It May Concern:

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Angelina Nicholson
Cle Elum, WA

SEPAResponsibleOfficial



From: Tappy O'Cain <tappyocain@gmail.com>
Sent: Tuesday, October 27, 2020 9:55 AM
To: SEPAResponsibleOfficial
Subject: Suncadia Obligation

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Thank you,
Tappy O'Cain

RECEIVED
NOV - 2 2020
By Kathy Swanson

Comments on 47° North

Thank you for the opportunity to comment.

This proposal is quite different than the original proposal in 2002.

Sun Communities proposal of manufactured homes on rented lots and a large RV park is not something good for our area.

The life of a manufactured home is 35 to 55 years accord to The Federal Dept of Housing. The sample designs look cheap and roof's too flat for snow country.

Sun Communities Reputation of high cost to buy, ever increasing lot rents and poor maintence was easy to find on line. What will this look like in 100 years? Something CleElum is proud of?

This Document claims less impact because of less permant housing.

1

2

3

4

The number of units is the same. The clearing is the same The Employment is a lot less JOBs. Temporary JOBs during construction from 2025 to 600 and permanant JOBS from 1900 to 400. 50 Acres less of open space ~~than~~ the original proposal. 4 cont'd

This is not affordable housing But a predatory money making deal. There is less land for affordable housing 5

The project was always a traffic nightmare But the 625 RV site will Be a real nightmare of traffic Impacts. 6

72,368 metric tons of CO_2 By 2051 more than today. Explain That to your kids and grand kids why they don't get a future. NO realistic discussion of The Climate effects of Removing The Forest and Adding all That Additional CO_2. 7

NO discussion of the adverse effects of RV chemicals on the City's Activated sludge wastewater plant. 8

H-02

Regional Wastewater Plant

The capacity of the Regional Wastewater plant is not unlimite
TABLE 3.6-3 Residences + Populat
Cumulative Impact Projects.
Shows 5,509 Approved
units. Suncadia 4,400
units, City Heights 955,
Cle Elum Pines 154.
The 4th Amended Regional sewer
Agreement Exhibit 10
Allocates E.R.U.'s (Equivelent Residential
As Follows

MPR	3787
Bullfrog UGA	2206
Cle Elum	1184
Roslyn/Ronald	1050
s Cle Elum	355
	8582 TOTAL ERU's

Cle Elum was over their Allocated
ERU's in 2015. Cle Elum Pines and
City heights projects were not included
in The 4th Amended Regional Agreement
The developers did not pay for capacity
at the treatment plant. Suncadia paid
for the plant and each community was

8 cont'd

9

Supposed to charge ~~$~~ $3,900 per hookup capital reimBursement charge to pay back Suncadia. How many new connection's have been paid. When 40% of capital costs are paid then the comanunities don't need to collect it any more since Suncadia + (Bullfrog UGA) ~~[illegible]~~ are allocated 69.9 % of the hookups. This capital reimBursement charge was $3,900 when Roslyn hooked up in 2006. How much has been paid to Suncadia so far?

9 cont'd

In the past when questiones of CleElum being over allocation They have used the Bullfrog UGA unused hookups in their column to show They were not over and could keep adding new development. If those ERU's are now needed for the Bullfrog (47° North) where is the extra capacity coming from?

10

* The Regional plant Exceeded the Hydraulic Capacity in the 2009 flood & Climate change can cause further extreme weather Events. Capacity is a serious

11

issues as is abiding by the existing agreement between regional partners. What does the NPDES permit say?

The city heights EIS was really flawed when it came to wastewater treatment costs & charges and capacity. Please don't approve another flawed SEIS.

Is the horsepark connected to the city of Cle Elum sewer system? Will it be in the future? Does Suncadia measure it's wastewater flows to the regional plant? If not why not?

Capacity at the regional plant should not exceed agreement allo This issue needs to be resolved!

Increased traffic, noise, pollution fire danger, property taxes and lower quality of life were all impacts claimed by Roslyn whe the Resort was in the EIS process. The County EIS said the impacts on

11 cont'd

12

13

14

15

16

Roslyn would be insignificant and made up by increased sales tax revenue. NOW working people are displaced by wealthy buyers. NO PLACE for locals or their kids, unless you are selling real estate. still no affordable housing. still no real family income jobs. still no real plan for a sustainable future for people and familys who live and work here and who love this area.

16 cont'd

At the public hearing the county commissioners said they didn't favor impact fee's. Do you favor impact fee's for increased services for police, Emergency, Fire, schools, parks, health care systems? Don't transfer these costs to the public The developer should pay!

17

When considering these proposals you have the future of Upper County in your Hands. Think about where we are in 2020. Think about

18

H-02

The Climate AND The FUTURE
For your Kids AND grand kids.
THINK ABOUT our working
CLASS heritAGE + VALUES
Imagine A CLEAN + well planned
FUTURE NeighBorhood in DeELum
where your kids Could AFFord
A home on A Lot they owned.
A new developement with
SOLAR + WIND Power +
Everything within WALKING
distANCE to minimize
vehicle traffic. - Development
THAT utilizes Low Impact
techniques THAT minimize Forest
REMOVAL AND The creation OF
impervious SURFACES. The prosed
could provide AFFORDABLE housing
For LOCAL people who work here.
AFFordABLE housing WAS missing Fr
The Resort EIS AND is reduce
in This PLAN. In our community
AFFORDABLE housing has Been
ELiminated in A REAL ESTATE Frenzy
BASED on nothing. My own home WAS
increased in Assessment FROM $99,000 TO
$217,000 in 2 years.

18 cont'd

19

H-02

Consider the following

(1) A predatory real Estate scheme where Buyers purchase manufactured homes at high prices on a lot they never own is not Affordable housing Please don't Allow this to happen. 20

(2) Climate Impacts need to Be considered in a serious way. A giant RV park is also not what was intended in 2002. Future planning Assumes that we have A Future. If we continue like this plan your kids and grand kids will not have one. Ask them if climate change is real. 21

(3) "vested projects" like Cleelum pines have no capacity in the Regional sewer plant. city heights has no capacity in the Regional sewer plant. Do they have capacity in the water plant? Developers need to pay for treatment plant capacity up front. These costs 22

H-02

Are Being shifted to the ratepayers without their knowledge or consent.

(4) stop approving flawed Environment Assessments. City heights EIS was a bad plan. The wastewater analysis claimed the treatment costs for wastewater from over 800 homes at $8,000 annual. I wondered at the time why Roslyn Ronald were being charged over $100,000 per year for less homes. Now that plan is vested. The developer needs to pay for plant + infrastructure up front before construction starts.

(5) CleElum needs to abide by signed Regional Agreements when considering these projects Regional capacity as assigned By Exhibit 10 of the 4th Amended Regional Agreement. CleElum + S CleElum Exceeded their capacity in ERU's in 2015 or Befor

22 cont'd

23

24

Exhibit 10 ~~ERU's~~ RCE's		This document or ACTUAL
SUNCADIA	3787	4400
BULLFROG VGA	2206	0
CLEELUM	1184	1247
S CLEELUM	355	383
ROSLYN/RONALD	1050	787
	8582	
CITY HEIGHTS		955
CLEELUM PINES		154

HOW CAN SUNCADIA BUILD 4400 UNITS WITH 3787 TOTAL RCE'S? CLEELUM'S 2016 REPORTED RCE'S 1247 WHEN 1184 WAS ALLOTED AND NOW HAS "VESTED" 1109 MORE HOMES WITHOUT CAPACITY AT THE PLANT. THE DEVELOPERS OF CLE ELUM PINES + CITY HEIGHTS PAID NOTHING FOR TREATMENT PLANT CAPACITY. HOW DOES THIS WORK?

CURRENT ~~REPORTED~~ REPORTED RCE'S SHOULD BE INCLUDED IN THIS ANALYSIS OF CULUMATIVE IMPACTS.

CONSTRUCTION CONTINUES IN ALL THE COMMUNITIES WHILE PLANS IGNORE

25

26

27

The regional sewer Agreement The LACK OF CAPACITY FOR These "vested projects" AND The OVERRUN OF Allocated RCE's By CLE ELUM AND S CLE ELUM NEEDS TO BE RESOLVED. CLE ELUM CANNOT CONTINUE to IGNORE its RESPONSIBILITY AS OWNER/OPERATOR OF the Regional WASTEWATER PLANT. Revised ENGINEERING Reports ARE NOT SIGNED LEGAL Agreements. CLE ELUM HAS LEGAL AND MORAL OBLIGATIONS TO YOUR NEIGHBORS IN The LOCAL COMMUNITIES THAT SIGNED this Agreement. 27 cont'd

The BULLFROG UGA. 47° north proje AREA HAS 2206 HOOKUPS PAID FOR By SUNCADIA. The AREA will be developed. The other projects don't have HOOKUP CAPACITY AT the PLANT. 28

PLEASE don't approve this project with 30-50 year homes on rented lo ONLY Approved developments with A SUSTAINABLE FUTURE that provide AFFO housing for your kids & grandkids TO OWN 29

H-02

6) In 2020 Do we really want To construct 4,000's more homes in pine forest land along I 90 corridor - with wind + wildfire dangers growing each year from climate change.
Should we risk the lives of local firefighters To protect Thophy homes that should not have been built in that Environment?
What can Roslyn or Ronald residents do to prevent The Ever expanding UGA's and "vested projects" that urbanize the area that seperates our communities.

30

7) Imagine a future of 300 motorhomes going thru the roundabout on Bullfrog Rd and 903 at the same time. Imagine it on memorial day weekend with an event at the horsepark.
What are we thinking about here?
How many metric tons of CO_2

31

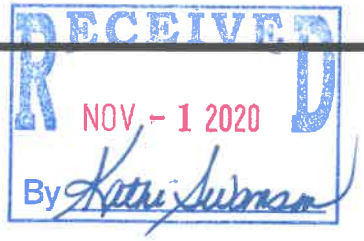
H-02

8 — Planning Decisions made almost 20 years ago had a major impact on our upper county communities. Please don't allow your decisions to be based solely on money. Do what is best for our future.

Joe Peck

Joe Peck
Box 1
Roslyn, WA. 98941

SEPAResponsibleOfficial



From: kristijrainwater@gmail.com
Sent: Sunday, November 01, 2020 8:57 PM
To: SEPAResponsibleOfficial
Subject: Bullfrog Flats Development Agreement

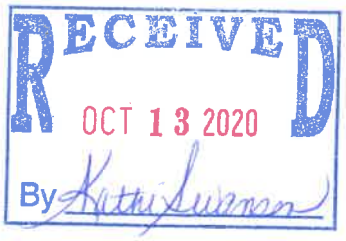
The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Kristi Rainwater
South Cle Elum

Sent from Mail for Windows 10

SEPAResponsibleOfficial

From: Jim Reed <jreedmd@msn.com>
Sent: Tuesday, October 13, 2020 7:02 PM
To: SEPAResponsibleOfficial
Subject: Community Center for Upper Kittitas County



Dear Cle Elum City Council,

It has come to my attention that a promise of land and money given to Cle Elum by Suncadia has not been fulfilled.

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

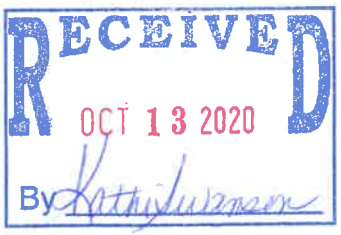
Please add this to your next meeting agenda and take action.

Sincerely,

James E. Reed, DDS, MD
3570 Summit View Rd.
Cle Elum, WA

SEPAResponsibleOfficial

From: Mike Reimer <cmreimer@hotmail.com>
Sent: Tuesday, October 13, 2020 3:17 PM
To: SEPAResponsibleOfficial
Subject: Community Center

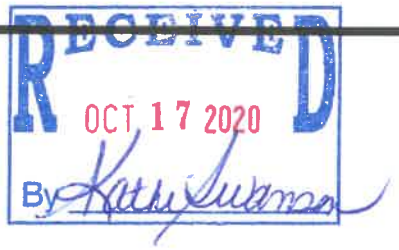


Dear Mayor, City Council and others of Concern:

It's time that the City of Cle Elum enforce a previous agreement between Suncadia and the City. Suncadia must fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats and associated development must cease until this obligation is fulfilled. Thansk for your consideration. 1

Mike Reimer, Property owner
Vistas at Cle Elum
253-606-9752 cell

SEPAResponsibleOfficial



From: annrisvold@aol.com
Sent: Saturday, October 17, 2020 4:50 PM
To: SEPAResponsibleOfficial
Subject: 47 Degrees North (Bullfrog Flats)

I have lived in the area only 3 years, but even so have heard a lot about the 12 acres and $5.8 million promised to the City of Cle Elum from Suncadia in 2002. My understanding is that Suncadia now is hedging on that promise by tying the land and money to the sale of Sun Communities.

It makes no sense to me that the City would allow Suncadia to renege on the deal made so long ago. Their pending sale seems completely unrelated to the promises made in 2002. 1

I would like to see the City bring an end to the stalling and insist that Suncadia fulfill its obligations immediately. Otherwise, if we lose out on this opportunity it's our own fault, which is inexcusable.

Thanks for your time.

- Ann Risvold
PO Box 37
South Cle Elum, WA 98943

SEPAResponsibleOfficial

From: Glenn Rudolph <glennrudolph46@gmail.com>
Sent: Monday, November 02, 2020 10:53 AM
To: SEPAResponsibleOfficial
Subject: bullfrog flats

RECEIVED
NOV - 2 2020
By Kathi Lubozo

To SEPA Responsible Official

I am a resident of Roslyn and I'm writing to express my concern about the impacts of the massive development planned at Bullfrog Flats. The project, which will double the size of Cle Elum, will also impact Roslyn and, in fact, is as close to downtown Roslyn as it is to downtown Cle Elum. 1

The developer, Sun Countries, is relying on a previously approved development proposal that differs significantly from their current one. The current Sun Countries project includes, in addition to a modular home community, a 600-space RV resort. This is substantially different from the previously approved conventional subdivision and should be considered separately from the modular home portion of the Sun Countries proposal. The RV resort is not a housing development—it is a private business. It will have impacts of a different nature than a housing development. I ask that the RV resort portion of this proposal be subject to a new and separate SEPA approval. 2

In proposing a project that will double the size of Cle Elum, the developer is subjecting our community to a wide array of impacts. We will need: more schools, more police, better roads, more firefighters, an expansion of our medical facilities, a larger garbage transfer station, and an assessment of our waste water treatment capacity. The developer does not address any of these issues—I assume that will fall on us, the taxpayers. I ask that the development be delayed until these problems have been studied and mitigated. 3

Our towns are subject to wildfire. The study linked here rates our area at HIGHER risk than the Camp Fire in Paradise, CA that took 85 lives and destroyed 19,000 buildings. https://www.azcentral.com/in-depth/news/local/arizona-wildfires/2019/07/22/wildfire-risks-more-than-500-spots-have-greater-hazard-than-paradise/1434502001/ And in addition to local residents, in the summertime we also have large concentrations of people in the campgrounds up the road from us. If there's a fire, how can we all leave? The area at Bullfrog Flats will be blocked by traffic from a development equal in size to Cle Elum itself. This is unacceptable. If the development proceeds, there must be accommodation made for new access and exit routes. 4

Please consider these objections and act accordingly.

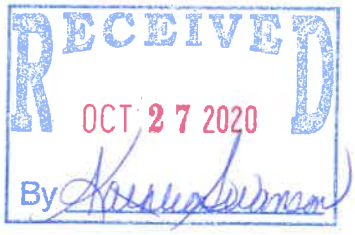
Thank you,

Glenn Rudolph
PO Box 601
Roslyn, WA 98941

Letter L-88

SEPAResponsibleOfficial

From: Michelle Santa <michelle@santainc.net>
Sent: Tuesday, October 27, 2020 3:56 PM
To: SEPAResponsibleOfficial
Subject: Bull Frog Flats Community Center

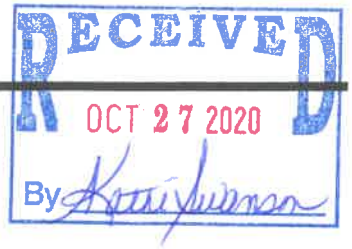


To whom it may concern:

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled 1

Michelle Santa
1091 Big Creek Road
Cle Elum, WA 98922

Letter L-89



SEPAResponsibleOfficial

From: Travis Santa <travis@santainc.net>
Sent: Tuesday, October 27, 2020 9:47 AM
To: SEPAResponsibleOfficial
Cc: ICE Michelle Santa
Subject: Require Suncadia Fulfill its Obligation to the City of Cle Elum

To whom it may concern:

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled 1

Travis Santa
1091 Big Creek Road
Cle Elum, WA 98922

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Letter L-90

SEPAResponsibleOfficial

From: Paul Schmitt <paulmschmitt@gmail.com>

Sent: Monday, October 12, 2020 9:37 AM
To: SEPAResponsibleOfficial
Subject: support a community center



The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Paul Schmitt
Roslyn

SEPAResponsibleOfficial

From: Lauren Segarra <laureneosegarra@gmail.com>
Sent: Friday, October 23, 2020 11:24 AM
To: SEPAResponsibleOfficial
Subject: 47 North proposed development comment



Hello,

I am a resident of Ronald, WA, and I am commenting in opposition to the 47 North development plan for the Bullfrog Rd area. Our small community is already so heavily impacted by outdoor tourism, it seems irresponsible to develop our beautiful open spaces with a 627-unit RV resort. Our town is already inundated by tourists during the summer and it has impacted locals' ability to enjoy the forests, rivers, wilderness, and natural areas that surround our beautiful home. Additionally, our upper county community's local resources are stretched to the breaking point with only having access to one grocery store (Safeway in Cle Elum), minimal hospital or healthcare access, and infrastructure that would not support an influx of community members. 1

The RV resort included in the plan is simply ridiculous and does not meet any needs of regular citizens of Upper Kittitas county. 2

Although housing is definitely scarce in Kittitas county, the minimal amount of affordable housing that is included in the 47 North plan would not accommodate the needs of regular citizens of the county. Incomes in our rural county are simply not high enough to afford the rising costs of housing which are being driven by wealthy folk purchasing second homes as vacation homes. 3

Please reconsider the development plan as it is not fit for the needs of Upper Kittitas county residents. 4

Thank you for your time!

Lauren Segarra

Ronald, WA
98940

Letter L-92

RECEIVED
OCT 14 2020
By

SEPAResponsibleOfficial

From: SANDY SHOVLAIN <sandrawic@msn.com>
Sent: Wednesday, October 14, 2020 1:49 PM
To: SEPAResponsibleOfficial
Subject: Fw: Comments on 47 north RV REsort Residences development off of Bullfrog Road

Hope this goes thru. See message below. SAndra Shovlain

From: SANDY SHOVLAIN
Sent: Wednesday, October 14, 2020 1:45 PM
To: SEPAResponsibleOf-ficial@cityofcleelum.com <SEPAResponsibleOf-ficial@cityofcleelum.com>
Subject: Comments on 47 north RV REsort Residences development off of Bullfrog Road

My name is Sandra Shovlain, I live at 123 Pacific Ave. W Ronald, WA.
I did put in comments months ago responding to the development along the Bullfrog road.
The response I saw from this committee was dated in 2000 which was responds used for the Suncadia development. 1
I thought that response was outdated 20 years ago. My question now is what has been done to get ready for this huge development?
I do see by the garbage dump looks like new dump is being built. Is this true?
Please update me on the services that are needed to take place to accommodate all new residents to the area. 2
Update me on 1. School (any new school being built?) 3
2. Store-- Safeway is only store in town to serve Ronald, Rosyln and Cle Elum. Is there going to be another store being built? 4
3. Medical office for more medical providers 5
4. Another Medical ER.
5. Additional support from police and fireman? 6
6. Infrastructure? Widen Bullfrog road to accommodate increase in population use. 7
Sincerely,
Sandra Shovlain at sandrawic@msn.com phone 253 377-9286

Letter L-93

SEPAResponsibleOfficial

RECEIVED
OCT 31 2020
By

From: Lauren Shuck <bingshuck@inlandnet.com>
Sent: Saturday, October 31, 2020 12:14 PM
To: SEPAResponsibleOfficial
Subject: 47 Degrees North SEIS

The proposed RV resort in both alternatives fails to adequately account for the impact of the RV population on our existing parks, trails and the Roslyn Urban Forest. 1

Many RVers will not confine themselves to the proposed recreational amenities found on resort grounds and will seek other venues throughout the upper county. 2

Many trail heads have inadequate parking for our existing population.Overflow parking creates traffic and environmental hazards which need to be addressed and mitigated. 3

Letter L-94

RECEIVED
NOV - 2 2020
By

SEPAResponsibleOfficial

From: Veronica Soderstrom <soderstromvj@gmail.com>
Sent: Monday, November 02, 2020 1:57 PM
To: SEPAResponsibleOfficial
Cc: A-ICE (husband Mark); Virginia Soderstrom; Krystyne Soderstrom
Subject: Comments for Bullfrog Flats

Dear Ms. Temple,

This email with comments on the Bullfrog Flats development and Sun Communities is respectfully submitted for consideration by myself, Veronica Soderstrom and on behalf of my family, Mark, Virginia, and Krystyne Soderstrom. We are all registered voters in Cle Elum, and Virginia is a small business owner. I would like to include and endorse the comments of Tom Uren at the end of this email as well. 1

As the last few months of our lives have shown us, the ability to work and go to school remotely has allowed for traveling while working. Our communities were inundated with visitors even when vacation rentals, hotels, and designated campgrounds were closed. No longer do we deal with "weekend" traffic. This extra stress on our roads, emergency services, cell and wireless connectivity, and grocery availability should serve as a warning of what's to come if we don't properly prepare for the inevitable development in and around Cle Elum. 2

Of considerable concern to me is the developer, Sun Communities. Before we decide to go forward with this development, the City should contact local governments where Sun Communities has already established roots. How did the development impact the existing community? Did the Developer follow through with improvements identified before getting approval? Is having a development of this sort actually a benefit? Were there significant changes to their crime, public health, emergency services, and traffic stats? Any negative impacts? Positive impacts? 3

Having manufactured homes and RVs at such a large scale in our remote and forested community scares me. I do hope that the City will require fire suppression systems in these homes as the County has required of new homes built within our forests. If we are to strive to be a Fire Wise community, that should include all new developments. What happened in Paradise, CA is the stuff of nightmares. We dodged a bullet during the Jolly Mountain Fire, and we know it. Will wood burning fires be permitted? Inside or outside? Natural gas already runs to Suncadia/Tumble Creek. The City could require the Developer to hook into that line to serve the development. 4

As our roads exist now, Hwy 903 and Bullfrog Road are the ONLY emergency evacuation routes for Roslyn, Ronald, Suncadia/Tumble Creek, Pine Loch Sun, and all the homes and campgrounds along Lake Cle Elum and that entire upper valley. Adding about 1300 new homesites to that already stressed road system could prove disastrous. I encourage the City to require the Developer to look at connecting to Cle Elum via Douglas Munro Blvd at minimum. The intersection of Douglas Munro Blvd and 1st Street with the I-90 ramp feeding onto 1st Street is already very busy, but the City could insist the Developer pay for improvements to include traffic signals. This would result in another safe route should an emergency befall our community. 5

The following are the words of Tom Uren, and I would like to have them again considered as the words of myself and my family:

In my opinion the SEIS is not adequate and needs to address the hard questions of cost and required public funding vs benefits. Here are my comments:

Ms. Temple,

Below are my comments on the 47 Degree North SEIS and Technical Reports. Please enter these into the record for the project.

General Comments on the proposal

The approximate population of the Cle Elum, Roslyn, South Cle Elum regional area per the SEIS is 3,350 people. The approximate population of the City of Cle Elum is 2,200 people. Proposed Alternate 5 would add 2,809 people, increasing the area population by 84%. Proposed Alternate 6 is somewhat smaller, but would still add 2,430 people (or equivalents), increasing the area population by 73%. Either alternative would more than double the size of the City of Cle Elum alone.

This near doubling of the population will have significant impacts across the board to local facilities and services, even services and facilities that are not normally considered in detail in typical SEIS's. Doubling of a population tends to do that. For instance, as just a few examples: the police department will need to double in size, the Cle Elum transfer station will be over capacity and weekend queue lengths will likely be seriously congested, the local school system will be 30%+ over capacity and in addition to many new teachers, the schools themselves will need to be expanded and/or the children housed in portables. Every public infrastructure system in the region that will be expected to provide services to the project, whether City, County or special district, needs to be examined in detail, expansions or mitigations needed to service the proposal need to be detailed and all of the costs to expand services (personnel) and facilities (capital costs) need to be tabulated so that the public is informed of the actual cost and where costs will be assigned. Currently the SEIS does not do this. If some costs are to be borne by the public, either from general revenue, bonds and/or increased taxes this should be disclosed, to determine if they are significant impacts. If all costs are not disclosed then the SEIS will be inadequate (as it is currently).

At the present time, based on what I've read in the SEIS the developer does not appear to be proposing to fund any of the required infrastructure expansions, with the exception of a relatively small partial contribution to traffic mitigations that will not adequately fund needed improvements. This means either the improvements will not be made and levels of service for all services in the region will drop, or costs of making the necessary infrastructure improvements will be borne by the public. Obviously an expansion of the City's tax base will increase revenues, and details are provided in the SEIS. The fiscal analysis describes a generally positive picture for the City of Cle Elum, that revenues will go up faster than costs and therefore the project will be a net benefit, at least to the city (the school district and other special districts however look to be net losers). However, the fiscal analysis is misleading because it includes only increased personnel and operating costs but does not include costs for capital improvements/facility expansions that are needed to support the near doubling of the population. This is a significant deficiency of the SEIS. If funding by the public is required to expand facilities to accommodate the proposal it needs to be disclosed.

General Comments on RV Resort

The proposed Alternative 6a 627 space RV Resort would be the largest RV park facility in the state of Washington (based on internet research). The local RV park in Ellensburg (85 units) that is used to develop some of the statistical parameters to evaluate impacts for the proposal is only roughly 10% the size of the proposed RV resort and is not close to the same type of facility in terms of design, amenities and programming. The RV Resort will likely be a major regional attractor. To put the RV facility in perspective, during the summer and peak periods it will likely have a population equal to or greater than the City of Roslyn. There is no data or analysis in the documents to show why it is reasonable to extrapolate statistics from a small local RV park to apply to a massive RV resort project. Other statistical elements of the RV resort

H-02

provided in the SEIS (for instance occupancy rates, trip generation, assuming 941 equivalent population for the RV Resort) appear to be back of the envelope estimates with no data to back up the assumptions. Given the size and impact for this facility, the SEIS and technical reports should provide statistics on similar size and scope RV resort projects to justify assumptions used in the analyses, trip generation, occupancy rates, police call generation, etc. Without some level of backup data to support assumptions the results of the RV Resort impact analysis must be considered suspect and inadequate.

Having the RV Resort analyzed accurately (and separately) is critical because of its size and impacts, but also because it is a private business. Because it is a private business, no public funds should be used to support it. If the current SEIS analyses understates impacts of the business and as a result public funds are needed to correct impacts (for instance for improvements to Bullfrog Rd project entrances or for increased police service) these public expenditures would be wholly inappropriate.

All impacts, and revenues, resulting from the RV Resort should be tabulated so that they can be viewed separately from the larger Alternative 6 proposal. While it can be construed that there might be some legal mandate to support adding residential housing on this site because of past approvals and to meet WA state GMA targets, there is no legal mandate to allow any specific type of private business, particularly one as large as the proposed RV resort. Therefore, the public, and the City, should be able to easily compare the prospective benefits and impacts from this business proposal to inform all decisions.

General Comments on Bullfrog Flats View Corridor

The Bullfrog Flats corridor, and its visual characteristics, is a critical cultural and recreational feature for the Upper Kittitas County region. The road is the gateway to upper valley recreation, camping and tourist activities. It's the first (and last) thing visitors experience when they exit I-90 and proceed up-valley. Its forested character contributes significantly to the "mountain" experience which supports regional recreation and tourism, which are important aspects of the upper valley economy. The importance of the Bullfrog Rd corridor has long been recognized, as evidenced by the 400 to 600 ft buffer provided by the Suncadia Resort when it was approved. If the look and feel of this corridor is significantly diminished, if it is transformed into an urban type experience, the character, and possibly the economy of the upper valley, will be significantly adversely affected.

The developer is proposing a 100 ft buffer along most of the Bullfrog Rd. Corridor. The SEIS states that all but one location abutting the RV Resort "Views of proposed development on the site (e.g., RV resort uses) would be completely blocked ..... by the density of the existing trees associated with the approximately 100-foot on-site forested buffer that would be retained along the perimeter of the site in this area". This is factually incorrect. Development on the site will not be completely blocked by a 100 ft buffer. Further discussion is provided in comments below. This is a significant adverse impact which can relatively easily be mitigated by the project by providing additional and appropriate buffer widths to obscure the development from view. On a site as large as this, sufficient area is available to do so without interfering with project objectives.

Comments on Public Services Section

For Alternative 5 (1,334 single family units, 2,809 new residents, commercial/industrial area) the SEIS shows that:

An additional 7 to 12 new police officers will be needed to serve the project (more than doubling of the current force). An Additional 3 full time professional fire fighters will be required. 6 new EMT's and 7 new paramedics will be neededThe local medical clinic will require an additional physician, 5 APC's and 6 RN'sFor Schools, this alternative would add 337 new students, which would exceed current school capacity by about 35% and require 23 new teachers and 6 to 7 new buses. As the school is essentially now at capacity, additional classrooms will be required. The SEIS should provide detail on how these additional students will be housed.

H-02

For Alternative 6 (707 units (SF and MF), 1,489 new residents, 600+ unit RV Resort, commercial area) the SEIS shows that:

An additional 6 to 8 new police officers will be needed to serve the project (doubling of the current force). An Additional 3 full time professional fire fighters will be required. 4 new EMT's and 5 new paramedics will be neededThe local medical clinic will require an additional physician, 5 APC's and 4 RN'sFor Schools, this alternative would add 177 new students, which would exceed current school capacity by about 20% and require 23 new teachers and 6 to 7 new buses. As the school is essentially now at capacity, additional classrooms will be required. The SEIS should provide detail on how these additional students will be housed.

For either alternative, the SEIS provides no actual detail on what improvements/expansions to facilities and equipment are needed to support the new officers, firefighters, EMT's, teachers, etc. that will be required by the project. The SEIS does recognize qualitatively that new facilities, classrooms, etc. will be required, but not in sufficient detail to estimate costs that can be included in the Fiscal Impacts and Economic Analysis. Costs for required public facility expansions (new police station, new classrooms, new fire fighting apparatus, etc.) could easily reach many tens of millions of dollars. From a land use process perspective at this point it may not be determined how exactly all of these costs will be funded, but they definitely need to be funded somehow and therefore they need to be included in the SEIS and Fiscal Analysis. This is a significant impact of the project and the absence of this information makes the SEIS fundamentally inadequate, preventing the public from seeing the full magnitude of project costs and impacts. Capital improvement and equipment costs need to be detailed, estimated and included.

Comments on Utilities Section 3,14

Solid Waste

the SEIS states "The Cle Elum Transfer Station is reported to be near capacity based on the number of cars queued at the station on Saturdays." Currently, other than this general statement the document contains no detailed analysis of impacts. This is inadequate because queue lengths at the Transfer Station are a direct impact to current residents and have a direct impact on the rate of illegal dumping on local roads. The SEIS should include a detailed analysis of the existing level of service (queue lengths) at the Transfer Station, the impact of the proposal on these queue lengths, measures to mitigate increases in queue length/capacity, who will pay for these mitigations and if they will be constructed concurrently with growth. Any costs to expand transfer facilities should be included in the fiscal analysis.

Sewer

The SEIS states "The City confirmed that the wastewater treatment demand is within the capacity of the City wastewater treatment plant, which was designed to accommodate the project," but no detailed data and tabulation of existing WWTP capacity, number of connections, residual capacity is provided. The City's WWTP serves Suncadia, Roslyn and Ronald in addition to the City's service area. By agreement these entities all have reserved capacity in the WWTP to serve their individual service areas, therefore there is wider interest in potential impacts to WWTP capacity than just within the city itself. A doubling of the City's population, and presumably a doubling of its flows to the WTP, is significant. A WWTP expansion, if it were ever needed to accommodate growth, would be extremely expensive. The City apparently has data that led it to conclude that sufficient capacity exists to serve the proposal. The SEIS should include this data.

Comments on Fiscal and Economic Analysis

The fiscal analysis does not include all of the costs needed to accommodate the proposal. It includes estimates of increased personnel and operating costs for the City and special purpose districts serving the area but does not include the cost of capital improvements/expansions/equipment needed to support the proposal. As examples (but not a complete list):

Per the SEIS between 10 and 15 intersections will need to be improved to meet level of service standards. The cost could easily reach $10 to $15 million (or more). The developer appears to be proposing funding a very small portion of this amount. If that is accurate, presumably the city/county will be required to fund the remainder, either from the general fund or via bonds (increased taxes). This is a significant cost which should be included so the public and decision makers can assess impacts.Per the SEIS school populations will increase by 20% to 30% exceeding the capacity of current school facilities. How will these new students (and the 12 to 23 new teachers) be housed? The SEIS provides no details. New schools or school expansions are very expensive (many millions of dollars, or tens of millions if new schools are required). This is a huge undisclosed impact. It appears the developer is not proposing to fund school expansion so presumably the public will need fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the school expansions or if a general tax increase is necessary.Per the SEIS the size of the police force will need to double. Facility improvements and equipment additions will likely be needed to accommodate a doubling of the police force, but no details or costs are included in the SEIS. It appears the developer is not proposing to fund police facility expansion so presumably the public will need to fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the police facility and equipment expansions or if a general tax increase is necessary.The SEIS Section 3.14 states that the Cle Elum transfer station is currently operating at capacity and the additional stream of solid waste (garbage) from Alt's 5 or 6 would exceed the current capacity requiring expansion of the facility. The cost of this expansion is not reported in the SEIS fiscal analysis. It appears the developer is not proposing to fund this expansion so presumably the public will need to fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the facility or if a general tax increase is necessary.

As this land use process progresses the City's responsible officials will determine what costs or improvements can be assigned to the project developer, which will be funded by the City's general fund, which will be funded by new bond issues (increased taxes), which will be funded by special purpose districts, etc. but unless all the capital facility and equipment costs are included and the bottom line cost accurately tabulated, the SEIS will not adequately disclose the true impacts and the public and city officials will not be adequately informed. The SEIS Fiscal analysis should include all costs required to serve the project.

Comments on TENW traffic report (Note: comments are provided on the transportation source document, but not specifically on the transportation section of the SEIS. However, all comments on the TENW traffic report should be construed to apply to the applicable sections of the SEIS proper)

General - The upper county is not a "typical" urban area. The economy, land use and traffic patterns of the upper county is primarily driven by recreational use and seasonal tourism. There are a number of statements in the Traffic report that imply that "standard" engineering assumptions for typical urban development are appropriate, and that busy weekend peak hours need not be mitigated because they are so short. Heavy seasonal and weekend recreational use IS the normal for the upper county against which impacts of the proposed project should be measured. I believe that the traffic impacts for weekday periods is somewhat overstated and that impacts during peak summer weekend periods are significantly understated. To the extent that the traffic analysis, and subsequent mitigation assumptions, are based on trip generation/distribution from "typical" urban areas that are non recreational/tourist oriented, they must be revised to focus on actual area patterns.

Page 5, paragraph 2: The report states "it is not standard traffic engineering practice to mitigate for traffic conditions that only occur for a few hours a week during the summer months". I don't believe this to be true, there are no specific engineering standards for mitigation. Requirements for mitigation vary by jurisdiction. The City of Cle Elum may (or may not) decide to mitigate specific project impacts after viewing the data. Regarding mitigation for short period impacts, if there was a standard or code as cited, then no stadium project, event, or other short but significant project would ever be required to mitigate its impacts. The report should remove references to engineering standards for mitigation.

Section 2.5 (1st paragraph) and Fehr memorandum (page 2) states the Kittitas County model was calibrated with 2019 weekday PM traffic counts, but the traffic counts, locations, dates and times gathered, do not appear to have been provided in the report. This information should be included for public review, as it is not possible to assess the validity of model predictions without this information. It is well known locally that there are intersections in the study area that currently operate at LOS F during peak summer periods when I-90 is at capacity. This does not appear to be reflected in the study as an existing baseline condition.

Section 2.5 (1st paragraph) states that traffic counts at intersections 21 - 24 were collected in December and then increased by 64 percent using WSDOT guidelines to estimate peak summer conditions. This is not accurate and significantly understates existing summer peak period traffic. Intersection 21 (Roslyn - Pennsylvania and 903) currently operates at LOS F during peak summer periods, not LOS C as shown. Current wait times significantly exceed the 17 to 20 sec stated in the report and so the impacts of the proposal in future years are understated. At peak times the traveling public uses local side streets to bypass congestion on 903 through Roslyn, causing impacts to Roslyn residents. The additional traffic from the proposed development will significantly worsen the situation. The SEIS consultant team should meet with City of Roslyn staff to verify existing conditions and update the models to accurately reflect existing conditions and accurately report project impacts.

Section 2.5 (1st paragraph) traffic counts at intersections 21 - 24: The upper county/Roslyn has numerous festivals, events and iconic businesses during the peak summer season that are major attractors that significantly affect traffic patterns, trip generation and parking needs during peak periods. These events have been going on for many years, some for decades, and are effectively part of the baseline. Surely the proposed development will similarly be attracted to these events and downtown Roslyn. The trip distribution in the SEIS does not appear to include this attractiveness, and the trip distribution to Roslyn during peak periods seems very understated. The SEIS consultant team should meet with City of Roslyn staff to verify existing model distributions and update to accurately reflect existing conditions and accurately report project impacts.

Section 2.5 Future 'Baseline' Traffic Volumes - The I-90 Snoqualmie Pass East widening project appears to be inducing more traffic and growth in the Upper County area (both permanent residents and recreational use), and with the next phase to Easton underway this is likely to accelerate. Do the traffic growth assumptions include this induced growth as baseline? What magnitude was assumed?

Section 2.6 Existing Intersection LOS, Table 7 - As noted above the LOS at intersection 21 is not LOS B. It frequently operates at LOS F during peak summer periods.

Section 2.6, Page 25 last paragraph - The report states "it is not standard traffic engineering practice to mitigate for traffic conditions that only occur for a few hours a week during the summer months". See comment above, this statement should be removed from the report.

Pages 28 & 29, Future baseline conditions - Intersection 21 currently operates at LOS F. Report should be revised accordingly

Sections 3.4 & 3.17, Trip GenerationFor both Alternatives 5 and 6 it appears that trip generation for the residential portion assumes typical Urban type development trip generation patterns where peak trips are to and from employment centers during PM peak hours. However, upper county does not follow typical Urban Development patterns as noted above. It is likely that either Alts 5 or 6 will contain significant amounts of "2nd houses" for weekend use and rental (unless prohibited by deed restriction). This weekend use pattern will drive up the trip generation to and from the site during the Friday and Sunday peak periods and so the analysis as currently completed may well understate the impacts of the proposal during these periods. The analysis should be revised accordingly.

For Alternative 6 RV resort see General Comments on RV Resort above. The parameters and statistics used to assess RV Resort impacts are based on much smaller RV parks. Additional data based on facilities of similar type and size should be provided to verify model assumptions.

For Alternative 6 RV resort, what is the basis for trip generation? I could not find a separate trip generation table for the RV resort in the report and it appears that weekend trips to the resort by RVs are understated. Unless specific studies are provided to the contrary, it would seem logical to assume that many, if not most, RV sites will turn over on weekends, significantly driving up the trips and impacts.

Before a new supermarket is built in the proposed commercial center (2031), the only full service supermarket in the upper county is Safeway at W 1st st and Douglas Munro Blvd. Being the only supermarket, it is a major traffic attractor and its "attractiveness" could be understated by standard ITE criteria. The effect is magnified by the recreational use patterns as many weekend visitors stop at the Safeway before continuing, to their ultimate destinations, particularly on Friday afternoon/evenings. Has this clearly known effect been included in the models? If the traffic analysis assumes that a supermarket in the commercial area will reduce offsite impacts then there should be a specific timeline and commitment by the developer to have the new supermarket constructed at a specific date. If the timing of a new supermarket will be allowed to be driven by market conditions, then the study should provide clear justification for any timing that is assumed.

Sections 3.2, 3.3, 3.14 & 3.15, Roadway Network, Site Access and CirculationWhile the site is located in the City's urban growth area, it is essentially "disconnected" from the City proper. The SEIS should study the possibility of extending a new arterial road from the residential portion of the site directly to Douglas Munro Blvd. to provide direct connectivity to the City's primary Urban Area, businesses, services, a second access to I-90 as well as access to the future low cost housing site (which currently has no access point shown on the site plan). It would also reduce impacts to Roslyn, Ronald and other residences along 903.

Sections 3.6, 3.7, Future Intersection Volumes / LOS - The impacts at Intersection 21 (903 and Pennsylvania in Roslyn) are understated - see above

Table 23, Page 57, Site Access LOS Summary - Table 23 shows that every project entrance will fail during summer peak periods. Bullfrog Rd and 903 are critical ingress/egress roads for the region, for both residents and weekend visitors that come and go from I-90 to up valley areas. It is the "Front Door" to up valley areas. The traffic report should detail what these LOS failures actually mean for the traveling public headed up valley but not going to the project, what level of congestion, length of queues and delays on the main road, etc, To the extent that new congestion on Bullfrog and 903 caused by the project makes it more difficult to proceed up valley this will result in significant impacts and should be disclosed (and mitigated). Congestion that degrades the experience of weekenders headed up valley WILL impact up valley towns and businesses.

Section 3.8 & 3.19 - Have WSDOT or Kittitas county been consulted about replacing stop controlled intersections on SR 903 and Bullfrog Rd with roundabouts to match existing facilities that abut the project? Current WSDOT guidelines generally show a preference for roundabouts at all new access points of major developments. Roundabouts at site access points should be included in the study.

H-02

Section 4 - Mitigation Measures - Impacts, and mitigations, for all weekend peak periods should be included (see above).

Contribution of funds based on the project's calculated proportional share of impacts is not adequate, or effective, mitigation unless the contribution is made to an actual Public Capital improvement project that is scheduled for construction prior to or concurrent with the timing of the impact (concurrency). Partial funding that does not result in road or intersection projects being caused to be built does not mitigate project impacts. To mitigate project impacts in fact and maintain a reasonable concurrency four options are available:

1. The project is responsible to construct the improvements necessary to maintain adequate levels of service on affected roads as the development is built out;
2. The project can partner with other developers or municipalities to construct necessary improvements in a timely way;
3. The project can wait until necessary improvements are constructed by others and road capacity actually exists to proceed;
4. If an affected jurisdiction has a Capital Improvement Plan that includes construction of necessary improvements, the project can contribute to it (and accelerate needed elements) so that improvements are concurrent with impacts. Note that any solution that includes the expenditure of public funds to construct improvements needed for the development to proceed and require new taxes to do so, constitutes a financial impact on the public that must be analyzed and disclosed in the SEIS.

The impacts to Intersection 21 (903 and Pennsylvania in Roslyn) are understated and mitigation by the project should be required. The developer and City should meet with the City of Roslyn officials to work out acceptable mitigation.

The project should be required to extend an arterial to Douglas Munro Blvd. to provide and alternative route from the project to the City center.

Table 23 shows that virtually every project entrance will fail to meet level of service criteria during summer peak periods causing significant congestion on adjacent roads, yet no mitigation is proposed. The project should be required to mitigate ALL impacts during peak periods. Roundabouts should be studied.

Comments on Sec 3.8 Aesthetics/Light & Glare

The developer is proposing a 100 ft buffer along most of the Bullfrog Rd. Corridor. For locations 3a, 3, 5 and 6 the SEIS states that views of the RV Resort ".... would be completely blocked ..... by the density of the existing trees associated with the approximately 100-foot on-site forested buffer that would be retained along the perimeter of the site in this area". This is factually incorrect. Views of the RV site will not be completely blocked by a 100 ft buffer. Evidence to this fact is available by just driving the corridor and looking through the trees. Additional evidence is that the Suncadia golf course is visible from Bullfrog Rd, in part, even though Suncadia provided a buffer of 400+ ft. of similar density trees. A better reflection of the impact of a 100 ft. buffer between 47 degrees North and Bullfrog Rd. would be the existing development in the vicinity of the Fire District #7 fire station, which is clearly visible through the current 75 ft +/- tree buffer.

For locations #7 and #8 the SEIS states "Views of proposed development on the site (e.g., single-family residential uses) would be completely blocked from view by the intervening approximately 500-1,000-foot open space/buffer that would be retained along the perimeter of the site in this area. These view locations look across the 250 foot to 300 foot wide cleared power line corridor, so there is substantial reason to believe that this statement is factually incorrect. The SEIS should include a simulation or modelling of the view of the project from Bullfrog road in the vicinity of the power line crossing to accurately assess the impact on views.

The proposed 100 ft buffer cited in the mitigations section is not adequate to prevent adverse cultural and economic impacts. Additional buffer width and/or mitigation should be provided in the SEIS document.

Comments on Sec 3.11 Parks & Recreation

The SEIS Section 3.11-9 states:

RV resort visitors under SEIS Alternative 6 would also contribute to the need for regional, county, and local parks and recreational facilities, particularly because they are often coming specifically to use the area's recreational resources. However, since these visitors would not be permanent, year-round residents, and the entire proposed RV resort would be considered a recreational amenity, the RV resort visitors are not expected to place as great a demand on off-site recreational resources as the permanent population in the proposed housing.

The two sentences in this paragraph seem to be contradictory, if the RV visitors come specifically to use the area's recreational resources, why would they be expected to have less demand than the permanent population. Without backup data it could easily be argued that the reverse is true. The SEIS should provide specific analysis or data to determine the actual impacts of the RV Resort on area parks and recreational facilities.

Section 3.11 provides no analysis of impacts (and mitigations) on Roslyn and Ronald area recreation facilities, among which are Coal Miners Trail, the Roslyn Urban Forest Mountain Bike Trail system, the Towns to Teanaway trail system, as well as various Roslyn Festivals and events. Roslyn is a major tourist and recreational attractor amenity which will clearly be visited by the Residents and RV users in the proposed project. It is within the 1 mile radius, and the SEIS team made public commitments to analyze impacts to up valley towns. The SEIS should include analysis of these impacts. The developer and City should meet with the City of Roslyn officials to define the scope of analysis and impacts on Parks and Recreation facilities in Roslyn and discuss appropriate mitigation.

I appreciate the opportunity to make these comments. If you have any questions or need clarification please feel free to contact me.

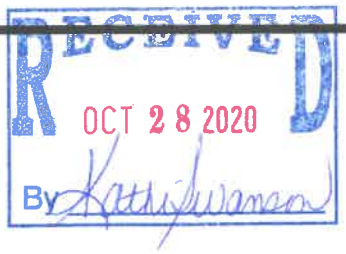
Respectfully submitted,
The Soderstrom Family
Mark, Veronica, Virginia, and Krystyne

--
Veronica Soderstrom
soderstromvj@gmail.com
509.304.5243

H-02

Letter L-95

SEPAResponsibleOfficial

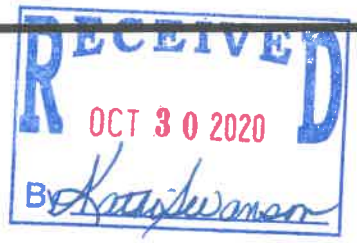


From: Davida St. Yves <davida0912@gmail.com>
Sent: Wednesday, October 28, 2020 11:35 AM
To: SEPAResponsibleOfficial
Subject: Request for a Community Center

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

~ Davida St. Yves, Cle Elum, WA

SEPAResponsibleOfficial



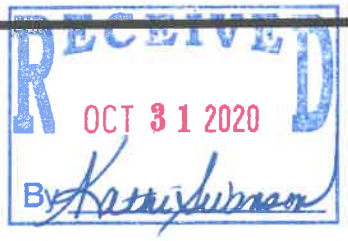
From: Susan Stern Smith <sss@susansternsmith.com>
Sent: Friday, October 30, 2020 7:56 AM
To: SEPAResponsibleOfficial
Subject: Suncadia agreement

Please enforce the past agreement for a community center around Bullfrog flats. It is the city's responsibility to enforce this and provide this agreed on community center to our community. 1

Susan Smith
Cle Elum resident
206-930-9481

Letter L-97

SEPAResponsibleOfficial



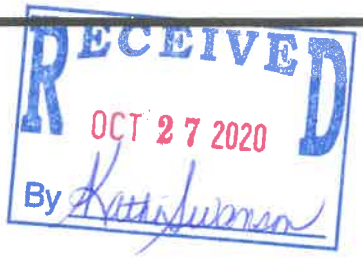
From: Eliza Stephenson <elizasells@yahoo.com>
Sent: Saturday, October 31, 2020 3:30 PM
To: SEPAResponsibleOfficial
Subject: 12 acres of land owed to CleElum

"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Eliza Stephenson
Realtor, RSPS, ASP, GRI
John L. Scott RE - Kittitas County
2019 KCAR President
Central Washington Regional Rep for
Washington Realtors
206-979-8216
elizasells@yahoo.com
CEDA board member

Letter L-98

SEPAResponsibleOfficial



From: Matt Thompson <mcthompson2000@hotmail.com>
Sent: Tuesday, October 27, 2020 9:38 AM
To: SEPAResponsibleOfficial
Subject: Bull frog flats and Suncadia

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Matthew C Thompson
2021 Hundley Rd
Cle Elum Wa 98922

SEPAResponsibleOfficial

From: tom.uren11 <tom.uren11@gmail.com>
Sent: Monday, November 02, 2020 10:57 AM
To: SEPAResponsibleOfficial
Cc: Richard Weinman
Subject: FW: 47 Degree North Draft SEIS comments

RECEIVED
NOV - 2 2020
By

Ms. Temple, I am sending my comments to this email address as well. The comments are identical to the comments I sent to your other address.

Ms. Temple,

Below are my comments on the 47 Degree North SEIS and Technical Reports. Please enter these into the record for the project.

General Comments on the proposal

The approximate population of the Cle Elum, Roslyn, South Cle Elum regional area per the SEIS is 3,350 people. The approximate population of the City of Cle Elum is 2,200 people. Proposed Alternate 5 would add 2,809 people, increasing the area population by 84%. Proposed Alternate 6 is somewhat smaller, but would still add 2,430 people (or equivalents), increasing the area population by 73%. Either alternative would more than double the size of the City of Cle Elum alone. 1

This near doubling of the population will have significant impacts across the board to local facilities and services, even services and facilities that are not normally considered in detail in typical SEIS's. Doubling of a population tends to do that; magnify impacts that for small developments might be considered negligible. For instance, as just a few examples: the police department will need to double in size, the Cle Elum transfer station will be over capacity and weekend queue lengths will likely be seriously congested, the local school system will be 30%+ over capacity and in addition to many new teachers, the schools themselves will need to be expanded and/or the children housed in portables. Every public infrastructure system in the area that will be expected to provide services to the project, whether City, County or special district, needs to be examined in detail, expansions or mitigations needed to service the proposal need to be detailed, all of the costs to expand services (personnel) and facilities (capital costs) need to be tabulated, and plans/schedules for funding (either private or public) need to be disclosed so that the public is informed of the actual cost and where costs will be assigned. Currently the SEIS does not do this (see more below). If some costs are to be borne by the public, either from general revenue, bonds and/or increased taxes this should be disclosed, to determine if they are significant impacts. If public funding and/or publicly backed bond issues are required to mitigate project impacts, and if this information is not disclosed until after the SEIS period is over, or even after the project is approved, the City and public will have not had the critical information needed to evaluate the project and could be faced with a potentially untenable choice; either fund whatever improvements are needed or accept lower levels of service. This is a current fundamental inadequacy of the SEIS that must be corrected. 2

At the present time, based on what I've read in the SEIS the developer does not appear to be proposing to fund any of the required infrastructure expansions, with the exception of a relatively small partial contribution to traffic mitigations that will not adequately fund needed improvements, and there are no plans or schedules as to 3

how the funding would take place. This means either the improvements will not be made and levels of service for all services in the region will drop, or costs of making the necessary infrastructure improvements will be borne by the public at a later date. Obviously an expansion of the City's tax base will increase revenues, and details are provided in the SEIS. The fiscal analysis describes a generally positive picture for the City of Cle Elum, that revenues will go up faster than costs and therefore the project will be a net benefit, at least to the city (the school district and other special districts however look to be net losers). However, the fiscal analysis is misleading because it includes only increased personnel and operating costs but does not include costs for capital improvements/facility expansions that are needed to support the near doubling of the population. This is a significant deficiency of the SEIS. If funding by the public is required to expand facilities to accommodate the proposal it needs to be disclosed. 3 cont'd

Generally across the board, for offsite impacts (impacts that occur outside the project boundaries), the SEIS does not propose any meaningful mitigations. It does not propose that any offsite road projects be constructed, it does not propose that any additional classrooms be built, it does not propose that any new police cars, fire fighting apparatus or ambulances get purchased, it doesn't even propose that any meaningful funding be provided by the developer for off site impacts. This is a serious deficiency in the SEIS. The very purpose of the environmental process is disclose impacts and propose a menu of mitigations for decision makers to choose from. The SEIS fails to do this. In one place there is a vague reference to negotiating future mitigation agreements with special district service providers. This is not mitigation in any meaningful sense and would effectively leave public disclosure out of the process. Actual mitigation to address impacts discussed must be shown in the SEIS. This is a fundamental deficiency of the SEIS. 4

The SEIS does not address concurrency. Whatever the disposition of the project (approval, denial, approval with conditions) any required infrastructure improvements that are needed to accommodate development (intersections, road widening, school expansion, police expansion, etc.), whether the responsibility of the developer, the City, special districts or a partnership, required improvements should be constructed before or simultaneously with the staged buildout of the proposal. The proposal should not be allowed to pay and go without a specific actual funded and scheduled plan for fixing the problems that are caused. If the needed improvements are not constructed concurrent with development of the proposal, there will be unmitigated impacts from the project and this needs to be disclosed. Lack of analysis of concurrency in the SEIS is a fundamental deficiency. 5

General Comments on RV Resort

The proposed Alternative 6a 627 space RV Resort would be the largest RV park facility in the state of Washington (based on internet research). The local RV park in Ellensburg (85 units) that is used to develop some of the statistical parameters to evaluate impacts for the proposal is only roughly 10% the size of the proposed RV resort and is not close to the same type of facility in terms of design, amenities and programming. The RV Resort will likely be a major regional attractor. To put the RV facility in perspective, during the summer and peak periods it will likely have a population equal to or greater than the City of Roslyn. There is no data or analysis in the documents to show why it is reasonable to extrapolate statistics from a small local RV park to apply to a massive RV resort project. Other statistical elements of the RV resort provided in the SEIS (for instance occupancy rates, trip generation, assuming 941 equivalent population for the RV Resort) appear to be back of the envelope estimates with no data to back up the assumptions. Given the size and impact for this facility, the SEIS and technical reports should provide statistics on similar size and scope RV resort projects to justify assumptions used in the analysis, trip generation, occupancy rates, police call generation, etc. Without some level of backup data to support assumptions the results of the RV Resort impact analysis must be considered suspect and inadequate. 6

The project proponent, Sun Communities, is literally in the business of building mixed-use communities like the

Alternative 6 proposal all over the country; that is their business plan, it is what they do. I understand at least several of their past projects have been associated with other small towns like CleElum/ Roslyn. Actual results from these other Sun Communities projects, what impacts actually occurred, what mitigation actually worked, how Sun Communities performed, what other governments actually experienced, should all be incorporated in the SEIS. Before this proposal is acted on, actual data from similar Sun Communities projects should be included in the SEIS so the City and public knows what it's signing on to. 7

Having the RV Resort analyzed accurately (and separately) is critical because of its size and impacts, but also because it is a private business. Because it is a private business, no public funds should be used to support it. If the current SEIS analysis understates impacts of the business and as a result public funds are needed to correct impacts (for instance for improvements to Bullfrog Rd project entrances or for increased police service) these public expenditures would be wholly inappropriate. 8

All impacts, and revenues, resulting from the RV Resort should be tabulated so that they can be viewed separately from the larger Alternative 6 proposal. While it can be construed that there might be some legal mandate to support adding residential housing on this site because of past approvals and to meet WA state GMA targets, there is no legal mandate to allow any specific type of private business, particularly one as large as the proposed RV resort. Therefore, the public, and the City, should be able to easily compare the prospective benefits and impacts from this business proposal to inform all decisions. 9

General Comments on Bullfrog Flats View Corridor

The Bullfrog Flats corridor, and its visual characteristics, is a critical cultural and recreational feature for the upper Kittitas County region. The road is the gateway to upper valley recreation, camping and tourist activities. It's the first (and last) thing visitors experience when they exit I-90 and proceed up-valley. Its forested character contributes significantly to the "mountain" experience which supports regional recreation and tourism, which are important aspects of the upper valley economy. The importance of the Bullfrog Rd corridor has long been recognized, as evidenced by the 400 to 600 ft buffer provided by the Suncadia Resort when it was approved. If the look and feel of this corridor is significantly diminished, if it is transformed into an urban type experience, the character, and possibly the economy of the upper valley, will be significantly adversely affected. 10

The developer is proposing a 100 ft buffer along most of the Bullfrog Rd. Corridor. The SEIS states that all but one location abutting the RV Resort "Views of proposed development on the site (e.g., RV resort uses) would be completely blocked ..... by the density of the existing trees associated with the approximately 100-foot on-site forested buffer that would be retained along the perimeter of the site in this area". This is factually incorrect. Development on the site will not be completely blocked by a 100 ft buffer. Further discussion is provided in comments below. This is a significant adverse impact which can relatively easily be mitigated by the project by providing additional and appropriate buffer widths to obscure the development from view. On a site as large as this, sufficient area is available to do so without interfering with project objectives. 11

Comments on Public Services Section

For Alternative 5 (1,334 single family units, 2,809 new residents, commercial/industrial area) the SEIS shows that:

An additional 7 to 12 new police officers will be needed to serve the project (more than doubling of the current force). An Additional 3 full time professional fire fighters will be required. 6 new EMT's and 7 new paramedics will be needed. The local medical clinic will require an additional physician, 5 APC's and 6 RN's. For Schools, this alternative would add 337 new students, which would exceed current school capacity by about 35% and require 23 new teachers and 6 to 7 new buses. As the school is essentially now at capacity, additional 12

classrooms will be required. The SEIS does not provide detail on how these additional service providers (and additional students) will be housed, what facilities, equipment and supplies are needed and how that will be funded. This is not adequate. 12 cont'd

For Alternative 6 (707 units (SF and MF), 1,489 new residents, 600+ unit RV Resort, commercial area) the SEIS shows that:

An additional 6 to 8 new police officers will be needed to serve the project (doubling of the current force). An Additional 3 full time professional fire fighters will be required. 4 new EMT's and 5 new paramedics will be neededThe local medical clinic will require an additional physician, 5 APC's and 4 RN's. For Schools, this alternative would add 177 new students, which would exceed current school capacity by about 20% and require 23 new teachers and 6 to 7 new buses. As the school is essentially now at capacity, additional classrooms will be required. The SEIS does not provide detail on how these additional service providers (and additional students) will be housed, what facilities, equipment and supplies are needed and how that will be funded. This is not adequate. 13

For either alternative, the SEIS provides no actual detail on what improvements/expansions to facilities and equipment are needed to support the new officers, firefighters, EMT's, teachers, etc. that will be required by the project. The SEIS does recognize qualitatively that new facilities, classrooms, etc. will be required, but not in sufficient detail to estimate costs that can be included in the Fiscal Impacts and Economic Analysis. Costs for required public facility expansions (new police station, new classrooms, new fire fighting apparatus, etc.) could easily reach many tens of millions of dollars. From a land use process perspective at this point it may not be determined how exactly all of these costs will be funded, but they definitely need to be funded somehow and therefore they need to be included in the SEIS and Fiscal Analysis. This is a significant impact of the project and the absence of this information makes the SEIS fundamentally inadequate, preventing the public from seeing the full magnitude of project costs and impacts. Capital improvement and equipment costs need to be detailed, estimated and included. 14

Comments on Utilities Section 3,14

Solid Waste

the SEIS states "The Cle Elum Transfer Station is reported to be near capacity based on the number of cars queued at the station on Saturdays." Currently, other than this general statement the document contains no detailed analysis of impacts. This is inadequate because queue lengths at the Transfer Station are a direct impact to current residents and have a direct impact on the rate of illegal dumping on local roads. The SEIS should include a detailed analysis of the existing level of service (queue lengths) at the Transfer Station, the impact of the proposal on these queue lengths, measures to mitigate increases in queue length/capacity, who will pay for these mitigations and if they will be constructed concurrently with growth. Any costs to expand transfer facilities should be included in the fiscal analysis. 15

Sewer

The SEIS states "The City confirmed that the wastewater treatment demand is within the capacity of the City wastewater treatment plant, which was designed to accommodate the project," but no detailed data and tabulation of existing WWTP capacity, number of connections, residual capacity is provided. The City's WWTP serves Suncadia, Roslyn and Ronald in addition to the City's service area. By agreement these entities all have reserved capacity in the WWTP to serve their individual service areas, therefore there is wider interest in potential impacts to WWTP capacity than just within the city itself. A doubling of the City's population, and presumably a doubling of its flows to the WTP, is significant. A WWTP expansion, if it were ever needed to 16

accommodate growth, would be extremely expensive. The City apparently has data that led it to conclude that sufficient capacity exists to serve the proposal. The SEIS should include this data. 16 cont'd

Comments on Fiscal and Economic Analysis

The fiscal analysis does not include all of the costs needed to accommodate the proposal. It includes estimates of increased personnel and operating costs for the City and special purpose districts serving the area but does not include the cost of capital improvements/expansions/equipment needed to support the proposal. As examples (but not a complete list): 17

Per the SEIS between 10 and 15 intersections will need to be improved to meet level of service standards. The cost could easily reach $10 to $15 million (or more). The developer appears to be proposing funding a very small portion of this amount. If that is accurate, presumably the city/county will be required to fund the remainder, either from the general fund or via bonds (increased taxes). This is a significant cost which should be included so the public and decision makers can assess impacts. 18

Per the SEIS school populations will increase by 20% to 30% exceeding the capacity of current school facilities. How will these new students (and the 12 to 23 new teachers) be housed? The SEIS provides no details. New schools or school expansions are very expensive (many millions of dollars, or tens of millions if new schools are required). This is a huge undisclosed impact. It appears the developer is not proposing to fund school expansion so presumably the public will need fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the school expansions or if a general tax increase is necessary. 19

Per the SEIS the size of the police force will need to double. Facility improvements and equipment additions will likely be needed to accommodate a doubling of the police force, but no details or costs are included in the SEIS. It appears the developer is not proposing to fund police facility expansion so presumably the public will need to fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the police facility and equipment expansions or if a general tax increase is necessary. 20

The SEIS Section 3.14 states that the Cle Elum transfer station is currently operating at capacity and the additional stream of solid waste (garbage) from Alt's 5 or 6 would exceed the current capacity requiring expansion of the facility. The cost of this expansion is not reported in the SEIS fiscal analysis. It appears the developer is not proposing to fund this expansion so presumably the public will need to fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the facility or if a general tax increase is necessary. 21

As the land use process progresses the City's responsible officials will determine what costs or improvements can be assigned to the project developer, which will be funded by the City's general fund, which will be funded by new bond issues (increased taxes), which will be funded by special purpose districts, etc. but unless all the capital facility and equipment costs are included and the bottom line cost accurately tabulated, the SEIS will not adequately disclose the true impacts and the public and city officials will not be adequately informed. The SEIS Fiscal analysis should include all costs required to serve the project. 22

Comments on TENW traffic report (Note: comments are provided on the transportation source document, but not specifically on the transportation section of the SEIS. However, all comments on the TENW traffic report should be construed to apply to the applicable sections of the SEIS proper)

General - The upper county is not a "typical" urban area. The economy, land use and traffic patterns of the upper county is primarily driven by recreational use and seasonal tourism. There are a number of statements in 23

the Traffic report that imply that "standard" engineering assumptions for typical urban development are appropriate, and that busy weekend peak hours need not be mitigated because they are so short. Heavy seasonal and weekend recreational use IS the normal for the upper county against which impacts of the proposed project should be measured. I believe that the traffic impacts for weekday periods is somewhat overstated and that impacts during peak summer weekend periods are significantly understated. To the extent that the traffic analysis, and subsequent mitigation assumptions, are based on trip generation/distribution from "typical" urban areas that are non recreational/tourist oriented, they must be revised to focus on actual area patterns. 23 cont"d

Page 5, paragraph 2: The report states "it is not standard traffic engineering practice to mitigate for traffic conditions that only occur for a few hours a week during the summer months". I don't believe this to be true, there are no specific engineering standards for mitigation. Requirements for mitigation vary by jurisdiction. The City of Cle Elum may (or may not) decide to mitigate specific project impacts after viewing the data. Regarding mitigation for short period impacts, if there was a standard or code as cited, then no stadium project, event, or other short but significant project would ever be required to mitigate its impacts. The report should remove references to engineering standards for mitigation. 24

Section 2.5 (1st paragraph) and Fehr memorandum (page 2) states the Kittitas County model was calibrated with 2019 weekday PM traffic counts, but the traffic counts, locations, dates and times gathered, do not appear to have been provided in the report. This information should be included for public review, as it is not possible to assess the validity of model predictions without this information. It is well known locally that there are intersections in the study area that currently operate at LOS F during peak summer periods when I-90 is at capacity. This does not appear to be reflected in the study as an existing baseline condition. 25

Section 2.5 (1st paragraph) states that traffic counts at intersections 21 - 24 were collected in December and then increased by 64 percent using WSDOT guidelines to estimate peak summer conditions. This is not accurate and significantly understates existing summer peak period traffic. Intersection 21 (Roslyn - Pennsylvania and 903) currently operates at LOS F during peak summer periods, not LOS C as shown. Current wait times significantly exceed the 17 to 20 sec stated in the report and so the impacts of the proposal in future years are understated. At peak times the traveling public uses local side streets to bypass congestion on 903 through Roslyn, causing impacts to Roslyn residents. The additional traffic from the proposed development will significantly worsen the situation. The SEIS consultant team should meet with City of Roslyn staff to verify existing conditions and update the models to accurately reflect existing conditions and accurately report project impacts. 26

Section 2.5 (1st paragraph) traffic counts at intersections 21 - 24: The upper county/Roslyn has numerous festivals, events and iconic businesses during the peak summer season that are major attractors that significantly affect traffic patterns, trip generation and parking needs during peak periods. These events have been going on for many years, some for decades, and are effectively part of the baseline. Surely the proposed development will similarly be attracted to these events and downtown Roslyn. The trip distribution in the SEIS does not appear to include this attractiveness, and the trip distribution to Roslyn during peak periods seems very understated. The SEIS consultant team should meet with City of Roslyn staff to verify existing model distributions and update to accurately reflect existing conditions and accurately report project impacts. 27

Section 2.5 Future 'Baseline' Traffic Volumes - The I-90 Snoqualmie Pass East widening project appears to be inducing more traffic and growth in the Upper County area (both permanent residents and recreational use), and with the next phase to Easton underway this is likely to accelerate. Do the traffic growth assumptions include this induced growth as baseline? What magnitude was assumed? 28

Section 2.6 Existing Intersection LOS, Table 7 - As noted above the LOS at intersection 21 is not LOS B. It frequently operates at LOS F during peak summer periods. 29

Section 2.6, Page 25 last paragraph - The report states "it is not standard traffic engineering practice to mitigate for traffic conditions that only occur for a few hours a week during the summer months". See comment above, this statement should be removed from the report. 30

Pages 28 & 29, Future baseline conditions - Intersection 21 currently operates at LOS F. Report should be revised accordingly 31

Sections 3.4 & 3.17, Trip Generation: For both Alternatives 5 and 6 it appears that trip generation for the residential portion assumes typical Urban type development trip generation patterns where peak trips are to and from employment centers during PM peak hours. However, upper county does not follow typical Urban Development patterns as noted above. It is likely that either Alts 5 or 6 will contain significant amounts of "2nd houses" for weekend use and rental (unless prohibited by deed restriction). This weekend use pattern will drive up the trip generation to and from the site during the Friday and Sunday peak periods and so the analysis as currently completed may well understate the impacts of the proposal during these periods. The analysis should be revised accordingly. 32

For Alternative 6 RV resort see General Comments on RV Resort above. The parameters and statistics used to assess RV Resort impacts are based on much smaller RV parks. Additional data based on facilities of similar type and size should be provided to verify model assumptions. 33

For Alternative 6 RV resort, what is the basis for trip generation? I could not find a separate trip generation table for the RV resort in the report and it appears that weekend trips to the resort by RVs are understated. Unless specific studies are provided to the contrary, it would seem logical to assume that many, if not most, RV sites will turn over on weekends, significantly driving up the trips and impacts. 34

Before a new supermarket is built in the proposed commercial center (2031), the only full service supermarket in the upper county is Safeway at W 1st st and Douglas Munro Blvd. Being the only supermarket, it is a major traffic attractor and its "attractiveness" could be understated by standard ITE criteria. The effect is magnified by the recreational use patterns as many weekend visitors stop at the Safeway before continuing, to their ultimate destinations, particularly on Friday afternoon/evenings. Has this clearly known effect been included in the models? If the traffic analysis assumes that a supermarket in the commercial area will reduce offsite impacts then there should be a specific timeline and commitment by the developer to have the new supermarket constructed at a specific date. If the timing of a new supermarket will be allowed to be driven by market conditions, then the study should provide clear justification for any timing that is assumed. 35

Sections 3.2, 3.3, 3.14 & 3.15, Roadway Network, Site Access and Circulation: While the site is located in the City's urban growth area, it is essentially "disconnected" from the City proper. The SEIS should study the possibility of extending a new arterial road from the residential portion of the site directly to Douglas Munro Blvd. to provide direct connectivity to the City's primary Urban Area, businesses, services, a second access to I-90 as well as access to the future low cost housing site (which currently has no access point shown on the site plan). It would also reduce impacts to Roslyn, Ronald and other residences along 903. 36

Sections 3.6, 3.7, Future Intersection Volumes / LOS - The impacts at Intersection 21 (903 and Pennsylvania in Roslyn) are understated - see above 37

Table 23, Page 57, Site Access LOS Summary - Table 23 shows that every project entrance will fail during summer peak periods. Bullfrog Rd and 903 are critical ingress/egress roads for the region, for both residents and weekend visitors that come and go from I-90 to up valley areas. It is the "Front Door" to up valley areas. The traffic report should detail what these LOS failures actually mean for the traveling public headed up valley but not going to the project, what level of congestion, length of queues and delays on the main road, etc, To the extent that new congestion on Bullfrog and 903 caused by the project makes it more difficult to proceed 38

up valley this will result in significant impacts and should be disclosed (and mitigated). Congestion that degrades the experience of weekenders headed up valley WILL impact up valley towns and businesses. 38 cont'd

Section 3.8 & 3.19 - Have WSDOT or Kittitas county been consulted about replacing stop controlled intersections on SR 903 and Bullfrog Rd with roundabouts to match existing facilities that abut the project? Current WSDOT guidelines generally show a preference for roundabouts at all new access points of major developments. Roundabouts at site access points should be included in the study. 39

Section 4 - Mitigation Measures: Impacts, and mitigations, for all weekend peak periods should be included (see above). 40

Contribution of funds based on the project's calculated proportional share of impacts is not adequate, or effective, mitigation unless the contribution is made to an actual Public Capital improvement project that is scheduled for construction prior to or concurrent with the timing of the impact (concurrency). Partial funding that does not result in road or intersection projects being caused to be built does not mitigate project impacts. To mitigate project impacts in fact and maintain a reasonable concurrency four options are available:

1. The project is responsible to construct the improvements necessary to maintain adequate levels of service on affected roads as the development is built out; 41
2. The project can partner with other developers or municipalities to construct necessary improvements in a timely way;
3. The project can wait until necessary improvements are constructed by others and road capacity actually exists to proceed;
4. If an affected jurisdiction has a Capital Improvement Plan that includes construction of necessary improvements, the project can contribute to it (and accelerate needed elements) so that improvements are concurrent with impacts. Note that any solution that includes the expenditure of public funds to construct improvements needed for the development to proceed and require new taxes to do so, constitutes a financial impact on the public that must be analyzed and disclosed in the SEIS.

The impacts to Intersection 21 (903 and Pennsylvania in Roslyn) are understated and mitigation by the project should be required. The developer and City should meet with the City of Roslyn officials to work out acceptable mitigation. 42

The project should be required to extend an arterial to Douglas Munro Blvd. to provide and alternative route from the project to the City center. 43

Table 23 shows that virtually every project entrance will fail to meet level of service criteria during summer peak periods causing significant congestion on adjacent roads, yet no mitigation is proposed. The project should be required to mitigate ALL impacts during peak periods. Roundabouts should be studied. 44

Comments on Sec 3.8 Aesthetics/Light & Glare

The developer is proposing a 100 ft buffer along most of the Bullfrog Rd. Corridor. For locations 3a, 3, 5 and 6 the SEIS states that views of the RV Resort ".... would be completely blocked ..... by the density of the existing trees associated with the approximately 100-foot on-site forested buffer that would be retained along the perimeter of the site in this area". This is factually incorrect. Views of the RV site will not be completely blocked by a 100 ft buffer. Evidence to this fact is available by just driving the corridor and looking through the trees. Additional evidence is that the Suncadia golf course is visible from Bullfrog Rd, in part, even though Suncadia provided a buffer of 400+ ft. of similar density trees. A better reflection of the impact of a 100 ft. buffer between 47 degrees North and Bullfrog Rd. would be the existing development in the vicinity of the Fire District #7 fire station, which is clearly visible through the current 75 ft +/- tree buffer. 45

For locations #7 and #8 the SEIS states "Views of proposed development on the site (e.g., single-family residential uses) would be completely blocked from view by the intervening approximately 500-1,000-foot open space/buffer that would be retained along the perimeter of the site in this area. These view locations look across the 250 foot to 300 foot wide cleared power line corridor, so there is substantial reason to believe that this statement is factually incorrect. The SEIS should include a simulation or modelling of the view of the project from Bullfrog road in the vicinity of the power line crossing to accurately assess the impact on views. 46

The proposed 100 ft buffer cited in the mitigations section is not adequate to prevent adverse cultural and economic impacts. Additional buffer width and/or mitigation should be provided in the SEIS document. 47

Comments on Sec 3.11 Parks & Recreation

The SEIS Section 3.11-9 states:

RV resort visitors under SEIS Alternative 6 would also contribute to the need for regional, county, and local parks and recreational facilities, particularly because they are often coming specifically to use the area's recreational resources. However, since these visitors would not be permanent, year-round residents, and the entire proposed RV resort would be considered a recreational amenity, the RV resort visitors are not expected to place as great a demand on off-site recreational resources as the permanent population in the proposed housing. 48

The two sentences in this paragraph seem to be contradictory, if the RV visitors come specifically to use the area's recreational resources, why would they be expected to have less demand than the permanent population. Without backup data it could easily be argued that the reverse is true. The SEIS should provide specific analysis or data to determine the actual impacts of the RV Resort on area parks and recreational facilities.

Section 3.11 provides no analysis of impacts (and mitigations) on Roslyn and Ronald area recreation facilities, among which are Coal Miners Trail, the Roslyn Urban Forest Mountain Bike Trail system, the Towns to Teanaway trail system, as well as various Roslyn Festivals and events. Roslyn is a major tourist and recreational attractor amenity which will clearly be visited by the Residents and RV users in the proposed project. It is within the 1 mile radius, and the SEIS team made public commitments to analyze impacts to up valley towns. The SEIS should include analysis of these impacts. The developer and City should meet with the City of Roslyn officials to define the scope of analysis and impacts on Parks and Recreation facilities in Roslyn and discuss appropriate mitigation. 49

Lastly, I understand that the CIty proposes that comments to the SEIS will be addressed in the FSEIS. Considering the fundamental inadequacies in the SEIS outlined above, the lack of proposed mitigations, how mitigations will be funded, lack of data on elements of the project, etc, I request that the city do not proceed straight to FSEIS but rather that the City issue an amended SEIS for additional public review and comment. Given the size of the project, the magnitude of impacts to the region, the lack of clarity on proposed mitigations and who will fund them, it is only reasonable and fair for the public to have complete information on the proposal before it proceeds to the next step. 50

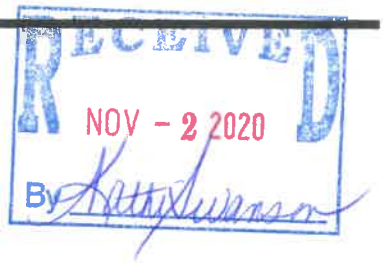
I appreciate the opportunity to make these comments, if you have any questions or need clarification please feel free to contact me. If you could drop a quick note to confirm the timely submittal I would greatly appreciate it.

Respectfully submitted,

H-02

Tom Uren, P.E.
103 N "E" St
Roslyn WA 98941
206-947-2566

SEPAResponsibleOfficial



From: Lucy Temple
Sent: Monday, November 02, 2020 10:58 AM
To: SEPAResponsibleOfficial
Subject: FW: 47 Degree North Draft SEIS comments

Comment below received by myself and Richard. Please save with all the other comments.

From: thomas uren [mailto:tom.uren11@gmail.com]
Sent: Monday, November 2, 2020 9:59 AM
To: Lucy Temple
Cc: RICHARD WEINMAN
Subject: 47 Degree North Draft SEIS comments

Ms. Temple,

Below are my comments on the 47 Degree North SEIS and Technical Reports. Please enter these into the record for the project.

General Comments on the proposal

The approximate population of the Cle Elum, Roslyn, South Cle Elum regional area per the SEIS is 3,350 people. The approximate population of the City of Cle Elum is 2,200 people. Proposed Alternate 5 would add 2,809 people, increasing the area population by 84%. Proposed Alternate 6 is somewhat smaller, but would still add 2,430 people (or equivalents), increasing the area population by 73%. Either alternative would more than double the size of the City of Cle Elum alone.

This near doubling of the population will have significant impacts across the board to local facilities and services, even services and facilities that are not normally considered in detail in typical SEIS's. Doubling of a population tends to do that; magnify impacts that for small developments might be considered negligible. For instance, as just a few examples: the police department will need to double in size, the Cle Elum transfer station will be over capacity and weekend queue lengths will likely be seriously congested, the local school system will be 30%+ over capacity and in addition to many new teachers, the schools themselves will need to be expanded and/or the children housed in portables. Every public infrastructure system in the area that will be expected to provide services to the project, whether City, County or special district, needs to be examined in detail, expansions or mitigations needed to service the proposal need to be detailed, all of the costs to expand services (personnel) and facilities (capital costs) need to be tabulated, and plans/schedules for funding (either private or public) need to be disclosed so that the public is informed of the actual cost and where costs will be assigned. Currently the SEIS does not do this (see more below). If some costs are to be borne by the public, either from general revenue, bonds and/or increased taxes this should be disclosed, to determine if they are significant impacts. If public funding and/or publicly backed bond issues are required to mitigate project impacts, and if this information is not disclosed until after the SEIS period is over, or even after the project is approved, the City and public will have not had the critical information needed to evaluate the project and could be faced with a potentially untenable choice; either fund whatever improvements are needed or accept lower levels of service. This is a current fundamental inadequacy of the SEIS that must be corrected.

At the present time, based on what I've read in the SEIS the developer does not appear to be proposing to fund

H-02

any of the required infrastructure expansions, with the exception of a relatively small partial contribution to traffic mitigations that will not adequately fund needed improvements, and there are no plans or schedules as to how the funding would take place. This means either the improvements will not be made and levels of service for all services in the region will drop, or costs of making the necessary infrastructure improvements will be borne by the public at a later date. Obviously an expansion of the City's tax base will increase revenues, and details are provided in the SEIS. The fiscal analysis describes a generally positive picture for the City of Cle Elum, that revenues will go up faster than costs and therefore the project will be a net benefit, at least to the city (the school district and other special districts however look to be net losers). However, the fiscal analysis is misleading because it includes only increased personnel and operating costs but does not include costs for capital improvements/facility expansions that are needed to support the near doubling of the population. This is a significant deficiency of the SEIS. If funding by the public is required to expand facilities to accommodate the proposal it needs to be disclosed.

Generally across the board, for offsite impacts (impacts that occur outside the project boundaries), the SEIS does not propose any meaningful mitigations. It does not propose that any offsite road projects be constructed, it does not propose that any additional classrooms be built, it does not propose that any new police cars, fire fighting apparatus or ambulances get purchased, it doesn't even propose that any meaningful funding be provided by the developer for off site impacts. This is a serious deficiency in the SEIS. The very purpose of the environmental process is disclose impacts and propose a menu of mitigations for decision makers to choose from. The SEIS fails to do this. In one place there is a vague reference to negotiating future mitigation agreements with special district service providers. This is not mitigation in any meaningful sense and would effectively leave public disclosure out of the process. Actual mitigation to address impacts discussed must be shown in the SEIS. This is a fundamental deficiency of the SEIS.

The SEIS does not address concurrency. Whatever the disposition of the project (approval, denial, approval with conditions) any required infrastructure improvements that are needed to accommodate development (intersections, road widening, school expansion, police expansion, etc.), whether the responsibility of the developer, the City, special districts or a partnership, required improvements should be constructed before or simultaneously with the staged buildout of the proposal. The proposal should not be allowed to pay and go without a specific actual funded and scheduled plan for fixing the problems that are caused. If the needed improvements are not constructed concurrent with development of the proposal, there will be unmitigated impacts from the project and this needs to be disclosed. Lack of analysis of concurrency in the SEIS is a fundamental deficiency.

General Comments on RV Resort

The proposed Alternative 6a 627 space RV Resort would be the largest RV park facility in the state of Washington (based on internet research). The local RV park in Ellensburg (85 units) that is used to develop some of the statistical parameters to evaluate impacts for the proposal is only roughly 10% the size of the proposed RV resort and is not close to the same type of facility in terms of design, amenities and programming. The RV Resort will likely be a major regional attractor. To put the RV facility in perspective, during the summer and peak periods it will likely have a population equal to or greater than the City of Roslyn. There is no data or analysis in the documents to show why it is reasonable to extrapolate statistics from a small local RV park to apply to a massive RV resort project. Other statistical elements of the RV resort provided in the SEIS (for instance occupancy rates, trip generation, assuming 941 equivalent population for the RV Resort) appear to be back of the envelope estimates with no data to back up the assumptions. Given the size and impact for this facility, the SEIS and technical reports should provide statistics on similar size and scope RV resort projects to justify assumptions used in the analysis, trip generation, occupancy rates, police call generation, etc. Without some level of backup data to support assumptions the results of the RV Resort impact analysis must be considered suspect and inadequate.

The project proponent, Sun Communities, is literally in the business of building mixed-use communities like the Alternative 6 proposal all over the country; that is their business plan, it is what they do. I understand at least several of their past projects have been associated with other small towns like CleElum/ Roslyn. Actual results from these other Sun Communities projects, what impacts actually occurred, what mitigation actually worked, how Sun Communities performed, what other governments actually experienced, should all be incorporated in the SEIS. Before this proposal is acted on, actual data from similar Sun Communities projects should be included in the SEIS so the City and public knows what it's signing on to.

Having the RV Resort analyzed accurately (and separately) is critical because of its size and impacts, but also because it is a private business. Because it is a private business, no public funds should be used to support it. If the current SEIS analysis understates impacts of the business and as a result public funds are needed to correct impacts (for instance for improvements to Bullfrog Rd project entrances or for increased police service) these public expenditures would be wholly inappropriate.

All impacts, and revenues, resulting from the RV Resort should be tabulated so that they can be viewed separately from the larger Alternative 6 proposal. While it can be construed that there might be some legal mandate to support adding residential housing on this site because of past approvals and to meet WA state GMA targets, there is no legal mandate to allow any specific type of private business, particularly one as large as the proposed RV resort. Therefore, the public, and the City, should be able to easily compare the prospective benefits and impacts from this business proposal to inform all decisions.

General Comments on Bullfrog Flats View Corridor

The Bullfrog Flats corridor, and its visual characteristics, is a critical cultural and recreational feature for the upper Kittitas County region. The road is the gateway to upper valley recreation, camping and tourist activities. It's the first (and last) thing visitors experience when they exit I-90 and proceed up-valley. Its forested character contributes significantly to the "mountain" experience which supports regional recreation and tourism, which are important aspects of the upper valley economy. The importance of the Bullfrog Rd corridor has long been recognized, as evidenced by the 400 to 600 ft buffer provided by the Suncadia Resort when it was approved. If the look and feel of this corridor is significantly diminished, if it is transformed into an urban type experience, the character, and possibly the economy of the upper valley, will be significantly adversely affected.

The developer is proposing a 100 ft buffer along most of the Bullfrog Rd. Corridor. The SEIS states that all but one location abutting the RV Resort "Views of proposed development on the site (e.g., RV resort uses) would be completely blocked ..... by the density of the existing trees associated with the approximately 100-foot on-site forested buffer that would be retained along the perimeter of the site in this area". This is factually incorrect. Development on the site will not be completely blocked by a 100 ft buffer. Further discussion is provided in comments below. This is a significant adverse impact which can relatively easily be mitigated by the project by providing additional and appropriate buffer widths to obscure the development from view. On a site as large as this, sufficient area is available to do so without interfering with project objectives.

Comments on Public Services Section

For Alternative 5 (1,334 single family units, 2,809 new residents, commercial/industrial area) the SEIS shows that:

An additional 7 to 12 new police officers will be needed to serve the project (more than doubling of the current force). An Additional 3 full time professional fire fighters will be required. 6 new EMT's and 7 new paramedics will be needed. The local medical clinic will require an additional physician, 5 APC's and 6 RN's. For Schools,

this alternative would add 337 new students, which would exceed current school capacity by about 35% and require 23 new teachers and 6 to 7 new buses. As the school is essentially now at capacity, additional classrooms will be required. The SEIS does not provide detail on how these additional service providers (and additional students) will be housed, what facilities, equipment and supplies are needed and how that will be funded. This is not adequate.

For Alternative 6 (707 units (SF and MF), 1,489 new residents, 600+ unit RV Resort, commercial area) the SEIS shows that:

An additional 6 to 8 new police officers will be needed to serve the project (doubling of the current force). An Additional 3 full time professional fire fighters will be required. 4 new EMT's and 5 new paramedics will be neededThe local medical clinic will require an additional physician, 5 APC's and 4 RN's. For Schools, this alternative would add 177 new students, which would exceed current school capacity by about 20% and require 23 new teachers and 6 to 7 new buses. As the school is essentially now at capacity, additional classrooms will be required. The SEIS does not provide detail on how these additional service providers (and additional students) will be housed, what facilities, equipment and supplies are needed and how that will be funded. This is not adequate.

For either alternative, the SEIS provides no actual detail on what improvements/expansions to facilities and equipment are needed to support the new officers, firefighters, EMT's, teachers, etc. that will be required by the project. The SEIS does recognize qualitatively that new facilities, classrooms, etc. will be required, but not in sufficient detail to estimate costs that can be included in the Fiscal Impacts and Economic Analysis. Costs for required public facility expansions (new police station, new classrooms, new fire fighting apparatus, etc.) could easily reach many tens of millions of dollars. From a land use process perspective at this point it may not be determined how exactly all of these costs will be funded, but they definitely need to be funded somehow and therefore they need to be included in the SEIS and Fiscal Analysis. This is a significant impact of the project and the absence of this information makes the SEIS fundamentally inadequate, preventing the public from seeing the full magnitude of project costs and impacts. Capital improvement and equipment costs need to be detailed, estimated and included.

Comments on Utilities Section 3,14

Solid Waste

the SEIS states "The Cle Elum Transfer Station is reported to be near capacity based on the number of cars queued at the station on Saturdays." Currently, other than this general statement the document contains no detailed analysis of impacts. This is inadequate because queue lengths at the Transfer Station are a direct impact to current residents and have a direct impact on the rate of illegal dumping on local roads. The SEIS should include a detailed analysis of the existing level of service (queue lengths) at the Transfer Station, the impact of the proposal on these queue lengths, measures to mitigate increases in queue length/capacity, who will pay for these mitigations and if they will be constructed concurrently with growth. Any costs to expand transfer facilities should be included in the fiscal analysis.

Sewer

The SEIS states "The City confirmed that the wastewater treatment demand is within the capacity of the City wastewater treatment plant, which was designed to accommodate the project," but no detailed data and tabulation of existing WWTP capacity, number of connections, residual capacity is provided. The City's WWTP serves Suncadia, Roslyn and Ronald in addition to the City's service area. By agreement these entities all have reserved capacity in the WWTP to serve their individual service areas, therefore there is wider interest in

potential impacts to WWTP capacity than just within the city itself. A doubling of the City's population, and presumably a doubling of its flows to the WTP, is significant. A WWTP expansion, if it were ever needed to accommodate growth, would be extremely expensive. The City apparently has data that led it to conclude that sufficient capacity exists to serve the proposal. The SEIS should include this data.

Comments on Fiscal and Economic Analysis

The fiscal analysis does not include all of the costs needed to accommodate the proposal. It includes estimates of increased personnel and operating costs for the City and special purpose districts serving the area but does not include the cost of capital improvements/expansions/equipment needed to support the proposal. As examples (but not a complete list):

Per the SEIS between 10 and 15 intersections will need to be improved to meet level of service standards. The cost could easily reach $10 to $15 million (or more). The developer appears to be proposing funding a very small portion of this amount. If that is accurate, presumably the city/county will be required to fund the remainder, either from the general fund or via bonds (increased taxes). This is a significant cost which should be included so the public and decision makers can assess impacts.

Per the SEIS school populations will increase by 20% to 30% exceeding the capacity of current school facilities. How will these new students (and the 12 to 23 new teachers) be housed? The SEIS provides no details. New schools or school expansions are very expensive (many millions of dollars, or tens of millions if new schools are required). This is a huge undisclosed impact. It appears the developer is not proposing to fund school expansion so presumably the public will need fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the school expansions or if a general tax increase is necessary.

Per the SEIS the size of the police force will need to double. Facility improvements and equipment additions will likely be needed to accommodate a doubling of the police force, but no details or costs are included in the SEIS. It appears the developer is not proposing to fund police facility expansion so presumably the public will need to fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the police facility and equipment expansions or if a general tax increase is necessary.

The SEIS Section 3.14 states that the Cle Elum transfer station is currently operating at capacity and the additional stream of solid waste (garbage) from Alt's 5 or 6 would exceed the current capacity requiring expansion of the facility. The cost of this expansion is not reported in the SEIS fiscal analysis. It appears the developer is not proposing to fund this expansion so presumably the public will need to fund it, either from the general fund or via bonds. This cost should be included and analyzed to determine if increased revenues from the development will pay for the facility or if a general tax increase is necessary.

As the land use process progresses the City's responsible officials will determine what costs or improvements can be assigned to the project developer, which will be funded by the City's general fund, which will be funded by new bond issues (increased taxes), which will be funded by special purpose districts, etc. but unless all the capital facility and equipment costs are included and the bottom line cost accurately tabulated, the SEIS will not adequately disclose the true impacts and the public and city officials will not be adequately informed. The SEIS Fiscal analysis should include all costs required to serve the project.

Comments on TENW traffic report (Note: comments are provided on the transportation source document, but not specifically on the transportation section of the SEIS. However, all comments on the TENW traffic report should be construed to apply to the applicable sections of the SEIS proper)

H-02

General - The upper county is not a "typical" urban area. The economy, land use and traffic patterns of the upper county is primarily driven by recreational use and seasonal tourism. There are a number of statements in the Traffic report that imply that "standard" engineering assumptions for typical urban development are appropriate, and that busy weekend peak hours need not be mitigated because they are so short. Heavy seasonal and weekend recreational use IS the normal for the upper county against which impacts of the proposed project should be measured. I believe that the traffic impacts for weekday periods is somewhat overstated and that impacts during peak summer weekend periods are significantly understated. To the extent that the traffic analysis, and subsequent mitigation assumptions, are based on trip generation/distribution from "typical" urban areas that are non recreational/tourist oriented, they must be revised to focus on actual area patterns.

Page 5, paragraph 2: The report states "it is not standard traffic engineering practice to mitigate for traffic conditions that only occur for a few hours a week during the summer months". I don't believe this to be true, there are no specific engineering standards for mitigation. Requirements for mitigation vary by jurisdiction. The City of Cle Elum may (or may not) decide to mitigate specific project impacts after viewing the data. Regarding mitigation for short period impacts, if there was a standard or code as cited, then no stadium project, event, or other short but significant project would ever be required to mitigate its impacts. The report should remove references to engineering standards for mitigation.

Section 2.5 (1st paragraph) and Fehr memorandum (page 2) states the Kittitas County model was calibrated with 2019 weekday PM traffic counts, but the traffic counts, locations, dates and times gathered, do not appear to have been provided in the report. This information should be included for public review, as it is not possible to assess the validity of model predictions without this information. It is well known locally that there are intersections in the study area that currently operate at LOS F during peak summer periods when I-90 is at capacity. This does not appear to be reflected in the study as an existing baseline condition.

Section 2.5 (1st paragraph) states that traffic counts at intersections 21 - 24 were collected in December and then increased by 64 percent using WSDOT guidelines to estimate peak summer conditions. This is not accurate and significantly understates existing summer peak period traffic. Intersection 21 (Roslyn - Pennsylvania and 903) currently operates at LOS F during peak summer periods, not LOS C as shown. Current wait times significantly exceed the 17 to 20 sec stated in the report and so the impacts of the proposal in future years are understated. At peak times the traveling public uses local side streets to bypass congestion on 903 through Roslyn, causing impacts to Roslyn residents. The additional traffic from the proposed development will significantly worsen the situation. The SEIS consultant team should meet with City of Roslyn staff to verify existing conditions and update the models to accurately reflect existing conditions and accurately report project impacts.

Section 2.5 (1st paragraph) traffic counts at intersections 21 - 24: The upper county/Roslyn has numerous festivals, events and iconic businesses during the peak summer season that are major attractors that significantly affect traffic patterns, trip generation and parking needs during peak periods. These events have been going on for many years, some for decades, and are effectively part of the baseline. Surely the proposed development will similarly be attracted to these events and downtown Roslyn. The trip distribution in the SEIS does not appear to include this attractiveness, and the trip distribution to Roslyn during peak periods seems very understated. The SEIS consultant team should meet with City of Roslyn staff to verify existing model distributions and update to accurately reflect existing conditions and accurately report project impacts.

Section 2.5 Future 'Baseline' Traffic Volumes - The I-90 Snoqualmie Pass East widening project appears to be inducing more traffic and growth in the Upper County area (both permanent residents and recreational use), and with the next phase to Easton underway this is likely to accelerate. Do the traffic growth assumptions include this induced growth as baseline? What magnitude was assumed?

Section 2.6 Existing Intersection LOS, Table 7 - As noted above the LOS at intersection 21 is not LOS B. It

frequently operates at LOS F during peak summer periods.

Section 2.6, Page 25 last paragraph - The report states "it is not standard traffic engineering practice to mitigate for traffic conditions that only occur for a few hours a week during the summer months". See comment above, this statement should be removed from the report.

Pages 28 & 29, Future baseline conditions - Intersection 21 currently operates at LOS F. Report should be revised accordingly

Sections 3.4 & 3.17, Trip Generation: For both Alternatives 5 and 6 it appears that trip generation for the residential portion assumes typical Urban type development trip generation patterns where peak trips are to and from employment centers during PM peak hours. However, upper county does not follow typical Urban Development patterns as noted above. It is likely that either Alts 5 or 6 will contain significant amounts of "2nd houses" for weekend use and rental (unless prohibited by deed restriction). This weekend use pattern will drive up the trip generation to and from the site during the Friday and Sunday peak periods and so the analysis as currently completed may well understate the impacts of the proposal during these periods. The analysis should be revised accordingly.

For Alternative 6 RV resort see General Comments on RV Resort above. The parameters and statistics used to assess RV Resort impacts are based on much smaller RV parks. Additional data based on facilities of similar type and size should be provided to verify model assumptions.

For Alternative 6 RV resort, what is the basis for trip generation? I could not find a separate trip generation table for the RV resort in the report and it appears that weekend trips to the resort by RVs are understated. Unless specific studies are provided to the contrary, it would seem logical to assume that many, if not most, RV sites will turn over on weekends, significantly driving up the trips and impacts.

Before a new supermarket is built in the proposed commercial center (2031), the only full service supermarket in the upper county is Safeway at W 1st st and Douglas Munro Blvd. Being the only supermarket, it is a major traffic attractor and its "attractiveness" could be understated by standard ITE criteria. The effect is magnified by the recreational use patterns as many weekend visitors stop at the Safeway before continuing, to their ultimate destinations, particularly on Friday afternoon/evenings. Has this clearly known effect been included in the models? If the traffic analysis assumes that a supermarket in the commercial area will reduce offsite impacts then there should be a specific timeline and commitment by the developer to have the new supermarket constructed at a specific date. If the timing of a new supermarket will be allowed to be driven by market conditions, then the study should provide clear justification for any timing that is assumed.

Sections 3.2, 3.3, 3.14 & 3.15, Roadway Network, Site Access and Circulation: While the site is located in the City's urban growth area, it is essentially "disconnected" from the City proper. The SEIS should study the possibility of extending a new arterial road from the residential portion of the site directly to Douglas Munro Blvd. to provide direct connectivity to the City's primary Urban Area, businesses, services, a second access to I-90 as well as access to the future low cost housing site (which currently has no access point shown on the site plan). It would also reduce impacts to Roslyn, Ronald and other residences along 903.

Sections 3.6, 3.7, Future Intersection Volumes / LOS - The impacts at Intersection 21 (903 and Pennsylvania in Roslyn) are understated - see above

Table 23, Page 57, Site Access LOS Summary - Table 23 shows that every project entrance will fail during summer peak periods. Bullfrog Rd and 903 are critical ingress/egress roads for the region, for both residents and weekend visitors that come and go from I-90 to up valley areas. It is the "Front Door" to up valley areas. The traffic report should detail what these LOS failures actually mean for the traveling public headed up

valley but not going to the project, what level of congestion, length of queues and delays on the main road, etc, To the extent that new congestion on Bullfrog and 903 caused by the project makes it more difficult to proceed up valley this will result in significant impacts and should be disclosed (and mitigated). Congestion that degrades the experience of weekenders headed up valley WILL impact up valley towns and businesses.

Section 3.8 & 3.19 - Have WSDOT or Kittitas county been consulted about replacing stop controlled intersections on SR 903 and Bullfrog Rd with roundabouts to match existing facilities that abut the project? Current WSDOT guidelines generally show a preference for roundabouts at all new access points of major developments. Roundabouts at site access points should be included in the study.

Section 4 - Mitigation Measures: Impacts, and mitigations, for all weekend peak periods should be included (see above).

Contribution of funds based on the project's calculated proportional share of impacts is not adequate, or effective, mitigation unless the contribution is made to an actual Public Capital improvement project that is scheduled for construction prior to or concurrent with the timing of the impact (concurrency). Partial funding that does not result in road or intersection projects being caused to be built does not mitigate project impacts. To mitigate project impacts in fact and maintain a reasonable concurrency four options are available:

1. The project is responsible to construct the improvements necessary to maintain adequate levels of service on affected roads as the development is built out;
2. The project can partner with other developers or municipalities to construct necessary improvements in a timely way;
3. The project can wait until necessary improvements are constructed by others and road capacity actually exists to proceed;
4. If an affected jurisdiction has a Capital Improvement Plan that includes construction of necessary improvements, the project can contribute to it (and accelerate needed elements) so that improvements are concurrent with impacts. Note that any solution that includes the expenditure of public funds to construct improvements needed for the development to proceed and require new taxes to do so, constitutes a financial impact on the public that must be analyzed and disclosed in the SEIS.

The impacts to Intersection 21 (903 and Pennsylvania in Roslyn) are understated and mitigation by the project should be required. The developer and City should meet with the City of Roslyn officials to work out acceptable mitigation.

The project should be required to extend an arterial to Douglas Munro Blvd. to provide and alternative route from the project to the City center.

Table 23 shows that virtually every project entrance will fail to meet level of service criteria during summer peak periods causing significant congestion on adjacent roads, yet no mitigation is proposed. The project should be required to mitigate ALL impacts during peak periods. Roundabouts should be studied.

Comments on Sec 3.8 Aesthetics/Light & Glare

The developer is proposing a 100 ft buffer along most of the Bullfrog Rd. Corridor. For locations 3a, 3, 5 and 6 the SEIS states that views of the RV Resort ".... would be completely blocked ..... by the density of the existing trees associated with the approximately 100-foot on-site forested buffer that would be retained along the perimeter of the site in this area". This is factually incorrect. Views of the RV site will not be completely blocked by a 100 ft buffer. Evidence to this fact is available by just driving the corridor and looking through the trees. Additional evidence is that the Suncadia golf course is visible from Bullfrog Rd, in part, even though Suncadia provided a buffer of 400+ ft. of similar density trees. A better reflection of the impact of a 100 ft.

buffer between 47 degrees North and Bullfrog Rd. would be the existing development in the vicinity of the Fire District #7 fire station, which is clearly visible through the current 75 ft +/- tree buffer.

For locations #7 and #8 the SEIS states "Views of proposed development on the site (e.g., single-family residential uses) would be completely blocked from view by the intervening approximately 500-1,000-foot open space/buffer that would be retained along the perimeter of the site in this area. These view locations look across the 250 foot to 300 foot wide cleared power line corridor, so there is substantial reason to believe that this statement is factually incorrect. The SEIS should include a simulation or modelling of the view of the project from Bullfrog road in the vicinity of the power line crossing to accurately assess the impact on views.

The proposed 100 ft buffer cited in the mitigations section is not adequate to prevent adverse cultural and economic impacts. Additional buffer width and/or mitigation should be provided in the SEIS document.

Comments on Sec 3.11 Parks & Recreation

The SEIS Section 3.11-9 states:

RV resort visitors under SEIS Alternative 6 would also contribute to the need for regional, county, and local parks and recreational facilities, particularly because they are often coming specifically to use the area's recreational resources. However, since these visitors would not be permanent, year-round residents, and the entire proposed RV resort would be considered a recreational amenity, the RV resort visitors are not expected to place as great a demand on off-site recreational resources as the permanent population in the proposed housing.

The two sentences in this paragraph seem to be contradictory, if the RV visitors come specifically to use the area's recreational resources, why would they be expected to have less demand than the permanent population. Without backup data it could easily be argued that the reverse is true. The SEIS should provide specific analysis or data to determine the actual impacts of the RV Resort on area parks and recreational facilities.

Section 3.11 provides no analysis of impacts (and mitigations) on Roslyn and Ronald area recreation facilities, among which are Coal Miners Trail, the Roslyn Urban Forest Mountain Bike Trail system, the Towns to Teanaway trail system, as well as various Roslyn Festivals and events. Roslyn is a major tourist and recreational attractor amenity which will clearly be visited by the Residents and RV users in the proposed project. It is within the 1 mile radius, and the SEIS team made public commitments to analyze impacts to up valley towns. The SEIS should include analysis of these impacts. The developer and City should meet with the City of Roslyn officials to define the scope of analysis and impacts on Parks and Recreation facilities in Roslyn and discuss appropriate mitigation.

Lastly, I understand that the CIty proposes that comments to the SEIS will be addressed in the FSEIS. Considering the fundamental inadequacies in the SEIS outlined above, the lack of proposed mitigations, how mitigations will be funded, lack of data on elements of the project, etc, I request that the city do not proceed straight to FSEIS but rather that the City issue an amended SEIS for additional public review and comment. Given the size of the project, the magnitude of impacts to the region, the lack of clarity on proposed mitigations and who will fund them, it is only reasonable and fair for the public to have complete information on the proposal before it proceeds to the next step.

I appreciate the opportunity to make these comments, if you have any questions or need clarification please feel free to contact me. If you could drop a quick note to confirm the timely submittal I would greatly appreciate it.

Respectfully submitted,

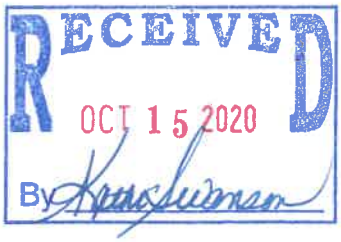
H-02

Tom Uren, P.E.
103 N "E" St
Roslyn WA 98941
206-947-2566

Letter L-100

SEPAResponsibleOfficial

From: Nancy Van Wert <nancyvanwert@gmail.com>
Sent: Thursday, October 15, 2020 8:48 AM
To: SEPAResponsibleOfficial
Subject: Community Center



City of Cle Elum:

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Nancy Van Wert
3581 Summit View Road
Cle Elum, WA. 98922
509-656-4323

Letter L-101 October 12, 2020

TO: SEPA Responsible Official
City of Cle Elum

RECEIVED
OCT 13 2020
By WP 12:29pm

FROM: JUDY WALDENMAIER
802 W. 6TH ST.
CLE ELUM WA 98922

The City of Cle Elum must immediately demand, in legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, for a Community Center to the City of Cle Elum. 1

Thank you for your immediate consideration of this urgent request.

Judy Waldenmaier

Mrs. Judy Waldenmaier
802 W 6th St
Cle Elum WA 98922

RECEIVED
OCT 13 2020
By WP 12:29pm

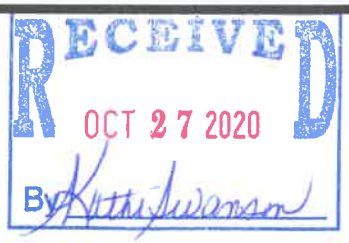
SEPA Responsible Official @
City of Cle Elum
119 W. First St.
Cle Elum WA
98922

H-02

Letter L-102

SEPAResponsibleOfficial

From: Joe and JoLynn Wallick <jojoe506@yahoo.com>
Sent: Tuesday, October 27, 2020 10:38 AM
To: SEPAResponsibleOfficial
Subject: Community center



"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

JoLynn Wallick
509-260-1681

Sent from Yahoo Mail on Android

Letter L-103

SEPAResponsibleOfficial

From: Wersland <wersfam10@gmail.com>
Sent: Tuesday, October 27, 2020 11:53 AM
To: SEPAResponsibleOfficial
Subject: Community Center



To Whom it may concern,

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. The need in our community is great. Do not let this go any longer. 1

Sincerely,

Christy Wersland

Kathi Swanson

From: Beth Willams
Sent: Wednesday, October 14, 2020 11:39 AM
To: Kathi Swanson
Subject: Fwd: Upper County Community Center, and Suncadia's obligation



Sent from my U.S.Cellular© Smartphone
Get Outlook for Android

From: Liz Wise <YoungWise@inlandnet.com>
Sent: Tuesday, October 13, 2020 3:48:13 PM
To: jglondo@cityofcleelum.com <jglondo@cityofcleelum.com>; kenr@cityofcleelum.com <kenr@cityofcleelum.com>; beth@cityofcleelum.com <beth@cityofcleelum.com>; steveharper@cityofcleelum.com <steveharper@cityofcleelum.com>; ruston@cityofcleelum.com <ruston@cityofcleelum.com>; mholz@cityofcleelum.com <mholz@cityofcleelum.com>; Mlundh@cityofcleelum.com <Mlundh@cityofcleelum.com>
Subject: Upper County Community Center, and Suncadia's obligation

Dear City Council member,

I am writing to communicate my belief that the City of Cle Elum must immediately demand, in good legal form, that Suncadia fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled. 1

Thank you for your attention,

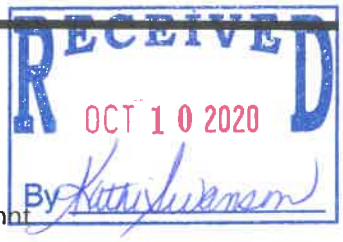
Elizabeth Wise
206 W Fifth St
Cle Elum, WA 98922

Letter L-105

SEPAResponsibleOfficial

From: Kathy Wyborski <wyborskikathy@yahoo.com>

Sent: Saturday, October 10, 2020 12:45 PM
To: SEPAResponsibleOfficial
Cc: Jay McGowan
Subject: Suncadia-City of Cle Elum Community Development Agreement



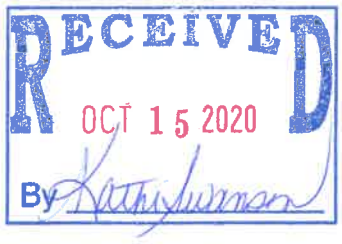
The city of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfil its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum. 1

Thank you for your attention in this matter,

Kathy Wyborski
231 Sagebrook Lane
Cle Elum, WA 98922
810.580.1314

Kathi Swanson

From: Jack Young <jyoung3006@gmail.com>
Sent: Tuesday, October 13, 2020 10:48 AM
To: Kathi Swanson
Subject: Suncadia obligation



Hi Kathi,
Would you be so kind and forward this note to our city council members for me.
I could not find a group mailing option on the city website.
Thanks!
Jack Young

Dear council members,
Please represent me and my neighbors and demand that Suncadia fulfill its obligation for a transfer of land to the city for a new community center and amenities as agreed to. You may have already addressed this situation, but I did not see it in past meeting minutes. Thank you, and know that your community is watching. 1

Jack Young
Cle Elum resident

Kathi Swanson

From: Alexandra Kenyon <Alexandra@kenyondisend.com>
Sent: Friday, October 16, 2020 11:15 AM
To: Kathi Swanson
Subject: RE: Suncadia obligation

Yes, I think that's appropriate. Happy Friday!

From: Kathi Swanson <kathi@cityofcleelum.com>
Sent: Friday, October 16, 2020 11:10 AM
To: Alexandra Kenyon <Alexandra@kenyondisend.com>
Subject: FW: Suncadia obligation

Hi, Alex;

When I receive these types of emails, is it appropriate to distribute it to council as requested? Thanks.

Kathi Swanson
CITY CLERK
119 W First Street
Cle Elum, WA. 98922
(509) 674-2262 ext. 103
kathi@cityofcleelum.com
www.cityofcleelum.com

From: Jack Young [mailto:jyoung3006@gmail.com]
Sent: Tuesday, October 13, 2020 10:48 AM
To: Kathi Swanson <kathi@cityofcleelum.com>
Subject: Suncadia obligation

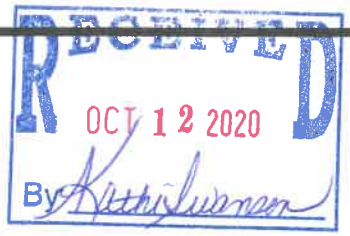
Hi Kathi,
Would you be so kind and forward this note to our city council members for me.
I could not find a group mailing option on the city website.
Thanks!
Jack Young

Dear council members,
Please represent me and my neighbors and demand that Suncadia fulfill its obligation for a transfer of land to the city for a new community center and amenities as agreed to. You may have already addressed this situation, but I did not see it in past meeting minutes. Thank you, and know that your community is watching.

Jack Young
Cle Elum resident

Letter L-107

SEPAResponsibleOfficial



From: Jock Young <jock_y@yahoo.com>
Sent: Monday, October 12, 2020 12:50 PM
To: SEPAResponsibleOfficial
Subject: Community Center

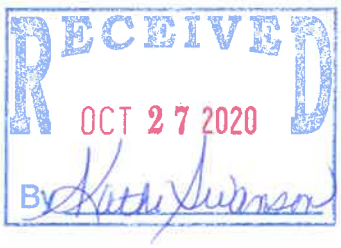
Please do what you can to see that the City of Cle Elum builds a community center on land from Suncadia with money from Suncadia. 1

Jock Young
206 W 5th St
Cle Elum WA 98922
509 304 8447

Letter L-108

SEPAResponsibleOfficial

From: Larissa Zepp <lstuder84@gmail.com>
Sent: Tuesday, October 27, 2020 12:43 PM
To: SEPAResponsibleOfficial
Subject: Community Center



"The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Elum. All discussions regarding Bullfrog Flats must cease until this obligation is fulfilled." 1

Larissa Zepp
Cle Elum

Betty J Zierke

706 W 5th St. Unit B

Cle Elum Wa. 98922

City of Cle Elum

119 W First St

Cle Elum, WA 98922

The City of Cle Elum must immediately demand, in good legal form, that Suncadia immediately fulfill it's obligations under the 2002 Bullfrog Flats Development Agreement by transferring 12 acres of land and $5.8 million, expressly for a community center, to the City of Cle Elum . 1

Sincerely,

Betty J Zierke

Property Owner

RECEIVED
OCT 13 2020
By WP 308

H-02

Betty Zierke
706B W 5th St.
Cle Elum, WA 98922-9702

YAKIMA, WA
9 OCT
202

FOREVER / USA

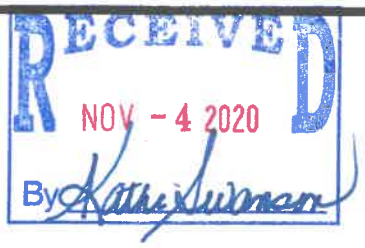
SEPA Responsible Official
City of Cle Elum
119 W First St
Cle Elum WA. 98922

RECEIVED
OCT 13 2020
By UD 308

98922$1105 C002

SEPAResponsibleOfficial

From: Mark Randleman <dr.randle1@icloud.com>
Sent: Tuesday, November 03, 2020 3:29 PM
To: SEPAResponsibleOfficial
Subject: Community Center



My name is Mark Randleman. 495 East 4th st. Cle Elum. We moved to Cle Elum in 1978 and raised our family here. I worked for the school district for 40 yrs. teaching the youth of our community. We need to negotiate very diligently as a city with Suncadia to perform on there responsibilities of land and monies for a community center. Quality operations are developed through trust in your people and community. There would be no better way to leave a positive impact on this community than to offer the opportunity of a community center. Suncadia knows this as they have been very generous in there support over the years. Let's make this work a priority and it will happen. 1
Thank you
Mark Randleman

Sent from my iPhone

Dedicated Phone Line Comments

VOICEMAIL TRANSCRIPT

Voicemail VM - 1

Trish Griswold

Hi, this is Trish Griswold. 203 Elk Haven Road Cle Elum Washington 98922. Griswoldtrish@gmail.com is my email and this may not be the appropriate place to do that but I tried to use the link on your site to email a response and it wouldn't send so I was gonna leave a message but then I just heard through this and maybe this is more of an opinion piece, but I am concerned over over-developing our area and we need trails close to the city and I'm thinking of those close to the cemetery in Cle Elum and also the Washington State horse park. They're well used. There was a grant that was advertised in the paper that we could've asked to purchase some. I contact both the city and I contact Suncadia and I wrote a letter to the editor and got no response from anyone but even at this time you know with COVID and all that, we really shouldn't be spending more time inside but raise opportunity outside so I'll be willing to do the Grant if somebody knew how to do that. Anyway I'm sorry if this is the wrong place to put this. Thanks bye.

1

Voicemail VM - 2

Jack Young

My name is Jack Young. I live at 307 North Wright Avenue in Cle Elum. My email address Jyoung3006@gmail.com. I am calling and asking the City of Clay Elum to demand that Suncadia fulfill its obligations under the 2002 Bullfrog Flats Development agreement and transfer the 12 acres of land and as well as the dollars that was indicated in that agreement for a Community Center here in Clay Elum. This project should not continue until that is done and that is my opinion and please stop this project and tell the Cle Elum, as agreed to, receives the acreage and the dollars. Thank you very much.

1

Voicemail VM - 3

Darryl Lester S. Chepoda

Hi, I'm Darryl Lester S Chepoda. I've lived here for over 82 years. 441 Pays Road. The reason I'm calling is in response to your ad in the paper concerning the community center. In the beginning, the community center where the location seems like it's awkward for town folks. It seems like it's more of an addition for Suncadia as opposed to the people of Cle Elum. I'm wondering in my own mind I'd like to see this development and I think it should be expediently handled and I can't understand why prior city attorneys didn't get that all transferred into the city as opposed to waiting this long. But anyway we're at that point now which I'd like to see it to get done like I said I don't think the spot for the community center is advantageous to us. Furthermore, I think Sundcadia should develop themselves into their own city. They do have signage on the highway indicating Sundcadia. I think they

1

should develop that into a city, have their own Police Department, and fire department. They made a nuisance on Bullfrog cut off. They made a nuisance in Roslyn with drunkenness and that sort of stuff. I just feel that they need to incorporate themselves as a city. Thanks. 1 cont'd

Voicemail VM- 4

Carolyn Jones

Yes, my name is Carolyn Jones and I am a resident of 511 West 6th Street in Cle Elum and I have lived here for 38 years. I am calling regarding the 47 North Project and I would like to express that the City of Cle Elum must immediately demand in good legal form that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development agreement by transferring 12 acres of land and 5.8 million expressively for a community center to the City of Cle Elum. My email address is gdckjones@gmail.com. Thank you. 1

Voicemail VM - 5

Shelly Watson

Hi my name is Shelly Watson. My address is 306 South 2nd Street, Roslyn Washington. My email jazzgrrrl@hotmail.com. The City of Cle Elum must immediately demand in good legal form that Suncadia immediately fulfill its obligations under the 2002 Bullfrog Flats Development agreement by transferring 12 acres of land and $5.8 million expressly for community center to the City of Cle Elum. Thank you and as far as bull frog flats that's very scary thing. I was evacuated three years ago with the fire and we only have one road in one road out. It is, that's a terrible thing to do to our community and water rights, where does that come from. Again, thank you very much. Bye bye. 1

Voicemail VM - 6

Jerry Hine

Yes, my name is Jerry Hine. I live at 615 East 3rd Street in Cle Elum and I want to make sure that before any action is taken on the EIS that be on the 47 North Development that Suncadia must live up to its developer agreement of 2002 and must surrender 12 acres and $5.8 million to the city prior to any action on 47 North. Thank you. 1

Voicemail VM - 7

Cathy Hayes

My name is Cathy with a C, last name Hayes. My address 423 Wapiti Drive, Cle Elum, 98922. My email address cahayes1947@gmail.com. And I'm calling to comment on the Bullfrog Flats development. I think that the City of Cle Elum, well it's the agreement with Suncadia 12 for 12 acres back in 2002. I think that the City of Cle Elum should immediately move forward with Suncadia to get the funds to build the Community Center. Thank you and have a great day bye bye. 1

Voicemail VM - 8

Carla Scoon

Hi my name is Carla Scoon. I live at 811 Columbia Avenue North in Cle Elum, Washington. My phone number is 509-312-7000. My email address is wolfsave@hotmail.com. And my comment is with regards to the agreement that was entered into over 18 years ago between Suncadia and the City of Cle Elum to provide a community center to the city of Cle Elum. This agreement involves transferring 12 acres of land and 5.8 million dollars in order to facilitate this community center. I am in support of it. I have been waiting for this a long time. I think it would be of great benefit to our community because we have youths here specially that needs a place to come together and meet to avoid meeting at other places without supervision and some youths are not involved in sports or they may not excel at their studies. However, they need social interaction, a place where they can come and be together. Plus, this would also aid the community in providing a place for community events. So, I would like very much for the City of Cle Elum and Suncadia to move ahead now before any other major changes are made by Suncadia and to perform in a legal agreement what they have agreed to previously. It's been 18 years and it's time to do something now legally to keep this contractual agreement. So they need to perform. The parties need to perform. That's what I am saying. And I thank you very much for this opportunity to speak. Thank you, goodbye. 1

Public Meeting Comments

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Public Meeting

Supplemental Environmental Impact Statement

October 22, 2020

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CITY OF CLE ELUM, WASHINGTON

47o NORTH MASTER SITE PLAN AMENDMENT
SUPPLEMENTAL ENVIRONMENTAL IMPACT STATEMENT
PUBLIC MEETING

October 22, 2020

6:00 p.m. - 6:48 p.m.

REPORTED BY: CRYSTAL R. McAULIFFE, RPR, CCR 2121

CLE ELUM, WASHINGTON; OCTOBER 22, 2020

6:00 p.m.

-o0o-

MS. TOOMEY: Welcome to the 47o North Master Site Plan Amendment, Supplemental Environmental Impact Statement Public Meeting. We will begin shortly.

Good evening, everyone. Welcome to the public meeting for the 47o North Master Site Plan, Supplemental Environmental Impact Statement. My name is Colleen Toomey, and I'm part of the project team supporting the City of Cle Elum.

Before we begin the presentation, I would like to walk through a few important items. We will have three segments tonight. First, a short presentation; second, a clarifying question-and-answer session; and third, a public comment period.

To reduce background noise and make sure things run smoothly, all attendees will be muted during the presentation and the Q&A portions.

Tonight everyone is participating through the Zoom platform. Here are the key features you need to know about.

You can adjust volume by clicking on the audio settings in the bottom left corner of your screen. If you can't hear us, well, try turning up the volume.

If you have a clarifying question about the supplemental EIS for our question-and-answer session, you can submit it through the Q&A window here at the bottom of your screen.

When you request a question, we request that you use short, complete sentences. This helps when we are reading the questions out loud for everyone.

If you are having technical issues with Zoom, please send us a message from the chat window at the bottom of your screen. We'll see if we can help fix your issues.

Please use this for technical issues only. Do not submit your questions or comments through this window. Otherwise, we will not be able to capture them for the public record.

We also have a call-in number for those who wish to listen along; that number is (253) 215-8782. Please use the meeting ID number 882-9008-2447.

We are -- if you are listening along or watching on Facebook Live, we're glad you could join us. We will not be able to take questions or comments from call-in participants or from Facebook, but we encourage you to submit comments through voicemail, mail, or e-mail.

Finally, by participating in this event, you

are consenting to being recorded in accordance with City law and public records practices. Any comments that are made will become public information and all public disclosure rules and regulations apply.

This meeting is one way you can provide comment on the supplemental EIS. We will do our best to give everyone a chance to comment through Zoom tonight; however, if we run out of time, again, you can also do so through the following way:

Leave a voicemail at our hotline at (509) 204-3035. The hotline will remain open through October 30th.

You may also submit a written comment by e-mail or mail. Written comments must be submitted by Monday, November 2nd at 4:30 p.m. The e-mail address is SEPA -- that's S-E-P-A -- Responsible Official at City of Cle Elum dot com.

The mailing address is SEPA -- again, S-E-P-A -- Responsible Official, City of Cle Elum, 119 West First Street, Cle Elum, Washington 98922.

Now, we would like to turn it over to Cle Elum Major Jay McGowan, who will kick things off.

Okay. Mayor McGowan, are you with us?

MAYOR McGOWAN: Yes, I'm with you. I don't see myself on the screen, but that's okay.

Thank you, Colleen.

Hi. And I would like to thank all of you that are participating in this virtual meeting about the proposed 47o North Project.

I wish we could be meeting in person tonight, but we can't. And your comments are important to us, so we're going to try something new and different.

Also, I wish to say that -- that the Commission on Presidential Debate had consulted us before we scheduled tonight's debate; so my apologies to those of you that are missing this debate.

If friends or family members are missing this meeting, please remind them that they can still submit comments by phone, letter, or e-mail. This will not be your only opportunity to comment on this project, but it's an important opportunity. So let's give it a try.

So thanks again. And now I think, Richard, are you going to go over tonight's agenda?

MR. WEINMAN: Yes, I will. Thank you, Mayor.

I would like to welcome everyone as well. I will introduce the other members of the panel for tonight's meeting, and then start moving us through the

agenda.

My name is Richard Weinman. I'm serving as the City's designated SEPA-responsible official for the 47o North SEIS. My role is to ensure that the requirements of the State Environmental Policy Act, that's abbreviated as SEPA, are followed; and that the Supplemental Environmental Impact Statement is thorough and complete.

The other members of the panel -- of the panel for tonight's meeting are, in alphabetical order, Gretchen Brunner with the firm EA Engineering. Gretchen is the project manager and the lead consultant for the SEIS. Her role tonight is primarily to listen to your comments.

Gregg Dohrn is a planning consultant and the designated City Planner for the 47o North Project. Gregg's role is to review the 47o North application when it is submitted, to prepare a staff report, and to guide the City through the review process for the project.

So tonight's meeting is focused on the SEIS and your comments on that document.

We want to first give you some background information about the proposal, about SEPA, and about how the City's process for reviewing development projects works. Gregg and I are going to present that

information.

Next we set aside 10 minutes for a question-and-answer session to respond to questions about the SEIS or the proposal, and that will be followed by a short break.

Then Colleen will describe the mechanics for using Zoom to comment at tonight's meeting.

When you give your comments, we ask that you be as specific as you can and tell us if you think anything is missing from the SEIS. If there are any errors or things that need to be corrected.

The final EIS, which I'll describe a little, will respond to all comments about the SEIS received tonight and received by mail or e-mail.

We do appreciate that you likely have opinions about the proposal, itself, and about lots of other things. And we want to assure you that there will be future opportunities in the form of meetings, public hearings, and opportunities to comment on the proposal itself.

I'll now turn it over to Gregg Dohrn.

MR. DOHRN: Great. Thank you very much.

Some of you may recall, but it was back in 2002 when the City Council approved a Master Site Plan for what at that time was called the "Bullfrog Flats

UGA" or Urban Growth Area.

But in 2002, the City Council approved a Master Site Plan. They approved a development agreement, and those two documents were supported by an Environmental Impact Statement that was prepared.

And since that time, the -- the Master Site Plan largely sat vacant or idle. And only in the last couple of years did it kind of come back to life. And Suncadia approached the City to say that they looked at selling a substantial portion of the property and the project to a -- another party, and that they would become development partners.

The City was subsequently introduced to Sun Communities, and Sun Communities then advised the City that they were looking at making or proposing modifications to the Master Site Plan. And the modifications were essentially to change the type and composition of housing in the project.

The original development called for the construction of up to 1,334 housing units, and Sun Communities had advised the City that they were looking at making revisions so that there would be in the vicinity of 707 housing units and 627 RV pads that would be within an -- an RV resort. So that was the basic changes that were being proposed.

And if we go to the next slide, then, please.

So this is a schematic of how that revised development might look. It includes, once again, the same areas along the river preserved as open space. You'll see that there is still the areas for housing over and near State Route 903. But the significant difference would be in the middle of the project in the area which would contain then an RV park resort. It would include a number of amenities and -- and, otherwise, the project is largely the same.

We should note that Suncadia would retain ownership of the area to be developed as a business park. And that's kind of the basic framework.

And so if we can go to the third slide, then.

And looking at the slides. Once again, you'll see the 1,334 units under the approved project. The proposed revisions, and you'll also note that in the process it has further been proposed that the area set aside for business parking, commercial development would be reduced.

When the City was advised that Sun Communities was looking at proposing these revisions, the -- the City -- reviewed the -- the scope of them,

went back to the development agreement that was approved in 2002, and concluded that those proposed revisions would constitute major revisions to the proposed development. And as a result, would have to submit an application for those -- for those revisions to the City. And it would go through a public review process and ultimately would be subject to review and approval by the City Council.

The City staff further concluded that given the -- the magnitude of the -- the potential changes and the fact that the original Environment Impact Statement was now, you know, 15, 16, 17, 18 years old, that it would be appropriate to have the original Environmental Impact Statement updated and then the proposed revisions evaluated, which has led to now to the preparation of this Supplemental Environmental Impact Statement that Richard described.

And so, Richard, do you want to continue the discussion, then?

MR. WEINMAN: Sure will.

So I would like to briefly explain what an -- what a supplemental EIS is, how it's going to be used, and how it fits into the City's process for reviewing a development project.

So some basics about the State Environmental

Policy Act, which is abbreviated as SEPA. What is it and what does it do?

SEPA is a 50-year-old state law that applies to all state agencies and applies to almost all decisions that they make, including development projects and most types of planning documents.

The purpose of SEPA is to require state agencies, including city councils and other decision makers to consider the environmental affects of the decisions that they are going to make before they act, what -- what impacts will occur from taking a particular action to the natural and built -- and human environments, and how can those impacts be avoided or reduced?

An Environmental Impact Statement or Supplemental EIS is a document that helps to answer those questions. It compiles and analyzes information about the type and extent of impacts to the environment that would occur as a result of taking action.

Most basically, it's a source of information. It's a source of information that city councils and other decision makers must consider before they approve condition or deny a project.

The SEIS itself, however, is not a decision. It doesn't approve or allow anything to happen, and it

does not need to be approved or certified. It is a source of information for making decisions.

So this graphic on the screen summarizes the basic steps in preparing an Environmental Impact Statement.

The first couple of steps represented by the gray and the green boxes are the decision by a SEPA responsible official and issuance of notice that an EIS or SEIS needs to be prepared. And it also requests comments from the public and agencies and tribes about the scope or what should be studied in that document.

That occurred for this project in October of 2019. And that included a scoping meeting that was held at the middle school and an opportunity to provide written comments.

After that the City issued a scoping summary, which identified all the comments that were received and the major issues that were raised in the comments, based on that, the City, as Gregg mentioned, determined that all environmental issues that were originally considered in the 2002 EIS for the UGA and Bullfrog Flats needed to be re-evaluated and updated because of the extent -- the amount of time that had passed, and that a supplemental EIS was the appropriate document to do that in.

The second step, which is where we are now, in the middle of the graphic, is preparation and issuance of the draft SEIS document, and then obtaining public comment on the document.

The SEIS was published September 17th, and the comment period extended for 45 days and ends on November 2nd.

So the final step is preparation of a final supplemental SEIS, which is the second document. Two documents, draft and final, together constitute the SEIS for the project. And that is the document that will accompany the project application in the land use approval process and will be reviewed by the City Council.

So the final EIS primarily responds to the comments that are submitted by agencies and the public, tonight, and in writing. It can also provide additional information, if that's appropriate, or correct errors in the Draft EIS. It can modify the proposal and add or modify alternatives or -- or add new alternatives.

But the prime part of that document is a response to your comments. So the Final EIS is expected to be issued this winter, 20 -- probably early 2021.

So the next slide shows the relationship of SEPA, which is shown in green on the right, to the land

use review process, which is in blue on the left. And what this shows is how the SEIS is really part of and integrated into the City's land use review.

In -- for this project as well, the information in the SEIS will become information that's used by the applicant to actually prepare an application. So he will be able to -- the applicant will be able to see the impacts and mitigation measures that are identified in the SEIS and will have the ability to adjust its site plan and focus its application in a way that can, you know, avoid and address the impacts in the -- identifying the SEIS.

So the other key part of the land use review process is that -- to note, is that there will be additional public hearings, additional notices on the application is submitted, and additional opportunities to comment.

MR. DOHRN: Richard?

MR. WEINMAN: Yes.

MR. DOHRN: If I could just add one thing and -- and further clarify.

Going back to the point, the City Council approved the Bullfrog Flats Master Site Plan in 2002. What Sun Communities is proposing is modifications to that Master Site Plan, and the Supplemental

Environmental Impact Statement will help us evaluate those proposed modifications.

The important point to keep in mind is that the Master Site Plan that was approved remains in effect until such time that the City Council approves modifications to it. And if the Council does not approve modifications to it, it remains in effect.

The development agreement, which is a contract between the City and Suncadia, remains in effect and is only changed if the City Council approves changes to it.

If the modifications that are proposed are to be approved, there would then be a new development agreement executed between the City and Sun Communities, which would be a contract that would obligate Sun Communities to perform certain measures as they implement the Master Site Plan, and there may be modifications to the development agreement with Suncadia to recognize that they have a reduced role.

But nothing changes with respect to the contract and, more importantly, to the development agreement until such time that the City Council indicates a willingness to potentially approve the proposed modifications.

So I want to kind of make sure that

everybody understands that the contract in place stays in place and only is changed if there is an -- an agreement by the City Council to do so. And -- and that will be important as we -- as we go forward.

And to reiterate, Richard, what you said, once Sun Community finalizes their plans using the information from the Supplemental Environmental Impact Statement, we will then go through a formal process, starting at the staff level, of reviewing and evaluating the proposed modifications.

There will be an opportunity for the public comment to comment then. And then following the preparation of a staff report that will be made available, the public will have another opportunity to review and comment. There will be a public hearing. And all of that information will be a part of the record that goes to the City Council.

So, Richard, your comment about this is an opportunity to -- to comment but not the only opportunity to comment; wanted to underscore that, because there will be at least two more opportunities, if not more, as we proceed.

MR. WEINMAN: Yeah. And just to tie what Gregg just said back to the SEIS.

For those of you who have taken a look at

that, one of the alternatives that is evaluated in the SEIS is a continuation of the -- and development of the site according to the currently approved Master Site Plan and development agreement. So that is -- so that is a possibility, and one that we're comparing to development of the site according to the modified Master Site Plan.

So with that, I'll turn it back over to Colleen to get us started with some questions from the attendees.

MS. TOOMEY: Thanks, Richard.

Okay. We will now take clarifying questions on the EIS, the land approval processes, and on the 47o North proposal. So please focus your questions on these topics.

You can, again, submit your questions through the Q&A window at the bottom of your screen. Please use complete sentences that are succinct.

Again, we're going to take your comment now, and then we will do public comment afterward. So please hold off on final comments until we get to the last part of the (audio disruption).

So Richard is going to read questions as they come through, and then the project team will answer.

We may not be able to answer every question, but please know that our Zoom platform automatically documents every question, so we will have a record of it.

MR. WEINMAN: Before we get into the -- the question that was submitted, let me -- I'd like to briefly address one comment and question that we've been hearing and receiving, you know, for the past several days.

You may have read or heard -- well, there's a lot of interest in the community of questions about what's happening with the recreation center, you know, where -- where's that site? Where's the project? What's happening? And we know there's a high interest and concern about that in the community.

And, coincidentally, just yesterday, I believe, the City did receive communication and a -- I guess I'll call it an offer from Suncadia for a way to proceed with that. We do not know the details of that. That is still confidential. The City Council will be discussing that next week, I believe, in an executive session. And as soon as they are able to communicate what the status of -- what the substance of that offer is and what the status of that requirement of the existing development agreement is, they will communicate

it to residents. But we do not have any additional information about that.

MR. DOHRN: And, Richard, if I could just clarify. Just to be clear, actually, the City has not formally received the letter in the proposal yet. It has been described to the -- to the Mayor, in general terms, but the City hasn't received the letter yet.

So we really -- we don't want to get out ahead of Suncadia or the Mayor and the Council. But, in fairness, the Council hasn't even -- the City hasn't received it; so the Council hasn't even had a chance to review it.

But as soon as we get the letter, which we understand is forthcoming, the Council and the Mayor will immediately review it and will use the City's website to keep everybody posted on -- on the developments.

But I just wanted to be clear that it's -- it has been described but not received. And so we don't want to -- to get ahead of ourselves yet.

MR. WEINMAN: Okay. Moving on to the first question.

What will happen with my comments and when will responses to my comments be provided?

So, the Final EIS is the vehicle for

responding to all comments that are received on the draft. So the -- the comment letter or transcript of this meeting containing a -- a comment -- I'm not sure if we mentioned at the beginning that we have a court reporter who is recording this meeting and will prepare a transcript of the meeting that will become part of the Final EIS. The recording of this meeting will also be available for viewing on the City's website.

So the comment, itself, will physically be included in the final EIS. There will be a picture, a PDF, of the comment letter. And if it contains one comment, there will be a response, either on a facing page or somewhere in the document that will respond to that comment.

It may respond to that specific comment individually. It will respond to Ms. Smith, comment about police service. And we'll provide an answer to the question if we can.

I mean, it can respond to specific questions that relate to information in the SEIS.

It can't respond to expressions of opinion about the project. I mean, if the comment is I don't like this project, it should go somewhere else. Or I love this project, build it faster. Those are not SEIS issues.

We can respond to questions or comments about transportation, about any of the environmental issues that are included in the SEIS.

So that will appear in the final SEIS document, itself. We're not going to -- we don't reply to those or respond to those individually as they come in. We do it all at one time. And it's all published in the Final SEIS document, which we expect to be issued in -- sometime during the winter.

Any other questions to start?

Okay. Colleen, do you want to take it? Do you want to leave it open for a few more minutes or move on?

MS. TOOMEY: Well, if we don't have any more questions, I think what we can do is go ahead and take a five-minute break.

If you are registered to give public comment tonight, please be ready to give your comment when we return. Just as a reminder, you can submit your comments by voicemail, e-mail, or mail.

You'll see we have a timer going on here on the screen for five minutes. So we'll take a break and we'll come back and do our public comment period.

(A break was taken from to 6:35 p.m. to 6:39 p.m.)

MS. TOOMEY: Okay. Welcome back.

We are moving to the public comment period. We will be able to take comment until 8:30 p.m. If we run out of time, again, you can provide your comments through voicemail, e-mail, or mail.

So here's how we're going to do things tonight. Participants have preregistered to provide comment. You must be logged into the Zoom platform so we can first identify speakers and then unmute and mute speakers for comment.

I will call your name, and then I'm going to note who is next in line.

So a member of our team is going to invite you to speak. You will get a notification on your screen similar to what you are seeing here on the PowerPoint slide to unmute yourself. You need to first unmute yourself before you can speak. You will have three minutes to speak.

Please start by providing your full name and your physical address for the record. There will be a timer on the screen. When three minutes -- when time is up, we will move on to the next speaker.

So we start with those who have checked the box for public comment on their meeting registration. We pulled this list at 5:30. So if you registered after 5:30, we may not have your name on the list yet.

But that's okay. When we get through everyone, we will be able to take additional comments, and we'll give you some guidance on how to raise your hand to do that when we get to that point.

So again, this meeting is being recorded in accordance with City law and public records practices. Any comments that are made will become public information, and all public disclosure rules and regulations apply.

Okay. So we'll move to the next slide. I am pulling up our registrant list. So the first person that we are looking for tonight for public comment is Linda Wood. We are looking for Linda on our registrant list. You were the first speaker.

Linda, if you are there, can you send us a chat to let us know. We'll come back to you. But you are not seeing you on our list yet.

Okay. So the next person is Roger Beck. And then after Roger Beck will be Nicolas Webb.

Okay. So, Roger, you are being unmuted.

Please state your name and your physical address first. And your time begins as soon as you start speaking.

Public Meeting PM-1

MR. BECK: Roger Beck, 420 Black Nugget, Cle Elum.

Actually, Gregg covered the main comment that we wanted to make, which is that we have reached an agreement between Sun Communities and Suncadia to -- to work with the City and try and -- not try, but to make an offer to get us through the planning process for both -- both 47o North and also the recreation center.

I'd say there is still a -- a bridge that needs to -- a gap that needs to be bridged in order for us to -- to -- to provide funding, but we're -- I think that we have made a reasonable offer to the City or in the process of making a reasonable offer to the City.

So I wanted to get that one -- that issue moving forward, and -- and with Sun Communities' cooperation and hopefully with the cooperation, presumably with the cooperation of the City, I think we'll be able to get there.

So thank you.

MS. TOOMEY: Thank you, Roger.

Okay. The next person on our list that we were looking for is Nicolas Webb. Nicolas, we are looking for you on the Zoom registrant list here. If you are on here, please shoot us a note in the chat so that we know you are here.

So we have three people pre-registered.

Thanks, Roger, again for your comments.

1

Hopefully, we'll get to hear from Nicolas.

If anyone else would like to give comments right now who hasn't been named, what you can do is use the raised hand feature that is either next to your name or at the bottom of your screen.

So will you just use the same process. I'm going to call on you as I see you on the list with the raised hand. Our team will invite you to speak. You'll unmute yourself, and you will have three minutes.

So just give us a minute for us to check our list to see if we see some raised hands.

Okay. Well, it does not look like we have any hands raised for public comment. And doesn't look like we have Nicolas on the meeting with us.

So with that, I will just turn to it back over to Richard and Gregg, if you have any closing comments that you want to say about the project. And then I'll just do a final reminder of how people can comment on the project. We're going to leave that information up for you.

So Richard and Gregg, anything that you would like to share.

MR. WEINMAN: Are there any additional questions out there, since we have some time, about the SEIS?

MR. DOHRN: Richard, I would just like to reiterate that in addition to the different ways to comment, that we will be updating the -- the website or web page on a regular basis, and that will be the best ongoing source for information.

So as new information is submitted to the City, or there are new developments or activities, those will be posted on the web page. So if you're accustomed to that, that will be the best source of information.

Some of you, like myself, who have challenges using computers and all these new technologies, you can always leave a telephone message or send an e-mail to City Hall and -- and somebody can answer your questions as well on an ongoing basis.

But we'll do our best to use the web page as the primary way of keeping everybody informed as we proceed.

MR. WEINMAN: Well, thank you for attending, for making a difficult choice between this and anything else. And we look forward to your comments and addressing them in the Final SEIS.

MR. DOHRN: Yes, thank you.

MS. TOOMEY: Okay. Thank you, Richard, Gregg, all of our panelists. And thank you to all of you participants for being here.

That concludes our evening. We will leave up the public comment information on the slide for a couple more minutes.

We just want to thank you for your patience with this project, being a part of the public process. And hope you have a good night and stay healthy.

(Public Meeting concluded at 6:48 p.m.)

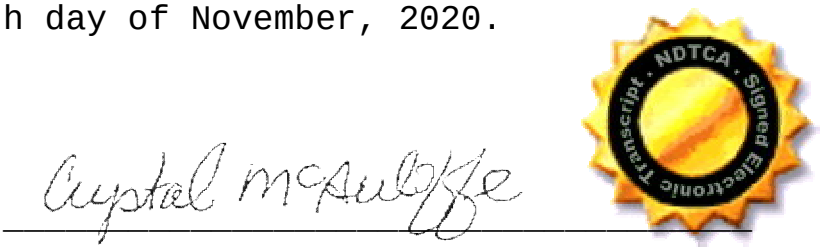
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C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF KITSAP)

I, CRYSTAL R. McAULIFFE, a Certified Court Reporter in and for the State of Washington, do hereby certify that the foregoing transcript of the videoconference public meeting on OCTOBER 22, 2020, is true and accurate to the best of my knowledge, skill and ability.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 4th day of November, 2020.



CRYSTAL R. McAULIFFE, RPR, CCR #2121

Chapter 5

ACRONYMS & ABBREVIATIONS

CHAPTER 5
ACRONYMS & ABBREVIATIONS

Acronym/Abbreviation	Full Name
A	
ACS	(U.S. Census) American Community Survey
ADA	Americans with Disabilities Act
ADD	Average Daily Demand
AM	Ante Meridiem (Before Mid-day)
APC	Advanced Practice Clinician
AV	Assessed Value
B	
BLS	Basic Life Support
BMP	Best Management Practice
BOD	Biochemical Oxygen Demand
BOR	(U.S. Department of Interior) Bureau of Reclamation
BPA	Bonneville Power Administration
C	
CAO	Critical Areas Ordinance
CARA	Critical Aquifer Recharge Area
CC&R	Covenants, Conditions, and Restrictions
C&D	Construction and Demolition
CEMC	Cle Elum Municipal Code
CESCL	Certified Erosion and Sedimentation Control Lead
CFL	Compact Fluorescent Lamp
CO	Carbon Monoxide
CO_2e	Carbon Dioxide Equivalent
COVID-19	Corona Virus
CPSM	Center for Public Safety Management
CWA	Clean Water Act
CY	Cubic Yards
D	
DAHP	(Washington State) Department of Archaeology and Historic Preservation
DEIS	Draft Environmental Impact Statement
DNR	(Washington State) Department of Natural Resources
DO	Dissolved Oxygen
DOE	(Washington State) Department of Ecology
DOH	(Washington State) Department of Health
DPS	Distinct Population Segment
DS	Determination of Significance
DSEIS	Draft Supplemental Environmental Impact Statement
DU	Dwelling Unit
E	
E.G.	Exempli Gratia (For Example)
EIS	Environmental Impact Statement
EMS	Emergency Medical Service
EMT	Emergency Medical Technician

Acronym/Abbreviation	Full Name
ERU	Equivalent Residential Unit
ESA	Endangered Species Act
F	
FEIS	Final Environmental Impact Statement
FSEIS	Final Supplemental Environmental Impact Statement
FAR	Floor Are Ratio
Ft.	Foot
FTE	Full Time Equivalent
G	
GBI	Gross Business Income
GHG	Greenhouse Gas
GMA	(Washington State) Growth Management Act
GPD	Gallons Per Day
H	
HCA	Habitat Concentration Area
HCM	Highway Capacity Manual
HSPF	Hydrologic Simulation Program - Fortran
HUD	(U.S. Department of) Housing and Urban Development
I	
I-90	Interstate 90
IBC	International Building Code
ICE	Intersection Control Evaluation
ICMA	International City Manager's Association
I.E.	Id Est (That Is)
IFC	International Fire Code
In.	Inch
IPaC	Information for Planning and Consultation
ITE	Institute of Transportation Engineers
J	
K	
KITTCOM	Kittitas County 911
KSWP	Kittitas County Solid Waste Management Plan
L	
LDRP	Labor Delivery and Recovery Patient
LED	Light-emitting Diode
LID	Low Impact Development
LOS	Level of Service
LSP	Landscape Stewardship Plan
M	
MDD	Maximum Daily Demand
MHI	Median Household Income
MPR	Master Plan Resort
N	
NAAQS	National Ambient Air Quality Standards
NO_2	Nitrogen Dioxide
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NW	Northwest

Acronym/Abbreviation	Full Name
O	
OFM	(Washington State) Office of Financial Management
P	
PHS	Priority Habitat and Species
PM	Post Meridiem (After Mid-day)
PM10	Fine Particulate Matter Under 10 Micrometer in Size
PSE	Puget Sound Energy
PMRV	Park Model Recreational Vehicle
Q	
R	
REET	Real Estate Excise Tax
RIDGE	Roslyn-based Conservation Group
RN	Registered Nurse
RM	River Mile
RV	Recreational Vehicle
S	
SEIS	Supplemental Environmental Impact Statement
SEPA	State Environmental Policy Act
SGCN	Species of Greatest Conservation Need
SR	State Route
SWAP	(Washington) State Wildlife Action Plan
T	
TSS	Total Suspended Solids
U	
V	
W	
WAC	Washington Administrative Code
WDFW	Washington State Department of Fish and Wildlife
WHR	Washington Heritage Register
WSDOT	Washington State Department of Transportation
WSHP	Washington State Horse Park
WWTP	Wastewater Treatment Plant
X	
Y	
Z	

Chapter 6
REFERENCES

CHAPTER 6
REFERENCES

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Chapter 7

DISTRIBUTION LIST

CHAPTER 7
DISTRIBUTION LIST

Tribes

Colville Tribe (2)
Snoqualmie Tribe (2)
Yakama Nation (6)

Federal Agencies

Bonneville Power Administration
Federal Highway Administration
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
U.S. Forest Service
U.S. Postal Service

State Agencies

Washington State Department of Archeology & Historic Preservation (2)
Washington State Department of Commerce (2)
Washington State Department of Ecology (4)
Washington Department of Fish and Wildlife (2)
Washington State Department of Natural Resources (3)
Washington State Department of Transportation (3)

County

Kittitas County Commissioners (3)
Kittitas County Fire District #6
Kittitas County Fire District #7
Kittitas County Hospital District #2
Kittitas County Housing Authority
Kittitas County Parks and Recreation District #1
Kittitas County Planning Department
Kittitas County Public Health (2)
Kittitas County Public Works Department
Kittitas County Sheriff (2)
Kittitas County Solid Waste
Kittitas County Waste Management

City

City of Cle Elum Mayor
City of Cle Elum City Council (7)
City of Cle Elum Planning Commission (6)
City of Cle Elum Administrator/Building Official
City of Cle Elum Librarian

City of Cle Elum Assistant Librarian
City of Cle Elum Attorney
City of Cle Elum Clerk (2)
City of Cle Elum City Planner
City of Cle Elum Public Works Director
City of Cle Elum Utility Clerk
City of Cle Elum Office Assistant
City of Cle Elum Treasurer
City of Cle Elum Fire Chief
City of Cle Elum Police Chief

Other Local Governmental Agencies

City of Ellensburg (2)
City of Roslyn (5)
Town of South Cle Elum (3)

Other Local Non-Governmental Agencies

AARF Animal Shelter
Cle Elum-Roslyn School District #404 (4)
Chamber of Commerce
Futurewise
Hopesource (2)
Inland Networks
Kittitas Valley Healthcare
Mountains to Sound Greenway
Puget Sound Energy (3)
The Nature Conservancy
Washington State Horse Park Association
Cle Elum Downtown Association

Newspapers & Libraries

Ellensburg Daily Record
Northern Kittitas County Tribune (3)
Inland Networks

Companies

Atwell (3)
Sun Communities (2)
Suncadia (2)
Shoemaker
Transpo Group

Individuals

Jeff Adams
Nancy Adelson
John Aguiler
Jordan & Nichole Ahola
Connie Anderson
Ira Astrachan
Laurie Bailey
Jane Baldick
Dawn & Guy Bass
Melissa Bates
Mike Bates
Mike & Darcy Bator
Melissa Becker
Lisa Belden
Ellie Belew
Fred & Lisa Benson
Gary Berndt
Tim Berndt
Jessica Berry
Danielle Bertschi
Irene Bjorkland
Penny Blackburn
Brandy Bogart
Corinna Bolender
Stacy Bradshaw
Greg & Deena Bramme
Bonnie Brandt
Keith Brandt
Richard Breckenridge
Bob Brencic
Lynn Brewer
Danielle Bricker
Barbara Brim
Lisa Bronkema
Susan Bronkhurst
Lisa Browitt
Bryce Brown
Nick Burson
Kathi Butorac
Mike Butorac
Mike Canady
Tony Carosino
Amy Casto
Aimee Castor
Tyson Chester
Tiffany Christman
Bret Clark
Gwen Clear
Bill Clos
Chris Collins
Art Colts
Catherine Cook
Peggy Cooke
Diane Cowger
Spencer Crabb
Adam Crawford
Deidre Cullers
Diedre Cullers
Nancy Daniel
Michael Day
Maya DeKnikker
Carrie Desanto
Gretchen Ditsworth
Leslie Ditsworth
Ed Doern
Larry Donovan
Deborah & Stephen Dowd
Steve Dowd
Sandra & Bill Dumont
Carlene Dunham
Ashley Dunn
Freida Ellison
Theresa Ellison
Jon Elward
Soderstrom Family
Patti Fersch
Rick Fersch
Marcie Fox
Bobbie Frankenfield
Christine Frankenfield
Henry Fraser
Brian Frederick
Elizabeth Frederick
Brian Fredrick
Ann Fuller
Patricia Garris
Mike & Charlotte Gavin
Trevor Gilbert
Linda Gimit
Jim Golubiec
John Golubiec
Glenna Green
Elizabeth Greenhawe
Susan Grindle
Patricia Griswold
Patricial Griswold
Marilyn Gruber
Laurie Haberman
Judy Hallisey
Lyndsey Halte
Mark Hammon
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Appendices

Appendix A – Transportation Analysis Addendum Memo

Appendix B – Updated Cultural Resources Report

Appendix C – Updated Supplemental Engineering Technical Report

Appendix D – Updated Plants, Animals, and Wildlife Memo

Appendix E – Updated Fiscal Conditions Memo

Appendix A

TRANSPORTATION ANALYSIS ADDENDUM

47° North Final SEIS

Cle Elum, WA

TRANSPORTATION ANALYSIS ADDENDUM

April 2021

TENW

Transportation Engineering NorthWest

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Table of Contents

INTRODUCTION 3

AFFECTED ENVIRONMENT 4

Traffic Volumes 4
Existing Traffic Volumes 4

Intersection LOS 4
Existing Intersection LOS 4

Future 'Baseline' Intersection LOS 8

Collision History and Traffic Safety 13

IMPACTS OF THE SEIS ALTERNATIVES 15

Future Year Intersection LOS with SEIS Alternative 5 and Alternative 6 15

Future Year Site Access LOS with SEIS Alternative 6 22

MITIGATION MEASURES 24

Introduction 24

Costs of Mitigation Measures 25

Mitigation Measures for 'Baseline' Conditions 27

Mitigation Measures for SEIS Alternative 6 27

Comparison of Mitigation Measures identified in FSEIS vs DSEIS 27

Revised Trip Generation for SEIS Alternative 6 based on 47° North RV Resort Occupancy 28

Application of Proportionate Share Mitigation 30

Methodologies for Determining Pro-Rata Share of Mitigation 30
Determining Pro-Rata Share as a Result of 'Baseline' Conditions 31

Determining Pro-Rata Share for Intersections Requiring Mitigation with SEIS Alt 6 31

Site Access Mitigation Measures 32

Other Mitigation Measures 33
Traffic Monitoring Program 33

Construction Management Plan 34

Trail System and Sidewalks 34

SIGNIFICANT UNAVOIDABLE ADVERSE IMPACTS 35

Appendices

Appendix A – Raw Traffic Counts

Appendix B – Trip Generation Calculations for SEIS Alternative 6 with 50% RV Resort Occupancy

Appendix C – Detailed Pro-Rata Share Calculations (Method A and Method B)

List of Tables

Table 1 EXISTING (2019) INTERSECTION LOS SUMMARY 6

Table 2 FUTURE 'BASELINE' INTERSECTION LOS SUMMARY – WEEKDAY PM PEAK HOUR (SUMMER) 9

Table 3 FUTURE 'BASELINE' INTERSECTION LOS SUMMARY – FRIDAY PM PEAK HOUR (SUMMER) 10

Table 4 FUTURE 'BASELINE' INTERSECTION LOS SUMMARY – SUNDAY PM PEAK HOUR (SUMMER) 11

Table 5 COLLISION DATA SUMMARY (2015 TO 2019) 14

Table 6 SEIS ALTERNATIVE 6 INTERSECTION LOS SUMMARY – WEEKDAY PM PEAK HOUR (SUMMER) 16

Table 7 SEIS ALTERNATIVE 6 INTERSECTION LOS SUMMARY – FRIDAY PM PEAK HOUR (SUMMER) 17

Table 8 SEIS ALTERNATIVE 6 INTERSECTION LOS SUMMARY – SUNDAY PM PEAK HOUR (SUMMER) 18

Table 9 SEIS ALTERNATIVE 6 SITE ACCESS LOS SUMMARY [1] 22

Table 10 SUMMARY OF MITIGATION MEASURES AND PRELIMINARY ESTIMATED PRO-RATA SHARE FOR SEIS ALTERNATIVE 6 26

Table 11 SEIS ALTERNATIVE 6 – WEEKDAY PM PEAK HOUR TRIP GENERATION COMPARISON WITH 100% vs. 50% RV RESORT OCCUPANCY 29

Introduction

The *47° North Draft SEIS Transportation Analysis* (TENW, September 2020) was prepared to support the 47° North DSEIS and provided a detailed analysis of the potential transportation impacts of the proposed 47° North development. The transportation analysis included an analysis of baseline conditions, SEIS Alternative 5 (Approved Bullfrog Flats Master Site Plan), and SEIS Alternative 6 (Proposed 47° North Master Site Plan Amendment) conditions for three future development years (2025, 2031, and 2037) and three time periods (weekday PM peak hour, Friday PM peak hour, and Sunday PM peak hour, all during the summer). The *47° North Draft SEIS Transportation Analysis* also identified potential mitigation and estimated pro-rata share contributions for roadway improvements necessary for SEIS Alternatives 5 and 6 to meet LOS standards for the weekday summer PM peak hour.

This *Transportation Analysis Addendum* is an update to the *47° North Draft SEIS Transportation Analysis* and addresses transportation-related comments received on the Draft SEIS as part of the public comment period on that document. The Mitigation Measures section of this *Transportation Analysis Addendum* (section 4) has also been updated to recalculate trip generation for SEIS Alternative 6 based on revised projected occupancy data for the RV resort during the weekday summer PM peak hour; revised pro-rata share mitigation tables are also included with an alternative pro-rata share method, for comparison with the method used in the DSEIS. Additionally, the Mitigation Measures section identifies potential improvements at the site access intersections and study intersections anticipated to operate at non-compliant levels of service (LOS) in the future with the 47° North project.

Affected Environment

Section 2 has been updated to reflect LOS C as the adopted standard for the study intersections under WSDOT jurisdiction and to summarize additional information on the severity of historical collisions at the study intersections.

Traffic Volumes

Existing Traffic Volumes

Existing traffic volumes were collected at the 27 study intersections by All Traffic Data in August and December 2019. The detailed traffic data sheets are included in **Appendix A**.

Intersection LOS

There are two state routes in the vicinity, Interstate 90, and State Route 903, for which the LOS standard established by WSDOT is LOS C, rather than D as identified in the Draft SEIS.

State, regional, county and City plans reviewed for the DRAFT SEIS identify varied, and sometimes inconsistent, level of service standards for roads within the study area; the applicable LOS sometimes depends on whether a location is defined as "urban" or "rural" and which governmental entity has jurisdiction for roads. The *Transportation Element of the City of Cle Elum Comprehensive Plan* (May 2019) identifies a standard of LOS C for City streets. The *Kittitas County Comprehensive Plan* (June 2019) identifies LOS D as the minimum acceptable LOS for intersections in urban growth areas, including Bullfrog Road, and LOS C as the minimum acceptable LOS for intersections in rural areas. However, WSDOT, the agency with jurisdiction for I-90 ramps and SR 903, distinguishes between urban and rural areas based solely on population size, irrespective of whether a facility is within an incorporated city or a designated urban growth area. WSDOT uses a 7,500 population as the threshold for an urban designation; since the City of Cle Elum population is less than 7,500 people, WSDOT characterizes the City as "rural" and applies LOS C[1]. The *47° North Draft SEIS Transportation Analysis* (TENW, September 2020) assumed that Cle Elum was considered an urban area, since it is a City and within an urban growth area, and applied WSDOT's LOS urban standard of LOS D. The Final SEIS applies the rural LOS C standard to the WSDOT intersections.

Existing Intersection LOS

Intersection LOS analyses were conducted at the study intersections for existing (2019) conditions during the weekday PM peak hour, Friday PM peak hour, and Sunday PM peak hour during the summer peak period. The summary of the existing intersection LOS analysis is included in **Table 1** below and the LOS results are discussed in detail following the table.

It should be noted that **Table 1** has been updated to reflect WSDOT's LOS C standard for study intersections on state routes. As a result, study intersections currently operating at non-

[1] Based on information provided by WSDOT Central Region on 11/18/20 and 12/2/20.

compliant LOS (LOS D, E, or F for City and WSDOT intersections, and LOS E or F for Kittitas County intersections) are shown in bold text in **Table 1**. Study intersections currently operating at non-compliant LOS based on the LOS C threshold for WSDOT intersections that were not identified in the DSEIS are shown as underlined, italicized, and bold text in **Table 1** in this *Addendum.* Refer to Footnote 1 following the table.

It should be noted that although **Table 1** in this *Addendum* has been updated to reflect the LOS C standard for WSDOT intersections and identify noncompliant intersections, the LOS and delay summarized in the table are the same as documented previously in **Table 7** of the *47° North Draft SEIS Transportation Analysis*. New or revised LOS evaluations were not necessary.

Table 1
EXISTING (2019) INTERSECTION LOS SUMMARY

		Existing Conditions (Summer Peak)					
		Weekday PM Peak Hour		Friday PM Peak Hour		Sunday PM Peak Hour	
Study Intersection	LOS Standard	LOS[1]	Delay[1]	LOS[1]	Delay[1]	LOS[1]	Delay[1]
Signalized							
14. S Cle Elum Way / Stafford / W 1st St	C	B	10.2	B	12.8	B	11.2
16. N Oakes Ave / W 1st St (SR 903)	*C*	A	7.9	A	9.6	A	13.1
18. Pennsylvania Ave / 1st St (SR 903)	*C*	A	6.0	A	5.4	A	7.8
Roundabout							
4. Bullfrog Rd / Suncadia Trail	D	A	4.4	A	5.4	B	12.2
6. Bullfrog Rd / W 2nd St (SR 903)	*C*	A	5.3	A	7.0	B	13.6
All-Way Stop-Controlled							
17. Pennsylvania Ave / 2nd St	C	A	8.4	A	8.4	A	8.2
Two-Way Stop-Controlled [2]							
1. Bullfrog Rd / I-90 EB Ramps	*C*	B	12.0	C	16.0	B	10.6
2. Bullfrog Rd / I-90 WB Ramps	*C*	A	9.6	B	11.9	B	10.1
3. Bullfrog Rd / Tumble Creek Dr	D	B	11.2	B	11.7	C	20.1
5. Bullfrog Rd / Firehouse Rd	D	B	11.9	B	13.1	C	20.0
7. Denny Ave / W 2nd St (SR 903)	C	B	13.6	C	15.4	C	21.6
8. Ranger Sta Rd / Miller / W 2nd (SR 903)	*C*	C	16.4	C	22.4	**E**	**35.8**
9. N Pine St / W 2nd St (SR 903)	*C*	B	13.4	C	19.9	***D***	***29.5***
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	7.7	A	8.2	A	7.3
11. Douglas Munro Blvd / W 1st St	C	**D**	**33.1**	**F**	**90.4**	**D**	**29.2**
12. Pine St / W 1st St	C	**D**	**27.8**	**D**	**30.7**	**E**	**35.0**
13. N Stafford Ave / W 2nd St (SR 903)	*C*	C	16.6	C	19.1	**F**	**51.6**
15. N Oakes Ave / W 2nd St (SR 903)	*C*	B	13.0	B	13.9	***D***	***33.9***
19. Oakes Ave / I-90 EB Off-Ramp	*C*	A	8.9	A	9.0	B	11.3
20. Oakes Ave / I-90 EB On-Ramp	*C*	A	0.0	A	0.0	A	0.0
21. SR 903 / E Pennsylvania Ave	*C*	B	12.5	B	10.2	B	11.0
22. SR 903 / Pacific Ave	*C*	A	9.8	A	9.2	A	9.5
23. Rock Rose Rd / Morrel Rd / SR 903	*C*	A	9.5	A	9.0	A	9.5
24. SR 903 / SR 903 Ramp	*C*	*Only analyzed for Sunday PM peak hour*				**F**	**> 100**
25. White Road I/C / I-90 WB Ramps	*C*	*Only analyzed for Sunday PM peak hour*				B	13.7
26. White Road I/C / I-90 EB Ramps	*C*	*Only analyzed for Sunday PM peak hour*				A	9.0
27. SR 970 / SR 970 Ramp	*C*	*Only analyzed for Sunday PM peak hour*				**F**	**59.4**

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, underlined and italicized indicates changes non-compliant LOS intersections from the DSEIS.
2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Weekday Summer PM Peak Hour

As shown in **Table 1**, all study intersections currently operate at an acceptable LOS during the weekday summer PM peak hour, with the exception of the following two-way stop-controlled intersections:

- #11 - Douglas Munro Blvd / W 1st Street – LOS D
- #12 - Pine Street / W 1st Street – LOS D

Friday Summer PM Peak Hour

As shown in **Table 1**, all study intersections currently operate at an acceptable LOS during the Friday summer PM Peak hour, with the exception of the following two-way stop-controlled intersections:

- #11 - Douglas Munro Blvd / W 1st Street – LOS F
- #12 - Pine Street / W 1st Street – LOS D

Sunday Summer PM Peak Hour

As shown in **Table 1**, all study intersections currently operate at an acceptable LOS during the Sunday PM peak hour, with the exception of the following two-way stop-controlled intersections:

- #8 - Ranger Station Rd / Miller Ave / W 2nd Street – LOS E
- #9 - N Pine St / W 2nd Street (SR 903) – LOS D *(not identified as non-compliant in DSEIS)*
- #11 - Douglas Munro Blvd / W 1st Street – LOS D
- #12 - Pine Street / W 1st Street – LOS E
- #13 - N Stafford Ave / W 2nd Street (SR 903) – LOS F
- #15 -N Oakes Ave / W 2nd Street (SR 903) – LOS D *(not identified as non-compliant in DSEIS)*
- #24 - SR 903 / SR 903 Ramp – LOS F
- #27 - SR 970 / SR 970 Ramp – LOS F

Future 'Baseline' Intersection LOS

Future 'Baseline' analysis results at the 27 study intersections for future years 2025, 2031, and 2037 are summarized in **Table 2** for the weekday PM peak hour, **Table 3** for the Friday PM peak hour, and **Table 4** for the Sunday peak hour during the peak summer period. The LOS results are discussed in detail following the tables.

The summary of the future 'Baseline" intersection LOS analysis has been updated in **Tables 2 to 4** below to reflect WSDOT's LOS C standard for study intersections on state routes. Study intersections forecast to operate at non-compliant LOS (LOS D, E, or F for City and WSDOT intersections and LOS E or F for Kittitas County intersections) are shown in bold text in the tables. The LOS results are discussed in detail following the tables. Study intersections currently operating at non-compliant LOS based on the updated LOS C threshold for WSDOT intersections that were not identified in the DSEIS are shown as underlined, italicized, and bold text in **Tables 2 to 4** in this *Addendum.* Please refer to footnote 1 in the tables for further explanation.

It should be noted that although **Tables 2 to 4** in this *Addendum* have been updated to reflect the LOS C standard for WSDOT intersections and identify noncompliant intersections, the LOS and delay summarized in the tables are the same as previously documented in **Tables 8 to 10** of the *47° North Draft SEIS Transportation Analysis*. New or revised LOS evaluations were not necessary.

Table 2
FUTURE 'BASELINE' INTERSECTION LOS SUMMARY – WEEKDAY PM PEAK HOUR (SUMMER)

		Weekday PM Peak Hour Conditions (Summer Peak)					
		Year 2025 'Baseline'		Year 2031 'Baseline'		Year 2037 'Baseline'	
Study Intersection	LOS Standard	LOS[1]	Delay[1]	LOS[1]	Delay[1]	LOS[1]	Delay[1]
Signalized							
14. S Cle Elum Way / Stafford / W 1st St	C	B	11.5	B	12.8	B	13.8
16. N Oakes Ave / W 1st St (SR 903)	C	B	10.4	B	11.7	B	15.9
18. Pennsylvania Ave / 1st St (SR 903)	C	A	7.6	A	8.0	A	9.1
Roundabout							
4. Bullfrog Rd / Suncadia Trail	D	A	5.1	A	5.9	A	7.3
6. Bullfrog Rd / W 2nd St (SR 903)	C	A	6.2	A	6.9	A	7.7
All-Way Stop-Controlled							
17. Pennsylvania Ave / 2nd St	C	A	9.6	B	11.9	C	16.8
Two-Way Stop-Controlled [3]							
1. Bullfrog Rd / I-90 EB Ramps	C	B	13.0	C	17.0	***D***	***27.3***
2. Bullfrog Rd / I-90 WB Ramps	C	B	10.6	B	12.7	C	19.4
3. Bullfrog Rd / Tumble Creek Dr	D	B	12.4	C	16.3	C	24.8
5. Bullfrog Rd / Firehouse Rd	D	B	11.5	B	11.8	B	11.9
7. Denny Ave / W 2nd St (SR 903)	C	C	16.6	C	20.1	***D***	***25.8***
8. Ranger Sta Rd / Miller / W 2nd (SR 903)	C	D	26.1	**E**	**47.8**	**F**	**> 100**
9. N Pine St / W 2nd St (SR 903)	C	C	18.1	C	23.5	***D***	***27.4***
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	7.7	A	7.9	A	8.4
11. Douglas Munro Blvd / W 1st St	C	**E**	**46.2**	**F**	**74.7**	**F**	**> 100**
12. Pine St / W 1st St	C	**D**	**27.9**	**D**	**27.9**	**E**	**35.2**
13. N Stafford Ave / W 2nd St (SR 903)	C	**E**	**46.7**	**F**	**> 100**	**F**	**> 100**
15. N Oakes Ave / W 2nd St (SR 903)	C	***D***	***33.9***	**E**	**45.0**	**F**	**> 100**
19. Oakes Ave / I-90 EB Off-Ramp	C	C	20.3	B	10.2	B	10.8
20. Oakes Ave / I-90 EB On-Ramp	C	A	0.0	A	0.0	A	0.0
21. SR 903 / E Pennsylvania Ave	C	C	19.3	C	22.1	***D***	***25.4***
22. SR 903 / Pacific Ave	C	B	12.0	B	14.5	C	17.2
23. Rock Rose Rd / Morrel Rd / SR 903	C	B	10.7	B	11.2	B	12.2

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, underlined and italicized indicates changes non-compliant LOS intersections from the DSEIS..
2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Table 3
FUTURE 'BASELINE' INTERSECTION LOS SUMMARY – FRIDAY PM PEAK HOUR (SUMMER)

		Friday PM Peak Hour Conditions (Summer Peak)					
		Year 2025 'Baseline'		Year 2031 'Baseline'		Year 2037 'Baseline'	
Study Intersection	LOS Standard	LOS[1]	Delay[1]	LOS[1]	Delay[1]	LOS[1]	Delay[1]
Signalized							
14. S Cle Elum Way / Stafford / W 1st St	C	B	15.5	B	17.5	B	19.1
16. N Oakes Ave / W 1st St (SR 903)	*C*	B	13.3	B	15.1	C	20.9
18. Pennsylvania Ave / 1st St (SR 903)	*C*	A	7.7	A	8.9	B	10.5
Roundabout							
4. Bullfrog Rd / Suncadia Trail	D	A	7.2	B	10.1	B	14.9
6. Bullfrog Rd / W 2nd Street (SR 903)	*C*	A	8.2	A	9.6	B	11.0
All-Way Stop-Controlled							
17. Pennsylvania Ave / 2nd St	C	A	9.5	B	12.3	C	20.2
Two-Way Stop-Controlled [3]							
1. Bullfrog Rd/I-90 EB Ramps	*C*	C	23.5	**F**	**> 100**	**F**	**> 100**
2. Bullfrog Rd / I-90 WB Ramps	*C*	C	15.9	**E**	**41.5**	**F**	**> 100**
3. Bullfrog Rd / Tumble Creek Dr	D	B	12.5	C	17.3	C	24.6
5. Bullfrog Rd / Firehouse Rd	D	B	12.2	B	12.5	B	12.5
7. Denny Ave / W 2nd Street (SR 903)	C	C	19.6	***D***	***25.0***	**E**	**36.3**
8. Ranger Sta Rd / Miller / W 2nd (SR 903)	*C*	**F**	**62.6**	**F**	**> 100**	**F**	**> 100**
9. N Pine St / W 2nd St (SR 903)	*C*	***D***	***30.5***	**F**	**77.5**	**F**	**> 100**
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	8.2	A	8.6	A	9.5
11. Douglas Munro Blvd / W 1st St	C	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
12. Pine St / W 1st St	C	**E**	**38.1**	**E**	**42.5**	**F**	**54.0**
13. N Stafford Ave / W 2nd St (SR 903)	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
15. N Oakes Ave / W 2nd St (SR 903)	*C*	C	24.7	**F**	**95.1**	**F**	**> 100**
19. Oakes Ave / I-90 EB Off-Ramp	*C*	A	9.8	B	10.2	B	11.1
20. Oakes Ave / I-90 EB On-Ramp	*C*	A	0.0	A	0.0	A	0.0
21. SR 903 / E Pennsylvania Ave	*C*	C	20.0	C	23.4	***D***	***34.4***
22. SR 903 / Pacific Ave	*C*	B	11.6	B	13.9	C	16.0
23. Rock Rose Rd / Morrel Rd / SR 903	*C*	B	10.7	B	10.9	B	12.5

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, underlined and italicized indicates changes non-compliant LOS intersections from the DSEIS..
2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Table 4
FUTURE 'BASELINE' INTERSECTION LOS SUMMARY – SUNDAY PM PEAK HOUR (SUMMER)

		Sunday PM Peak Hour Conditions (Summer Peak)					
		Year 2025 'Baseline'		Year 2031 'Baseline'		Year 2037 'Baseline'	
Study Intersection	LOS Standard	LOS[1]	Delay[1]	LOS[1]	Delay[1]	LOS[1]	Delay[1]
Signalized							
14. S Cle Elum Way / Stafford / W 1st St	C	B	13.9	B	15.7	B	16.9
16. N Oakes Ave / W 1st St (SR 903)	*C*	B	17.1	C	21.2	***D***	***45.0***
18. Pennsylvania Ave / 1st St (SR 903)	*C*	A	9.2	A	9.8	B	10.6
Roundabout							
4. Bullfrog Rd / Suncadia Trail	D	B	13.7	C	20.9	**F**	**57.4**
6. Bullfrog Rd / W 2nd Street (SR 903)	*C*	C	18.6	C	24.9	**E**	**35.1**
All-Way Stop-Controlled							
17. Pennsylvania Ave / 2nd St	C	A	8.5	B	10.1	B	12.9
Two-Way Stop-Controlled [3]							
1. Bullfrog Rd/I-90 EB Ramps	*C*	B	11.9	C	15.3	C	19.7
2. Bullfrog Rd / I-90 WB Ramps	*C*	B	10.6	B	12.4	C	18.5
3. Bullfrog Rd / Tumble Creek Dr	D	C	22.2	D	32.7	**F**	**63.3**
5. Bullfrog Rd / Firehouse Rd	D	C	22.5	C	22.1	D	25.7
7. Denny Ave / W 2nd Street (SR 903)	C	C	23.4	***D***	***29.6***	**E**	**43.9**
8. Ranger Sta Rd / Miller / W 2nd (SR 903)	*C*	**F**	**56.6**	**F**	**> 100**	**F**	**> 100**
9. N Pine St / W 2nd St (SR 903)	*C*	**F**	**60.1**	**F**	**> 100**	**F**	**> 100**
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	7.4	A	7.6	A	7.9
11. Douglas Munro Blvd / W 1st St	C	**E**	**46.7**	**F**	**83.2**	**F**	**> 100**
12. Pine St / W 1st St	C	**E**	**49.6**	**E**	**48.5**	**F**	**54.3**
13. N Stafford Ave / W 2nd St (SR 903)	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
15. N Oakes Ave / W 2nd St (SR 903)	*C*	**F**	**91.6**	**F**	**> 100**	**F**	**> 100**
19. Oakes Ave / I-90 EB Off-Ramp	*C*	B	14.4	C	18.1	**E**	**35.3**
20. Oakes Ave / I-90 EB On-Ramp	*C*	A	0.0	A	0.0	A	0.0
21. SR 903 / E Pennsylvania Ave	*C*	C	17.2	C	22.5	***D***	***28.3***
22. SR 903 / Pacific Ave	*C*	B	12.0	B	13.3	C	16.6
23. Rock Rose Rd / Morrel Rd / SR 903	*C*	B	10.6	B	11.1	B	12.1
24. SR 903 / SR 903 Ramp	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
25. White Road I/C / I-90 WB Ramps	*C*	C	15.7	C	23.9	**F**	**52.5**
26. White Road I/C / I-90 EB Ramps	*C*	A	9.4	B	10.1	B	11.1
27. SR 970 / SR 970 Ramp	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, underlined and italicized indicates changes non-compliant LOS intersections from the DSEIS.
2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Weekday Summer PM Peak Hour

As shown in **Table 2**, the following intersections are expected to operate at non-compliant LOS for future 'Baseline' conditions during the summer weekday PM peak hour:

- #1 - Bullfrog Rd / I-90 EB Ramps – LOS D by 2037 *(not identified as non-compliant in DSEIS)*
- #7 - Denny Ave / W 2nd Street (SR 903) – LOS D by 2037 *(not identified as non-compliant in DSEIS)*
- #8 - Ranger Station Rd / Miller Ave / W 2nd Street (SR 903) – LOS E by 2031
- #9 - N Pine St / W 2nd St (SR 903) – LOS D by 2037 *(not identified as non-compliant in DSEIS)*
- #11 - Douglas Munro Blvd / W 1st Street – LOS E by 2025
- #12 - Pine Street / W 1st Street – LOS D by 2025
- #13 - N Stafford Ave / W 2nd Street (SR 903) – LOS E by 2025
- #15 - N Oakes Ave / W 2nd Street (SR 903) – LOS D by 2025 *(identified as non-compliant in 2031 in DSEIS)*
- #21 - SR 903 / Pennsylvania Ave (SR 903) – LOS D by 2037 *(not identified as non-compliant in DSEIS)*

Friday Summer PM Peak Hour

As shown in **Table 3**, the following intersections are expected to operate at non-compliant LOS for future 'Baseline' conditions during the summer Friday PM peak hour:

- #1 - Bullfrog Rd / I-90 EB Ramps – LOS F by 2031
- #2 - Bullfrog Rd / I-90 WB Ramps – LOS E by 2031
- #7 - Denny Ave / W 2nd Street (SR 903) – LOS D by 2031 *(identified as non-compliant in 2037 in DSEIS)*
- #8 - Ranger Station Rd / Miller Ave / W 2nd Street (SR 903) – LOS F by 2025
- #9 - N Pine St / W 2nd St (SR 903) – LOS D by 2025 *(identified as non-compliant in 2031 in DSEIS)*
- #11 - Douglas Munro Blvd / W 1st Street – LOS F by 2025
- #12 - Pine Street / W 1st Street – LOS E by 2025
- #13 - N Stafford Ave / W 2nd Street (SR 903) – LOS F by 2025
- #15 - N Oakes Ave / W 2nd Street (SR 903) – LOS F by 2031
- #21 - SR 903 / Pennsylvania Ave (SR 903) – LOS D by 2037 *(not identified as non-compliant in DSEIS)*

Sunday Summer PM Peak Hour

As shown in **Table 4**, the following intersections are expected to operate at non-compliant LOS for future 'Baseline' conditions during the summer Sunday PM peak hour:

- #3 - Bullfrog Rd / Tumble Creek – LOS F by 2037
- #4 - Bullfrog Rd / Suncadia Trail – LOS F by 2037
- #6 - Bullfrog Rd / W 2nd St (SR 903) – LOS E by 2037

- #7 - Denny Ave / W 2nd Street (SR 903) – LOS D by 2031 *(identified as non-compliant in 2037 in DSEIS)*
- #8 - Ranger Station Rd / Miller Ave / W 2nd Street (SR 903) – LOS F by 2025
- #9 - N Pine St / W 2nd St (SR 903) – LOS F by 2025
- #11 - Douglas Munro Blvd / W 1st Street – LOS E by 2025
- #12 - Pine Street / W 1st Street – LOS E by 2025
- #13 - N Stafford Ave / W 2nd Street (SR 903) – LOS F by 2025
- #15 - N Oakes Ave / W 2nd Street (SR 903) – LOS F by 2025
- #16 – N Oakes Ave / W 1st Street (SR 903) – LOS D by 2037 *(not identified as non-compliant in DSEIS)*
- #19 - Oakes Ave / I-90 EB off-ramp – LOS E by 2037
- #21 - SR 903 / Pennsylvania Ave (SR 903) – LOS D by 2037 *(not identified as non-compliant in DSEIS)*
- #24 - SR 903 / SR 903 Ramp – LOS F by 2025
- #25 - White Road I/C & I-90 WB Ramps – LOS F by 2037
- #27 - SR 970 / SR 970 Ramp – LOS F by 2025

Collision History and Traffic Safety

Collisions at the study intersections were reviewed and summarized for the most recent five-year period data available – from January 1, 2015 to December 31, 2019. Collision data was provided by the Washington State Department of Transportation (WSDOT). Summaries of the collisions by year, collisions by severity, total, and annual average collisions are provided in **Table 5**.

As shown in **Table 5**, all the collisions at the study intersections over the 5-year period were classified as either “no injury” or “minor/possible injury”, with no collisions classified as “major injury” or “fatality”.

Table 5
COLLISION DATA SUMMARY (2015 TO 2019)

	Collisions by Year					Collisions by Severity				
Study Intersection	2015	2016	2017	2018	2019	Major Injury	Minor/Possible Injury	No Injury	5-Year Total Collisions	Average Annual Collisions
Signalized										
14. S Cle Elum Way / Stafford / W 1st St	0	1	2	0	0	0	1	2	3	0.60
16. N Oakes Ave / W 1st St (SR 903)	3	1	1	0	0	0	1	4	5	1.00
18. Pennsylvania Ave / 1st St (SR 903)	1	3	1	3	1	0	5	4	9	1.80
Roundabout										
4. Bullfrog Rd / Suncadia Trail	0	0	1	0	0	0	0	1	1	0.20
6. Bullfrog Rd / W 2nd Street (SR 903)	1	0	1	0	1	0	2	1	3	0.60
All-Way Stop-Controlled										
17. Pennsylvania Ave / 2nd St	0	0	0	0	1	0	0	1	1	0.20
Two-Way Stop-Controlled										
1. Bullfrog Rd / I-90 EB Ramps	0	0	1	0	0	0	0	1	1	0.20
2. Bullfrog Rd / I-90 WB Ramps	0	2	0	2	2	0	1	5	6	1.20
3. Bullfrog Rd / Tumble Creek Dr	0	0	0	0	0	0	0	0	0	0.00
5. Bullfrog Rd / Firehouse Rd	0	0	0	0	0	0	0	0	0	0.00
7. Denny Ave / W 2nd Street (SR 903)	1	0	0	1	0	0	1	1	2	0.40
8. Ranger Sta Rd /Miller / W 2nd (SR 903)	0	1	0	0	2	0	1	2	3	0.60
9. N Pine St / W 2nd St (SR 903)	0	0	0	0	0	0	0	0	0	0.00
10. Douglas Munro Blvd / Ranger Sta Rd	0	0	0	0	1	0	1	0	1	0.20
11. Douglas Munro Blvd / W 1st St	2	1	4	1	1	0	3	6	9	1.80
12. Pine St / W 1st St	2	0	0	1	2	0	1	4	5	1.00
13. N Stafford Ave / W 2nd St (SR 903)	0	0	0	0	0	0	0	0	0	0.00
15. N Oakes Ave / W 2nd St (SR 903)	1	1	0	0	0	0	0	2	2	0.40
19. Oakes Ave / I-90 EB Off-Ramp	0	0	0	0	1	0	0	1	1	0.20
20. Oakes Ave / I-90 EB On-Ramp	1	0	1	0	0	0	0	2	2	0.40
21. SR 903 / E Pennsylvania Ave	0	0	0	0	0	0	0	0	0	0.00
22. SR 903 / Pacific Ave	0	0	0	0	0	0	0	0	0	0.00
23. Rock Rose Rd / Morrel Rd / SR 903	0	0	0	0	0	0	0	0	0	0.00
24. SR 903 / SR 903 Ramp	0	0	1	0	2	0	1	2	3	0.60
25. White Road I/C / I-90 WB Ramps	0	2	0	0	0	0	0	2	2	0.40
26. White Road I/C / I-90 EB Ramps	0	0	0	0	0	0	0	0	0	0.00
27. SR 970 / SR 970 Ramp	2	0	1	0	0	0	1	2	3	0.60

Impacts of the SEIS Alternatives

Future Year Intersection LOS with SEIS Alternative 5 and Alternative 6

Intersection LOS analysis results at the 27 study intersections with SEIS Alternative 5 (Approved Bullfrog Flats Master Site Plan) and SEIS Alternative 6 (47° North Master Site Plan Amendment) for future years 2025, 2031, and 2037 are summarized in **Table 6** for the weekday PM peak hour, **Table 7** for the Friday PM peak hour, and **Table 8** for the Sunday peak hour during the peak summer period. Year 2025, 2031, and 2037 'Baseline' LOS results are also presented in **Table 6 to Table 8** for comparison purposes. The LOS results are discussed in detail following the tables.

The future intersection LOS analysis summary with SEIS Alternative 5 and Alternative 6 has been updated in **Tables 6 to 8** below to reflect WSDOT's LOS C standard for study intersections on state routes. Study intersections forecast to operate at non-compliant LOS (LOS D, E, or F for City and WSDOT intersections and LOS E or F for Kittitas County intersections) are shown in bold text in the tables. Study intersections currently operating at non-compliant LOS based on the updated LOS C threshold for WSDOT intersections are shown as underlined, italicized, and bold text in **Tables 6 to 8** in this *Addendum.*

It should be noted that although **Tables 6 to 8** in this *Addendum* have been updated to reflect the LOS C standard for WSDOT intersections and identify non-compliant intersections, the LOS and delay summarized in the tables are the same as previously documented in **Tables 20 to 22** of the *47° North Draft SEIS Transportation Analysis*. Study intersections forecast to operate at non-compliant LOS in alternate years or scenarios (i.e. baseline vs. with SEIS Alternative 5 or Alternative 6) based on the updated LOS C threshold for WSDOT intersections are noted in italics in the detailed LOS discussion following **Tables 6 to 8**.

Study intersections forecast to operate at non-compliant LOS during the weekday summer PM peak hour with SEIS Alternative 5 or Alternative 6 are identified for potential improvements to meet the adopted LOS standards in **Section 4** (Mitigation Measures).

Table 6
SEIS ALTERNATIVE 6 INTERSECTION LOS SUMMARY – WEEKDAY PM PEAK HOUR (SUMMER)

		Weekday PM Peak Hour Conditions (Summer Peak)																	
		Year 2025						Year 2031						Year 2037					
		'Baseline'		With SEIS Alt 5		With SEIS Alt 6		'Baseline'		With SEIS Alt 5		With SEIS Alt 6		'Baseline'		With SEIS Alt 5		With SEIS Alt 6	
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 1st St	C	B	11.5	B	12.1	B	12.0	B	12.8	B	13.6	B	13.7	B	13.8	B	14.7	B	14.6
16. N Oakes Ave / W 1st St (SR 903)	*C*	B	10.4	B	10.9	B	10.8	B	11.7	B	12.8	B	13.0	B	15.9	C	21.4	C	21.1
18. Pennsylvania Ave / 1st St (SR 903)	*C*	A	7.6	A	7.8	A	7.5	A	8.0	A	8.8	A	8.6	A	9.1	B	11.2	B	10.7
Roundabout																			
4. Bullfrog Rd / Suncadia Trail	D	A	5.1	A	5.4	A	5.6	A	5.9	A	6.5	A	7.5	A	7.3	A	8.5	B	10.3
6. Bullfrog Rd / W 2nd St (SR 903)	*C*	A	6.2	A	6.6	A	6.8	A	6.9	A	7.6	A	8.0	A	7.7	A	8.8	A	9.7
All-Way Stop-Controlled																			
17. Pennsylvania Ave / 2nd St	C	A	9.6	B	10.3	B	10.1	B	11.9	B	14.4	B	14.3	C	16.8	**D**	**25.8**	C	20.6
Two-Way Stop-Controlled [3]																			
1. Bullfrog Rd / I-90 EB Ramps	*C*	B	13.0	B	14.8	C	15.3	C	17.0	C	23.3	***D***	***30.4***	***D***	***27.3***	**F**	**63.5**	**F**	**> 100**
2. Bullfrog Rd / I-90 WB Ramps	*C*	B	10.6	B	11.5	B	11.7	B	12.7	C	15.2	C	16.9	C	19.4	***D***	***33.7***	**E**	**42.1**
3. Bullfrog Rd / Tumble Creek Dr	D	B	12.4	B	13.9	B	13.9	C	16.3	C	20.7	C	23.9	C	24.8	**E**	**46.4**	**F**	**61.1**
5. Bullfrog Rd / Firehouse Rd	D	B	11.5	B	11.9	B	12.5	B	11.8	B	12.8	B	13.4	B	11.9	B	14.0	B	14.0
7. Denny Ave / W 2nd St (SR 903)	C	C	16.6	C	23.6	C	23.3	C	20.1	**E**	**36.4**	**E**	**38.1**	***D***	***25.8***	**F**	**78.1**	**F**	**65.5**
8. Ranger Sta Rd / Miller / W 2nd (SR 903)	*C*	***D***	***26.1***	**F**	**> 100**	**F**	**95.7**	**E**	**47.8**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
9. N Pine St / W 2nd St (SR 903)	*C*	C	18.1	***D***	***34.2***	***D***	***33.3***	C	23.5	**F**	**78.5**	**F**	**> 100**	***D***	***27.4***	**F**	**> 100**	**F**	**> 100**
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	7.7	A	7.9	A	7.9	A	7.9	A	8.2	A	8.3	A	8.4	A	8.9	A	9.0
11. Douglas Munro Blvd / W 1st St	C	**E**	**46.2**	**F**	**56.1**	**F**	**56.1**	**F**	**74.7**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
12. Pine St / W 1st St	C	**D**	**27.9**	**D**	**30.6**	**D**	**30.4**	**D**	**27.9**	**D**	**31.5**	**D**	**32.9**	**E**	**35.2**	**E**	**45.9**	**F**	**51.7**
13. N Stafford Ave / W 2nd 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 2nd St (SR 903)	*C*	C	20.3	***D***	***32.9***	***D***	***33.3***	**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	9.9	A	9.8	B	10.2	B	10.4	B	10.6	B	10.8	B	11.4	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	21.2	C	21.7	C	22.1	***D***	***25.3***	***D***	***29.3***	***D***	***25.4***	**E**	**35.6**	**E**	**42.6**
22. SR 903 / Pacific Ave	*C*	B	12.0	B	12.7	B	12.8	B	14.5	C	15.7	C	16.8	C	17.2	C	19.5	C	22.2
23. Rock Rose Rd / Morrel Rd / SR 903	*C*	B	10.7	B	10.8	B	11.0	B	11.2	B	11.5	B	11.9	B	12.2	B	12.6	B	13.2

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, underlined and italicized indicates changes non-compliant LOS intersections from the DSEIS.
2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Table 7
SEIS ALTERNATIVE 6 INTERSECTION LOS SUMMARY – FRIDAY PM PEAK HOUR (SUMMER)

		Friday PM Peak Hour Conditions (Summer Peak)																	
		Year 2025						Year 2031						Year 2037					
		'Baseline'		With SEIS Alt 5		With SEIS Alt 6		'Baseline'		With SEIS Alt 5		With SEIS Alt 6		'Baseline'		With SEIS Alt 5		With SEIS Alt 6	
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 1st St	C	B	15.5	B	16.2	B	16.1	B	17.5	B	18.5	B	18.6	B	19.1	C	20.3	C	20.2
16. N Oakes Ave / W 1st St (SR 903)	*C*	B	13.3	B	14.2	B	14.0	B	15.1	B	16.5	B	16.7	C	20.9	***D***	***41.8***	C	27.9
18. Pennsylvania Ave / 1st St (SR 903)	*C*	A	7.7	A	8.6	A	8.3	A	8.9	B	10.7	A	9.9	B	10.5	B	13.5	B	12.8
Roundabout																			
4. Bullfrog Rd / Suncadia Trail	D	A	7.2	A	7.8	A	8.1	B	10.1	B	11.7	C	15.0	B	14.9	C	19.8	D	31.4
6. Bullfrog Rd / W 2nd St (SR 903)	*C*	A	8.2	A	8.9	A	8.0	A	9.6	B	11.0	B	11.5	B	11.0	B	13.1	B	14.8
All-Way Stop-Controlled																			
17. Pennsylvania Ave / 2nd St	C	A	9.5	B	10.2	B	10.1	B	12.3	B	15.0	B	14.7	C	20.2	**D**	**32.8**	**D**	**26.5**
Two-Way Stop-Controlled [3]																			
1. Bullfrog Rd / I-90 EB Ramps	*C*	C	23.5	***D***	***33.8***	**E**	**36.7**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
2. Bullfrog Rd / I-90 WB Ramps	*C*	C	15.9	C	19.2	C	19.4	**E**	**41.5**	**F**	**85.8**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
3. Bullfrog Rd / Tumble Creek Dr	D	B	12.5	B	14.2	B	14.2	C	17.3	C	22.8	D	28.0	C	24.6	**E**	**49.6**	**F**	**71.7**
5. Bullfrog Rd / Firehouse Rd	D	B	12.2	B	12.9	B	13.4	B	12.5	B	13.6	B	14.3	B	12.5	B	13.8	B	14.7
7. Denny Ave / W 2nd St (SR 903)	C	C	19.6	***D***	***28.9***	***D***	***28.3***	***D***	***25.0***	**E**	**48.4**	**F**	**52.3**	**E**	**36.3**	**F**	**> 100**	**F**	**> 100**
8. Ranger Sta Rd / Miller / W 2nd (SR 903)	*C*	**F**	**62.6**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
9. N Pine St / W 2nd St (SR 903)	*C*	***D***	***30.5***	**F**	**83.0**	**F**	**81.5**	**F**	**77.5**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	8.2	A	8.5	A	8.5	A	8.6	A	9.0	A	9.1	A	9.5	B	10.3	B	10.4
11. Douglas Munro Blvd / W 1st St	C	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
12. Pine St / W 1st St	C	**E**	**38.1**	**E**	**43.8**	**E**	**43.4**	**E**	**42.5**	**F**	**54.4**	**F**	**57.3**	**F**	**54.0**	**F**	**92.4**	**F**	**> 100**
13. N Stafford Ave / W 2nd St (SR 903)	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
15. N Oakes Ave / W 2nd St (SR 903)	*C*	C	24.7	**E**	**47.7**	**E**	**48.0**	**F**	**95.1**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
19. Oakes Ave / I-90 EB Off-Ramp	*C*	A	9.8	B	10.0	A	9.9	B	10.2	B	10.6	B	10.6	B	11.1	B	11.8	B	11.7
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	20.0	C	22	C	22.8	C	23.4	***D***	***26.7***	***D***	***31.2***	***D***	***34.4***	**E**	**45.1**	**F**	**64.3**
22. SR 903 / Pacific Ave	*C*	B	11.6	B	12.1	B	12.2	B	13.9	B	14.9	C	16.0	C	16	C	17.9	C	20.1
23. Rock Rose Rd / Morrel Rd / SR 903	*C*	B	10.7	B	10.7	B	10.8	B	10.9	B	11.2	B	11.7	B	12.5	B	12.9	B	13.6

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, underlined and italicized indicates changes non-compliant LOS intersections from the DSEIS.
2. LOS at two-way stop-controlled intersections is reported for the stop-controlled movement with the highest delay.

Table 8
SEIS ALTERNATIVE 6 INTERSECTION LOS SUMMARY – SUNDAY PM PEAK HOUR (SUMMER)

		Sunday PM Peak Hour Conditions (Summer Peak)																	
		Year 2025						Year 2031						Year 2037					
		'Baseline'		With SEIS Alt 5		With SEIS Alt 6		'Baseline'		With SEIS Alt 5		With SEIS Alt 6		'Baseline'		With SEIS Alt 5		With SEIS Alt 6	
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 1st St	C	B	13.9	B	14.8	B	14.7	B	15.7	B	16.8	B	17.3	B	16.9	B	18.4	B	18.4
16. N Oakes Ave / W 1st St (SR 903)	*C*	B	17.1	B	18.5	B	18.0	C	21.2	C	24.9	C	25.5	***D***	***45.0***	**E**	**55.1**	**E**	**56.5**
18. Pennsylvania Ave / 1st St (SR 903)	*C*	A	9.2	B	11.0	B	10.5	A	9.8	B	12.6	B	11.2	B	10.6	B	12.9	B	13.3
Roundabout																			
4. Bullfrog Rd / Suncadia Trail	D	B	13.7	C	15.3	C	15.7	C	20.9	D	26.3	**E**	**37.0**	**F**	**57.4**	**F**	**73.5**	**F**	**90.2**
6. Bullfrog Rd / W 2nd St (SR 903)	*C*	C	18.6	C	21.7	C	22.4	C	24.9	***D***	***31.7***	**E**	**40.4**	**E**	**35.1**	**E**	**49.0**	**F**	**60.7**
All-Way Stop-Controlled																			
17. Pennsylvania Ave / 2nd St	C	A	8.5	A	8.9	A	8.9	B	10.1	B	11.1	B	10.9	B	12.9	C	15.1	B	14.7
Two-Way Stop-Controlled [3]																			
1. Bullfrog Rd / I-90 EB Ramps	*C*	B	11.9	B	13.4	B	13	C	15.3	C	19.0	C	20.9	C	19.7	***D***	***29.3***	***D***	***32.3***
2. Bullfrog Rd / I-90 WB Ramps	*C*	B	10.6	B	11.0	B	11	B	12.4	B	13.6	B	14.5	C	18.5	C	24.7	***D***	***26.9***
3. Bullfrog Rd / Tumble Creek Dr	D	C	22.2	D	25.8	D	26.1	D	32.7	**E**	**43.4**	**F**	**57.7**	**F**	**63.3**	**F**	**> 100**	**F**	**> 100**
5. Bullfrog Rd / Firehouse Rd	D	C	22.5	C	24.4	D	25.1	C	22.1	C	24.1	D	25.7	D	25.7	D	29.0	D	29.7
7. Denny Ave / W 2nd St (SR 903)	C	C	23.4	***D***	***33.1***	***D***	***31.4***	***D***	***29.6***	**E**	**48.1**	**F**	**56.6**	**E**	**43.9**	**F**	**> 100**	**F**	**> 100**
8. Ranger Sta Rd / Miller / W 2nd (SR 903)	*C*	**F**	**56.6**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
9. N Pine St / W 2nd St (SR 903)	*C*	**F**	**60.1**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
10. Douglas Munro Blvd / Ranger Sta Rd	C	A	7.4	A	7.6	A	7.6	A	7.6	A	7.8	A	7.9	A	7.9	A	8.3	A	8.4
11. Douglas Munro Blvd / W 1st St	C	**E**	**46.7**	**F**	**60.7**	**F**	**58.0**	**F**	**83.2**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
12. Pine St / W 1st St	C	**E**	**49.6**	**F**	**57.6**	**F**	**72.3**	**E**	**48.5**	**F**	**58.9**	**F**	**56.3**	**F**	**54.3**	**F**	**72.3**	**F**	**65.8**
13. N Stafford Ave / W 2nd St (SR 903)	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
15. N Oakes Ave / W 2nd St (SR 903)	*C*	**F**	**91.6**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
19. Oakes Ave / I-90 EB Off-Ramp	*C*	B	14.4	C	15.2	C	15.0	C	18.1	C	19.8	C	20.2	**E**	**35.3**	**E**	**43.6**	**E**	**44.0**
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	17.2	C	19.1	C	19.2	C	22.5	***D***	***26.1***	***D***	***30.7***	***D***	***28.3***	**E**	**35.3**	**E**	**45.1**
22. SR 903 / Pacific Ave	*C*	B	12.0	B	12.4	B	12.3	B	13.3	B	13.9	B	14.5	C	16.6	C	17.5	C	18.6
23. Rock Rose Rd / Morrel Rd / SR 903	*C*	B	10.6	B	10.8	B	10.7	B	11.1	B	11.4	B	11.5	B	12.1	B	12.5	B	12.8
24. SR 903 / SR 903 Ramp	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**
25. White Road I/C / I-90 WB Ramps	*C*	C	15.7	C	16.1	C	16.0	C	23.9	***D***	***25.3***	***D***	***25.9***	**F**	**52.5**	**F**	**58.9**	**F**	**60.0**
26. White Road I/C / I-90 EB Ramps	*C*	A	9.4	A	9.4	A	9.4	B	10.1	B	10.2	B	10.3	B	11.1	B	11.3	B	11.3
27. SR 970 / SR 970 Ramp	*C*	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**	**F**	**> 100**

1. LOS = Level of Service. Delay = average control delay expressed in seconds per vehicle. Bold indicates does not meet LOS standard. Bold, underlined and italicized indicates changes non-compliant LOS intersections from the DSEIS.

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

Weekday Summer PM Peak Hour

As shown in **Table 6**, the following study intersections are anticipated to operate at non-compliant LOS during the weekday summer PM peak hour in 2025, 2031, or 2037 with future 'Baseline' conditions, and continue to operate at non-compliant LOS with SEIS Alternative 5 or Alternative 6:

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

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

- #2 - Bullfrog Road / I-90 WB Ramps – LOS D with Alternative 5 or LOS E with Alternative 6 by 2037 (*identified as non-compliant with Alternative 6 only in DSEIS)*
- #3 - Bullfrog Road / Tumble Creek – LOS E with Alternative 5 and LOS F with Alternative 6 by 2037
- #7 - Denny Ave / W 2nd Street (SR 903) – LOS E by 2031
- #9 - N Pine Street / W 2nd Street (SR 903) – LOS D by 2025 *(identified as non-compliant in 2031 in DSEIS)*
- #15 - N Oakes Ave / W 2nd Street (SR 903) – LOS D by 2025 *(identified as non-compliant in 2031 'Baseline' in DSEIS)*
- #21 - Pennsylvania Ave / N 1st Street (SR 903) in Roslyn – LOS D by 2031 *(identified as non-compliant in 2037 in DSEIS)*

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

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

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

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

Friday Summer PM Peak Hour

As shown in **Table 7**, the following study intersections are anticipated to operate at non-compliant LOS during the Friday summer PM peak hour in 2025, 2031, or 2037 with future 'Baseline' conditions, and continue to operate at non-compliant LOS with SEIS Alternative 5 or Alternative 6:

- #2 - Bullfrog Rd / I-90 WB Ramps – LOS E by 2031
- #8 - Ranger Station Rd / Miller / W 2nd Street (SR 903) – LOS F by 2025
- #9 - N Pine Street / W 2nd Street (SR 903) – LOS D by 2025 *(identified as non-compliant in 2025 with Alternative 5 or Alternative 6 in DSEIS)*
- #11 - Douglas Munro Blvd / W 1st Street – LOS F by 2025
- #12 - N Pine Street / W 1st Street by 2025 – LOS E by 2025
- #13 - N Stafford Ave / W 2nd Street (SR 903) – LOS F by 2025

The following study intersections are expected to operate at non-compliant LOS during the Friday summer PM peak hour as a result of the additional traffic generated by SEIS Alternative 5 or Alternative 6:

- #1 - Bullfrog Rd / I-90 EB Ramps – LOS D with Alternative 5 or LOS E with Alternative 6 by 2025 *(identified as non-compliant with Alternative 6 only in DSEIS)*
- #3 - Bullfrog Rd / Tumble Creek Dr – LOS E with Alternative 5 and LOS F with Alternative 6 by 2037
- #7 - Denny Ave / W 2nd Street (SR 903) – LOS D by 2025 *(identified as non-compliant in 2031 in DSEIS)*
- #15 - N Oakes Ave / W 2nd Street (SR 903) – LOS E by 2025
- #17 - Pennsylvania Ave / 2nd Street – LOS D by 2037
- #21 - Pennsylvania Ave / N 1st Street (SR 903) in Roslyn – LOS D by 2031 (*identified as non-compliant in 2037 in DSEIS)*

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

- #16 - N Oakes Ave / W 1st Street (SR 903) – LOS D in 2037 *(not identified as non-compliant in DSEIS)*

Sunday Summer PM Peak Hour

As shown in **Table 8,** the following study intersections are anticipated to operate at non-compliant LOS during the Sunday summer PM peak hour in 2025, 2031, or 2037 with future 'Baseline' conditions, and continue to operate at non-compliant LOS with SEIS Alternative 5 or Alternative 6:

- #8 - Ranger Station Rd / Miller / W 2nd Street (SR 903) – LOS F by 2025
- #9 - N Pine Street / W 2nd Street (SR 903) – LOS F by 2025

- #11 - Douglas Munro Blvd / W 1st Street – LOS E by 2025
- #12 - N Pine Street / W 1st Street by 2025 – LOS E by 2025
- #13 - N Stafford Ave / W 2nd Street (SR 903) – LOS F by 2025
- #15 - N Oakes Ave / W 2nd Street (SR 903) – LOS F by 2025
- #16 - N Oakes Ave / W 1st Street (SR 903) – LOS D by 2037 *(identified as non-compliant in 2037 with Alternative 5 or Alternative 6 in DSEIS)*
- #19 - Oakes Ave / I-90 EB Off-Ramp – LOS E by 2037
- #24 - SR 903 / SR 903 Ramp – LOS F by 2025
- #27 - SR 907 / SR 907 Ramp – LOS F by 2025

The following study intersections are expected to operate at non-compliant LOS during the Sunday summer PM peak hour as a result of the additional traffic generated by SEIS Alternative 5 or Alternative 6:

- #1 - Bullfrog Rd / I-90 EB Ramps – LOS D by 2037 *(not identified as non-compliant in DSEIS)*
- #3 - Bullfrog Rd / Tumble Creek Dr – LOS E with Alternative 5 or LOS F with Alternative 6 by 2031
- #6 - Bullfrog Rd / W 2nd Street (SR 903) – LOS D with Alternative 5 or LOS E with Alternative 6 by 2031 *(identified as non-compliant with Alternative 6 only in DSEIS)*
- #7 - Denny Ave / W 2nd Street (SR 903) – LOS D by 2025 *(identified as non-compliant in 2031 in DSEIS)*
- #21 - Pennsylvania Ave / N 1st Street (SR 903) in Roslyn – LOS D by 2031 *(identified as non-compliant in 2037 in DSEIS)*
- #25 - White Road I/C / I-90 WB Ramps – LOS D by 2031 *(identified as non-compliant in 2037 'Baseline' in DSEIS)*

The following study intersections are anticipated to operate at non-compliant LOS during the Sunday summer PM peak hour as a result of the additional traffic generated by SEIS Alternative 6 only:

- #2 - Bullfrog Rd / I-90 WB Ramps – LOS D by 2037 *(not identified as non-compliant in DSEIS)*
- #4 - Bullfrog Rd / Suncadia Trail – LOS E by 2031

Future Year Site Access LOS with SEIS Alternative 6

Future years 2025, 2031, and 2037 with SEIS Alternative 6 LOS analysis results at the site access intersections are summarized in **Table 9** for the weekday PM peak hour, Friday PM peak hour, and Sunday PM peak hour, all for the summer peak period. The LOS analysis for the site access locations assumes that all site access locations would be two-way stop-controlled with the major street (Bullfrog Road or SR 903) free-flow. Mitigation has been identified in Section 4 if the site access intersection is expected to operate at non-compliant LOS.

Table 9 has been updated to reflect LOS C as the WSDOT LOS standard for the SR 903/New Connector Road site access intersection. Accordingly, site access intersections forecast to operate at non-compliant LOS (LOS D, E, or F for the SR 903/New Connector Road site access and LOS E or F for the proposed Bullfrog Road site accesses) are shown in bold text in the table. The LOS results are discussed in detail following the table.

It should be noted that although **Table 9** in this *Addendum* has been updated to reflect the LOS C standard for the proposed site access under WSDOT jurisdiction and identify non-compliant intersections, the LOS and delay summarized in the table remain the same as documented in **Table 23** of the *47° North Draft SEIS Transportation Analysis*.

Table 9
SEIS ALTERNATIVE 6 SITE ACCESS LOS SUMMARY [1]

		Future Conditions With SEIS Alternative 6 (Summer Peak)					
		Year 2025		Year 2031		Year 2037	
Site Access Intersection [1]	LOS Standard	LOS[1]	Delay[1]	LOS[1]	Delay[1]	LOS[1]	Delay[1]
WEEKDAY PM PEAK HOUR CONDITIONS							
28. Bullfrog Road / RV Resort Access	D	C	16.6	C	24.0	D	28.6
29. Bullfrog Road / New Connector Road	D	B	13.5	C	16.2	C	23.2
30. SR 903 / New Connector Road	*C*	**F**	**55.9**	**F**	**> 100**	**F**	**> 100**
FRIDAY PM PEAK HOUR CONDITIONS							
28. Bullfrog Road / RV Resort Access	D	D	25.2	**F**	**53.7**	**F**	**65.1**
29. Bullfrog Road / New Connector Road	D	C	16.2	C	24.8	D	34.7
30. SR 903 / New Connector Road	*C*	**F**	**82.6**	**F**	**> 100**	**F**	**> 100**
SUNDAY PM PEAK HOUR CONDITIONS							
28. Bullfrog Road / RV Resort Access	D	**E**	**48.9**	**F**	**> 100**	**F**	**> 100**
29. Bullfrog Road / New Connector Road	D	D	29.4	**F**	**> 100**	**F**	**> 100**
30. SR 903 / New Connector Road	*C*	**F**	**89.7**	**F**	**> 100**	**F**	**> 100**

1. LOS analysis at site access intersections assumes two-way stop control with major roadway (Bullfrog Road and SR 903) being free flow. Underlined and italicized indicates changes to LOS standards from the DSEIS.

Weekday Summer PM Peak Hour. As shown in **Table 9**, during the weekday summer PM peak hour with SEIS Alternative 6, the site access intersection of SR 903/New Connector Road (#30) is anticipated to operate at non-compliant LOS (LOS F) by 2025.

Friday Summer PM Peak Hour. As shown in **Table 9**, during the Friday summer PM peak hour with SEIS Alternative 6, the site access intersection of Bullfrog Road/RV Resort Access (#28) is anticipated to operate at non-compliant LOS (LOS F) by 2031 and SR 903/New Connector Road (#30) is anticipated to operate at LOS F by 2025.

Sunday Summer PM Peak Hour. As shown in **Table 9**, during the Sunday summer PM peak hour with SEIS Alternative 6, the site access intersections of Bullfrog Road/RV Resort Access (#28) and SR 903/New Connector Road (#30) are anticipated to operate at non-compliant LOS (LOS E and LOS F respectively) by 2025. Additionally, the site access at Bullfrog Road/New Connector Road (#29) is anticipated to operate at non-compliant LOS (LOS F) by 2031.

Mitigation Measures

Introduction

This section identifies potential mitigation measures at the study intersections and site access intersections necessary to mitigate the adverse transportation impacts of SEIS Alternative 6. This section of the *Transportation Analysis Addendum* has restructured the Mitigation Measures section of the DSEIS in response to public and agency comments, and addresses the following elements.

- Mitigation for 'Baseline' Conditions
- Mitigation for SEIS Alternative 6
- Costs of Mitigation Measures
- Comparison of Mitigation in FSEIS and DSEIS
- Revised Trip Generation for 47° North RV Resort
- Application of Pro-Rata Share Mitigation
- Pro-Rata Share Methods
- Site Access Mitigation
- Other Mitigation

Table 10 identifies potential mitigation measures and cost methods for funding. The Table includes 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 as a result of 'Baseline' conditions or SEIS Alternative 6 project traffic, and also identifies potential improvements to mitigate the non-compliant LOS. **Table 10** identifies two different pro-rata shares methods to fund the identified mitigations. Method A (Developer Responsibility) and Method B (Shared City/Developer Responsibility) are both presented.

It should also be noted that there are other potential alternative pro-rata share methodologies that could be applied; for example, removing existing traffic volumes from the "Background Share" which would allocate the pro-rata share responsibility only to future traffic volume growth (removing existing traffic) and would result in a larger proportional responsibility to 47° North and the commercial development. The final pro-rata share methodology and calculations for the 47° North development and possible commercial development are anticipated to be defined in a new or updated Development Agreement.

While **Table 10** identifies potential improvements (i.e. compact roundabout or signal) to mitigate future non-compliant LOS, and potential pro-rata share estimates for the cost of improvements, the specific form of mitigation, the pro-rata share cost of the mitigation, and the timing of the improvements will be evaluated, discussed and adopted based on discussions between the project Applicant, the City of Cle Elum, Kittitas County WSDOT, and the City of Roslyn. The selected mitigation improvement, adopted pro-rata share methodology, and timing of the mitigation will be incorporated into a new or updated Development Agreement between the project Applicant and the City of Cle Elum, and also

expected to be addressed in subsequent updates to the appropriate transportation plans and capital improvement programs.

To assist the Applicant, Cities of Cle Elum and Roslyn, Kittitas County and WSDOT in confirming mitigation improvements, Intersection Control Evaluation (ICE) documents will be prepared for study intersections within WSDOT's jurisdiction and considered during review of a project application. Criteria addressed in the ICE analyses will include LOS operations, safety, right-of-way acquisition, engineering criteria and feasibility, and context for sustainable design. The City may also require similar ICE analyses at the two additional (non-WSDOT) intersections (#11 and #12) that are anticipated to operate at non-compliant LOS.

Costs of Mitigation Measures

Table 10 identifies potential improvements necessary to mitigate 11 study intersections forecast to operate at non-compliant LOS in future years 2025, 2031, or 2037 without or with SEIS Alternative 6 during the weekday summer PM peak hour. Preliminary rough order of magnitude (ROM) cost estimate ranges for the potential improvements are provided below:

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

Table 10
SUMMARY OF MITIGATION MEASURES AND PRELIMINARY ESTIMATED PRO-RATA SHARE FOR SEIS ALTERNATIVE 6

Off-Site Study Intersection	Estimated Year Improvement Required (Forecast LOS)	Potential Improvement to Mitigate LOS Deficiency [1]	WITH 100% OCCUPANCY OF 47° NORTH RV RESORT [2]						WITH 50% OCCUPANCY OF 47° NORTH RV RESORT [2]					
			METHOD A Estimated Pro-Rata Share [3]			METHOD B Estimated Pro-Rata Share [3]			METHOD A Estimated Pro-Rata Share [3]			METHOD B Estimated Pro-Rata Share [3]		
			Back-ground Share [4]	SEIS Alternative 6 Share		Back-ground Share [4]	SEIS Alternative 6 Share		Back-ground Share [4]	SEIS Alternative 6 Share		Back-ground Share [4]	SEIS Alternative 6 Share	
				47° North	Commercial Parcel		47° North	Commercial Parcel		47° North	Commercial Parcel		47° North	Commercial Parcel
IMPROVEMENTS NEEDED FOR 'BASELINE'/BACKGROUND CONDITIONS														
#8 – Ranger Sta Rd / Miller Ave / W 2nd St (SR 903) [7]	2025 (LOS D)	Compact RAB or Signalization	76.6%	20.4%	3.0%	76.6%	20.4%	3.0%	78.1%	18.4%	3.5%	78.1%	18.4%	3.5%
#11 – Douglas Munro Blvd / W 1st Street	2025 (LOS E)	RAB or Signalization	96.7%	2.9%	0.4%	96.7%	2.9%	0.4%	97.1%	2.4%	0.5%	97.1%	2.4%	0.5%
#12 – N Pine St / W 1st Street	2025 (LOS D)	Traffic Signal or Left-Turn Restrictions	97.4%	2.3%	0.3%	97.4%	2.3%	0.3%	97.4%	2.2%	0.4%	97.4%	2.2%	0.4%
#13 – N Stafford Ave / W 2nd Street (SR 903) [7]	2025 (LOS E)	Compact RAB or Signalization	83.2%	16.8%	2.5%	83.2%	16.8%	2.5%	82.2%	15.0%	2.8%	82.2%	15.0%	2.8%
IMPROVEMENTS NEEDED FOR CONDITIONS WITH SEIS ALTERNATIVE 6 [5]														
By Year 2025:														
#9 – N Pine Street / W 2nd Street (SR 903) [7]	2025 (LOS D)	Compact RAB or Signalization or Turn Restrictions	n/a	87%	13%	77.1%	19.9%	3.0%	n/a	84%	16%	78.6%	18.0%	3.4%
#15 – N Oakes Ave / W 2nd Street (SR 903) [7]	2025 (LOS D)	Compact RAB or Signalization	n/a	87%	13%	85.6%	14.4%	2.1%	n/a	84%	16%	85.0%	12.6%	2.4%
By Year 2031:														
#1 – Bullfrog Road / I-90 EB Ramps [7]	2031 (LOS D)	Compact RAB or Signalization	n/a	64%	36%	77.4%	14.5%	8.1%	n/a	61%	39%	80.7%	11.8%	7.5%
#7 – Denny Ave / W 2nd Street (SR 903) [7]	2031 (LOS E)	Refuge/merge lane on SR 903 or Left- Turn Restrictions	n/a	64%	36%	68.1%	20.4%	11.5%	n/a	61%	39%	69.1%	18.8%	12.1%
#21 – Pennsylvania Ave / 1st Street (SR 903) [7]	2031 (LOS D)	All-Way Stop	n/a	64%	36%	90.1%	6.3%	3.6%	n/a	61%	39%	90.4%	5.9%	3.7%
By Year 2037: [6]														
#2 – Bullfrog Road / I-90 WB Ramps [7]	2037 (LOS E)	Compact RAB or Signalization	n/a	0%	100%	81.8%	9.1%	9.1%	n/a	0%	100%	84.2%	7.3%	8.5%
#3 – Bullfrog Road / Tumble Creek Dr	2037 (LOS F)	Refuge/merge lane on Bullfrog Rd	n/a	0%	100%	81.1%	9.5%	9.4%	n/a	0%	100%	83.3%	7.7%	9.0%

1) Improvement needed to mitigate non-compliant LOS during weekday PM peak hour; with improvement the intersection LOS would meet standard. RAB = Roundabout.
2) Average occupancy of 47° North RV resort during summer weekday PM peak hour estimated to be 50% based on data provided by Applicant. Estimated pro-rata shares are presented for both 100% and 50% RV resort occupancy.
3) Estimated pro-rata share for 47° North and commercial parcel are preliminary estimates and will be adjusted based on a future Monitoring Program. The pro-rata share for Method A would be the full responsibility of the 47° North Master Site Plan and the separate commercial parcel for any improvements needed with SEIS Alternative 6. The pro-rata share for Method B would be shared between the background traffic and SEIS Alternative 6 project traffic (47° North and commercial parcel).
4) Share of future traffic volumes associated with background traffic growth not specifically from SEIS Alternative 6.
5) Mitigation not triggered by 'Baseline' conditions, but triggered by traffic generated by SEIS Alternative 6 (47° North and/or commercial parcel).
6) 47° North is anticipated to be built out by 2031. Therefore pro-rata share of mitigation triggered by SEIS Alt 6 in 2037 is 100% to the commercial parcel for pro-rata Method A.
7) Separate Intersection Control Evaluation (ICE) studies at WSDOT intersections will be conducted to evaluate and recommend specific mitigation during review of a project application.

Mitigation Measures for 'Baseline' Conditions

As shown in **Table 10**, four study intersections are anticipated to operate at a non-compliant LOS under future weekday summer PM peak hour 'Baseline' conditions (without SEIS Alternative 6). However, no improvements are currently identified at these intersections in either the City of Cle Elum *Six-Year Transportation Improvement Program (TIP)*, the City of Cle Elum *Transportation Element*, *or the WSDOT Statewide Transportation Improvement Program (STIP)*.

Potential improvements to mitigate non-compliant LOS at the four study intersections under future weekday summer PM peak hour 'Baseline' conditions are identified in **Table 10** and include a compact (single-lane) roundabout, signalization, and turn restrictions.

For the four intersections where improvements would be needed based on forecast 'Baseline' conditions (without SEIS Alternative 6), the 47° North project would contribute a pro-rata share towards intersection improvements since additional traffic would be added by the project. Additional discussion of pro-rata share methodology is included below.

Mitigation Measures for SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment

As shown in **Table 10**, in addition to the four study intersections anticipated to operate at a non-compliant LOS under future weekday summer PM peak hour 'Baseline' conditions, seven additional study intersections are anticipated to operate at a non-compliant LOS as a result of SEIS Alternative 6 in either 2025, 2031, or 2037.

Potential improvements to mitigate non-compliant LOS at the seven study intersections under future weekday summer PM peak hour conditions with SEIS Alternative 6 are identified in **Table 10** and include a compact (single-lane) roundabout, signalization, roadway widening to add refuge/merge lanes, and turn restrictions.

For the seven intersections where improvements would be needed based on forecast conditions with SEIS Alternative 6, the 47° North project would contribute a pro-rata share towards intersection improvements.

Comparison of Mitigation Measures identified in FSEIS vs DSEIS

It should be noted that **Table 25** of the *DSEIS Transportation Analysis* identified the same 11 study intersections included in **Table 10** that are forecast to operate at non-compliant LOS in future years 2025, 2031, or 2037 without or with SEIS Alternative 6 during the weekday summer PM peak hour as included in **Table 10**. The only difference between **Table 25** in the *DSEIS* and **Table 10** in this *FSEIS Addendum* are in the timing of non-compliance and therefore mitigation at five study intersections, as follows:

- #1 – Bullfrog Road / I-90 EB Ramps is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2031 instead of 2037.

- #8 – Ranger Sta Rd / Miller Ave / W 2nd St (SR 903) is anticipated to operate at a non-compliant LOS under 'Baseline' conditions in 2025 instead of SEIS Alternative 6 conditions in 2025.
- #9 – N Pine Street / W 2nd Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2025 instead of 2031.
- #15 – N Oakes Ave / W 2nd Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2025 instead of 2031 'Baseline'.
- #21 – Pennsylvania Ave / 1st Street (SR 903) is anticipated to operate at a non-compliant LOS under SEIS Alternative 6 conditions in 2031 instead of 2037.

Revised Trip Generation for SEIS Alternative 6 based on 47° North RV Resort Occupancy

The weekday PM peak hour trip generation estimates during the summer peak period for SEIS Alternative 6 documented in the *47° North Draft SEIS Transportation Analysis* were based on methodology documented in the Institute of Transportation Engineers (ITE) *Trip Generation* Manual (10th edition). The trip generation estimates used in the Draft SEIS for the proposed 47° North RV Resort conservatively assumed 100% occupancy during the weekday PM peak hour of the summer peak season. Based on weekday occupancy data provided by the 47° North applicant at two existing and similar RV Resort properties in the US, 50% occupancy of the RV Resort is anticipated for SEIS Alternative 6 during the weekday PM peak hour of the summer peak period. The detailed revised trip generation calculations for SEIS Alternative 6 assuming 50% occupancy of the 47° North RV Resort are provided in **Appendix B**.

Table 11 provides a comparison of the SEIS Alternative 6 weekday PM peak hour trip generation with 100% occupancy of the 47° North RV Resort (as documented in the *47° North Draft SEIS Transportation Analysis*), and the revised weekday PM peak hour trip generation based on 50% occupancy of the RV Resort for future years 2025, 2031, and 2037.

Table 11
SEIS ALTERNATIVE 6 – WEEKDAY PM PEAK HOUR TRIP GENERATION COMPARISON WITH 100% vs. 50% RV RESORT OCCUPANCY

		Weekday PM Peak Hour Net New Total SEIS Alternative 6 Trip Generation [1]		
Year	Land Use / Size	(A) With 100% Occupancy of 47° North RV Resort [2]	(B) With 50% Occupancy of 47° North RV Resort [3]	Delta (B) minus (A)
2025	264 Single Family DU 180 Multi-Family DU 627 RV Resort sites	580	496	-84 (-14%)
	15,000 SF Commercial [4]			
2031	527 Single Family DU 180 Multi-Family DU 627 RV Resort sites	1,012	927	-85 (-8%)
	75,000 SF Commercial [4]			
2037	527 Single Family DU 180 Multi-Family DU 627 RV Resort sites	1,225	1,142	-83 (-7%)
	150,000 SF Commercial [4]			

SF = Square Feet, DU = Dwelling Unit

1. Trip generation estimates for SEIS Alternative 6 include only the RV, residential, and possible commercial uses and do not include the amenity/adventure center use, the community recreation center use, or affordable housing use.
2. As documented in the 47° North Draft SEIS Transportation Analysis (TENW, September 2020).
3. RV occupancy of 50% for summer weekday PM peak hour documented by Applicant at two similar RV Resort communities in US.
4. Land use associated with the possible development of the 25-acre commercial property.

As shown in **Table 11**, with the 47° North RV Resort at 50% occupancy during the weekday PM peak hour of the summer peak period, the total SEIS Alternative 6 project trip generation would be reduced by approximately 84 trips; this is equivalent to a 14% decrease in total weekday PM peak hour trip generation in 2025 and a 7-8% decrease in 2031 and 2037.

It should be noted that the mitigation identified at study intersections (shown in **Table 10**) is based on the future year 2025, 2031, and 2037 weekday PM peak hour LOS analysis summarized in this *Addendum* with SEIS Alternative 6 (see **Tables 6 and 9**). The LOS analysis in **Tables 6 and 9** was not updated to reflect the reduced trip generation for SEIS Alternative 6 based on the expected 50% occupancy of the 47° North RV Resort during the summer weekday PM peak hour. Thus, the LOS analysis and identification of study intersections requiring mitigation as a result of non-compliant LOS in future year 2025, 2031, or 2037 should be considered conservative since it is based on the DSEIS traffic analysis that assumed 100% occupancy of the RV Resort.

Application of Proportionate Share Mitigation

While pro-rata share calculations are not required to be identified in SEPA documents, they are presented here to promote further discussion and to reflect the relative contribution of different projects considered in the SEIS (47° North and possible commercial parcel), build out years, and methodologies to determine proportionate share of impacts. Potential methodologies for determining pro-rata share are discussed in further detail in the next section.

The pro-rata shares identified in **Table 10** at the 11 study intersections anticipated to operate at non-compliant LOS are considered preliminary. The final pro-rata share methodology and calculations for the 47° North development and possible commercial development are anticipated to be defined in a new or updated Development Agreement.

Methodologies for Determining Pro-Rata Share of Mitigation

For all transportation mitigation measures identified at the 11 study intersections anticipated to operate at a non-compliant LOS in the future without or with the project, preliminary pro-rata share contributions are estimated in **Table 10** for the 47° North project trips relative to the other components of the total future forecast weekday summer PM peak hour traffic volumes, including commercial use project trips and/or background traffic growth. **Table 10** in this *Addendum* has been revised from **Table 25** of the DSEIS *Transportation Analysis* to include two different methods to estimate proportionate (pro-rata) shares (Method A and Method B) of the mitigation measures; both methods are identified for consideration and are discussed in greater detail below.

It should be noted that **Table 10** of this *Addendum* has also been revised from **Table 25** in the DSEIS to identify preliminary pro-rata share contributions for the two pro-rata methods based on occupancy of the RV Resort; both 100% occupancy of the 47° North RV resort during the summer weekday PM peak hour (consistent with the DSEIS) and also 50% occupancy of the 47° North RV resort during the summer weekday PM peak hour (based on new data provided by the 47° North applicant at two existing and similar RV resort properties in the US). The result of including the anticipated 50% occupancy of the 47° North RV resort in the pro-rata share calculations is that the proportional share identified for the 47° North development is less than or similar to what was identified in the DSEIS.

The next two sub-sections describe pro-rata share separately for intersections requiring mitigation as a result of 'Baseline' conditions versus intersections requiring mitigation with SEIS Alternative 6.

Determining Pro-Rata Share for Intersections Requiring Mitigation as a Result of 'Baseline' Conditions

For the four intersections where improvements would be needed to meet adopted LOS standards based on forecast 'Baseline' conditions (i.e., without SEIS Alternative 6), the 47° North (residential and RV uses) and the possible commercial uses would contribute a pro-rata share towards intersection improvements since additional traffic would be added by the project. The preliminary pro-rata share calculation identified in **Table 10** for intersections anticipated to operate at a non-compliant LOS under future weekday PM peak hour 'Baseline' conditions is calculated by dividing the total weekday PM peak hour project traffic associated with SEIS Alternative 6 by the total forecast future with-project weekday PM peak hour traffic volumes ('Baseline' plus SEIS Alternative 6 project traffic). This pro-rata share methodology places the appropriate proportional responsibility for needed improvements on background traffic, since intersections are anticipated to be non-compliant due to background traffic (without the project). The detailed pro-rata share calculations are included in **Appendix C**.

Determining Pro-Rata Share for Intersections Requiring Mitigation with SEIS Alternative 6

For intersections where improvements would be needed to meet adopted LOS standards based on the additional traffic generated by SEIS Alternative 6, a preliminary estimate of the pro-rata share for 47° North (residential and RV uses) and the possible commercial uses is included in **Table 10**. The preliminary pro-rata share calculations in **Table 10** are based on forecast total future traffic volumes with SEIS Alternative 6 during the year in which mitigation is necessary to maintain acceptable LOS (i.e. 2025, 2031, or 2037).

Two different methods are identified that could be used to calculate pro-rata shares for mitigation anticipated to be needed as a result of 47° North SEIS Alternative 6, and both methods are described below. Method A is consistent with the pro-rata share methodology disclosed in the Draft SEIS; in general, this method results in a higher proportional responsibility to the 47° North development. Method B is an alternative pro-rata share methodology that more evenly shares responsibility as a result of background traffic growth, and is described as more of a shared responsibility between the 47° North development and the Agency (i.e. Cities of Cle Elum or Rosyln, WSDOT, Kittitas County). The detailed pro-rata share calculations for both Methods shown in **Table 10** are included in **Appendix C**.

It should also be noted that there are other potential alternative pro-rata share methodologies that could be applied; for example, removing existing traffic volumes from the "Background Share" which would allocate the pro-rata share responsibility only to future traffic volume growth (removing existing traffic) and would result in a larger proportional responsibility to 47° North and the commercial development. The final pro-rata share methodology and calculations for the 47° North development and possible commercial development are anticipated to be defined in a new or updated Development Agreement.

Method A (Developer Responsibility)

For intersections where improvements would only be needed by 2025 or 2031 due to the additional traffic generated by SEIS Alternative 6, the pro-rata share for Method A would be the full responsibility of the 47° North Master Site Plan and the separate commercial parcel. The pro-rata for this Method is calculated by applying the estimated percentage of 47° North trip generation and the commercial use trip generation (as summarized in **Table 19** of the *47° North Draft SEIS Transportation Analysis).* For intersections where improvements would be needed by 2037, there would be no pro-rata share for 47° North portion since it is anticipated to be built out before 2031; therefore 100% of the pro-rata share was identified for the commercial parcel.

Method B (Shared Agency/Developer Responsibility)

In response to comments received during the public comment process for the 47° North DRAFT SEIS, an alternative method (Method B) for estimating the proportionate (pro-rata) share of 47° North project trips at all off-site study intersections was identified. The calculations for this alternative Method are provided in **Table 10**.

The Method B pro-rata share calculations in **Table 10** for study intersections anticipated to require mitigation due to the additional traffic generated by 47° North SEIS Alternative 6 in either 2025, 2031, or 2037 are calculated by dividing the weekday PM peak hour project traffic associated with SEIS Alternative 6 by the total forecast future weekday PM peak hour traffic volumes (i.e. including both background traffic and SEIS Alternative 6). This identifies the share of the 47° North and commercial parcel as a portion of the mitigation responsibility and shares the remaining portion with background growth that may also benefit from increased capacity at the intersection. This method assumes that the governmental agency(s) responsible for the intersection would contribute funds proportionate with their shares of the future forecast traffic at the intersection.

Site Access Mitigation Measures

The 47° North development will construct new on-site roadways and intersections at its two access points with Bullfrog Road and single access onto SR 903 (public roads). The facilities will be constructed to City of Cle Elum standards, or standards included in a new or updated Development Agreement. The 47° North development will 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 9**, 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 Resort Access** is anticipated to operate at an acceptable LOS during the weekday summer PM peak hour in 2025, 2031, and 2037 with SEIS

Alternative 6 as a side street stop-controlled intersection with the RV Resort Access being stop-controlled.

- **#29 – Bullfrog Road / New Connector Road** is anticipated to operate at an acceptable LOS during the weekday summer PM peak hour in 2025, 2031, and 2037 with SEIS Alternative 6 as a side street stop-controlled intersection with the New Connector Road being stop-controlled.

- **#30 - SR 903 / New Connector Road** is anticipated to operate at LOS F during the weekday summer PM peak hour in 2025, 2031, and 2037 with SEIS Alternative 6 as a side street stop-controlled intersection. Potential mitigation is a compact (single-lane) roundabout or signalization with widening on SR 903 to accommodate a westbound left-turn lane. In order to confirm the appropriate mitigation at the SR 903/New Connector Road intersection, an Intersection Control Evaluation (ICE) document will be prepared and considered as part of a project application and incorporated into a new or updated Development Agreement.

Other Mitigation Measures

Traffic Monitoring Program

The 47° North development is expected to prepare and implement a traffic monitoring program as a condition of approval and/or as an element of a new or updated Development Agreement. It is expected that the traffic monitoring program would be similar in format and function to the previously established program documented in the 2002 Bullfrog Flats Development Agreement (Condition 92). The monitoring program would be coordinated with the City and other agencies (i.e. Kittitas County, WSDOT, City of Roslyn). The traffic monitoring program is anticipated to have the following objectives:

A. Document traffic volumes at key locations (roadways and/or intersections) in the local transportation network that would be impacted by traffic generated by the 47° North development.
B. Separate traffic volumes at key locations by background traffic, 47° North development traffic, and traffic associated with possible development of the commercial parcel.
C. Help establish the timing, location, and nature of required transportation improvements for pro-rata share calculations.

The traffic Monitoring Program for the 47° North RV resort and residential development is anticipated to be implemented during buildout of the project, which is expected to occur in 2028. Monitoring of 47° North could be conducted twice, in 2024 (prior to anticipated completion of the RV resort) and in 2027 (prior to anticipated completion of the single family housing). The specific details of the Monitoring Program, including the number of phases and duration of monitoring, appropriate timing of phases of monitoring, time periods to be

counted, key locations to be counted, and reporting requirements will be coordinated with the City and other agencies, and included as part of the new or updated 47° North Development Agreement. The traffic Monitoring Program for the possible commercial development cannot be determined at this time, as this development is considered speculative and has only been included in the SEIS for analysis purposes. Once plans for the commercial development are submitted to the City, a Monitoring Program for that development could be established.

Construction Management Plan

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

Trail System and Sidewalks

The 47° North development would provide a 6-mile network of trails and sidewalks throughout the site, including: hike/bike, equestrian, and golf cart paths. 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 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 on-site road connecting SR-903 and Bullfrog Road for non-motorized circulation. The design of pedestrian improvements would be identified in the project application, in conditions of approval, and in an updated Development Agreement.

Significant Unavoidable Adverse Impacts

Proposed development under SEIS Alternatives 5 and 6 would increase traffic volumes and congestion on area roadways (e.g., in the City, County, and on state facilities such as SR 903, SR 970, and I-90); this is an unavoidable effect of urban development. The LOS analysis indicates that several of the studied intersections would exceed LOS standards during the PM summer peak hours in the future analysis years with the additional traffic generated by the SEIS Alternatives; some of these intersections would also exceed the LOS standards without the projects due to continued growth in background traffic. The mitigation measures listed above would offset or reduce the significant adverse impacts under SEIS Alternative 6 during the weekday summer PM peak hour. These measures have been refined in the Final SEIS to present two options for the project's possible proportional share of required improvements. The measures will ultimately be included in a new or updated Development Agreement between the Applicant and the City.

APPENDIX A

Raw Traffic Counts

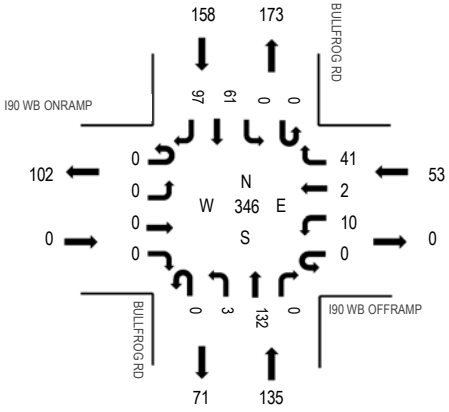
Weekday (Thursday) Data Sheets

All Traffic Data Services Inc.
(303) 216-2439
www.alltrafficdata.net

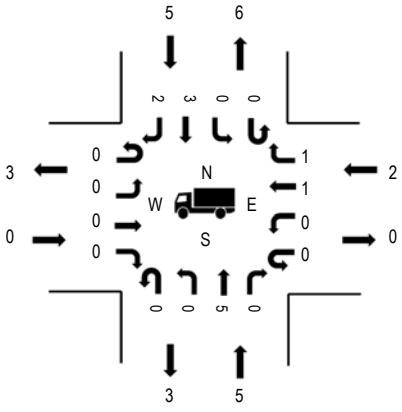
Location: 1 BULLFROG RD & I90 WB OFFRAMP PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

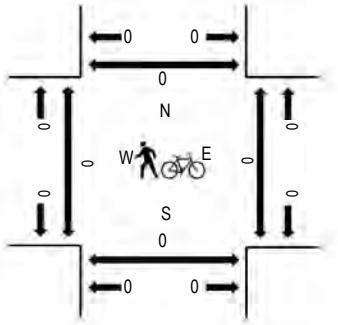
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	3.8%	0.78
NB	3.7%	0.84
SB	3.2%	0.90
All	3.5%	0.87

Traffic Counts - All Vehicles

Interval Start Time	I90 WB ONRAMP Eastbound				I90 WB OFFRAMP Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	0	0	0	5	1	9	0	0	28	0	0	0	21	23	87	346
3:15 PM	0	0	0	0	0	2	1	12	0	1	33	0	0	0	9	19	77	330
3:30 PM	0	0	0	0	0	2	0	15	0	2	38	0	0	0	18	24	99	323
3:45 PM	0	0	0	0	0	1	0	5	0	0	33	0	0	0	13	31	83	321
4:00 PM	0	0	0	0	0	2	1	6	0	0	26	0	0	0	14	22	71	324
4:15 PM	0	0	0	0	0	3	0	10	0	1	29	0	0	0	13	14	70	332
4:30 PM	0	0	0	0	0	4	0	12	0	1	47	0	0	0	18	15	97	325
4:45 PM	0	0	0	0	0	0	1	13	0	1	29	0	0	0	17	25	86	306
5:00 PM	0	0	0	0	0	2	0	6	0	1	31	0	0	0	18	21	79	285
5:15 PM	0	0	0	0	0	3	0	3	0	0	29	0	0	0	16	12	63	
5:30 PM	0	0	0	0	0	3	0	4	0	0	39	0	0	0	19	13	78	
5:45 PM	0	0	0	0	0	5	0	5	0	0	30	0	0	0	14	11	65	
Count Total	0	0	0	0	0	32	4	100	0	7	392	0	0	0	190	230	955	
Peak Hour	0	0	0	0	0	10	2	41	0	3	132	0	0	0	61	97	346	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	1	0	3	4	3:00 PM	0	0	0	0	0
3:15 PM	0	1	2	0	3	3:15 PM	0	0	0	0	0
3:30 PM	0	3	0	0	3	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	2	2	3:45 PM	0	0	0	0	0
4:00 PM	0	1	1	0	2	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	2	2	4:45 PM	0	0	0	0	0
5:00 PM	0	2	0	1	3	5:00 PM	0	0	0	0	0

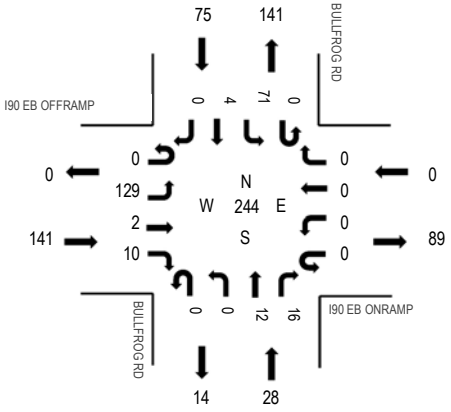
5:15 PM	0	0	0	1	1	5:15 PM	0	0	0	0	0
5:30 PM	0	0	1	1	2	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0	5:45 PM	0	0	0	0	0
Count Total	0	8	4	10	22	Count Total	0	0	0	0	0
Peak Hour	0	5	2	5	12	Peak Hour	0	0	0	0	0

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www.alltrafficdata.net

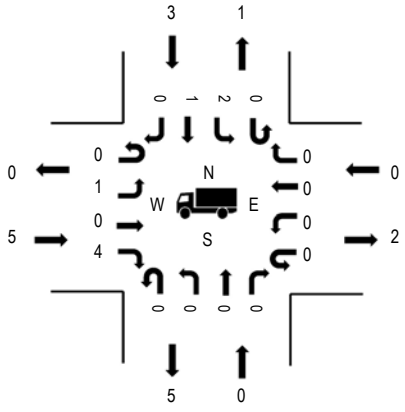
Location: 2 BULLFROG RD & I90 EB ONRAMP PM
Date: Thursday, August 15, 2019
Peak Hour: 04:15 PM - 05:15 PM

Peak Hour

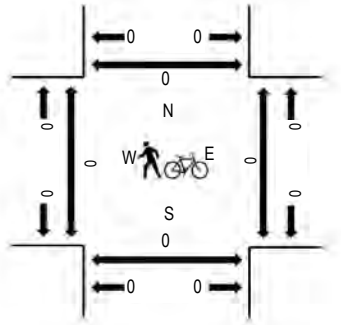
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	3.5%	0.77
WB	0.0%	0.00
NB	0.0%	0.37
SB	4.0%	0.85
All	3.3%	0.70

Traffic Counts - All Vehicles

Interval Start Time	I90 EB OFFRAMP Eastbound				I90 EB ONRAMP Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM	0	27	0	2	0	0	0	0	0	0	0	4	0	22	5	0	60	228
3:15 PM	0	33	1	1	1	0	0	0	0	0	2	0	0	12	0	0	50	217
3:30 PM	0	35	1	2	0	0	0	0	0	0	4	5	0	18	1	0	66	217
3:45 PM	0	30	0	1	0	0	0	0	0	0	3	3	0	13	2	0	52	238
4:00 PM	0	25	0	3	0	0	0	0	0	0	1	4	0	14	2	0	49	238
4:15 PM	0	28	0	1	0	0	0	0	0	0	2	3	0	16	0	0	50	244
4:30 PM	0	40	1	5	0	0	0	0	0	0	8	11	0	21	1	0	87	242
4:45 PM	0	29	0	4	0	0	0	0	0	0	1	1	0	16	1	0	52	219
5:00 PM	0	32	1	0	0	0	0	0	0	0	1	1	0	18	2	0	55	218
5:15 PM	0	26	1	0	0	0	0	0	0	0	2	0	0	17	2	0	48	
5:30 PM	0	39	1	0	0	0	0	0	0	0	1	1	0	20	2	0	64	
5:45 PM	0	30	1	1	0	0	0	0	0	0	0	1	0	15	3	0	51	
Count Total	0	374	7	20	1	0	0	0	0	0	25	34	0	202	21	0	684	
Peak Hour	0	129	2	10	0	0	0	0	0	0	12	16	0	71	4	0	244	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	1	0	2	4	3:00 PM	0	0	0	0	0
3:15 PM	1	0	1	0	2	3:15 PM	0	0	0	0	0
3:30 PM	2	0	0	0	2	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	1	1	3:45 PM	0	0	0	0	0
4:00 PM	1	0	0	0	1	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	4	0	0	0	4	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	2	2	4:45 PM	0	0	0	0	0
5:00 PM	1	0	0	1	2	5:00 PM	0	0	0	0	0

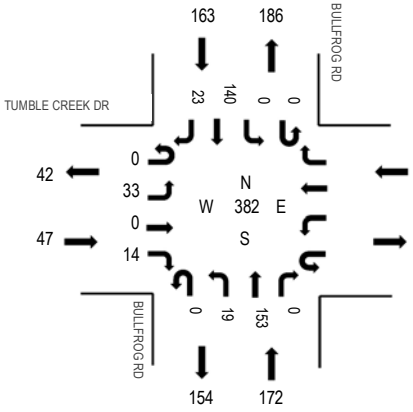
5:15 PM	0	0	0	1	1	5:15 PM	0	0	0	0	0
5:30 PM	0	0	0	1	1	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0	5:45 PM	0	0	0	0	0
Count Total	10	1	1	8	20	Count Total	0	0	0	0	0
Peak Hour	5	0	0	3	8	Peak Hour	0	0	0	0	0

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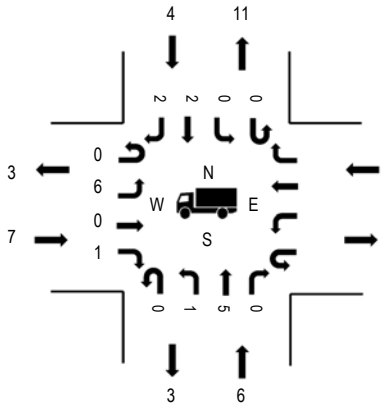
Location: 3 BULLFROG RD & TUMBLE CREEK DR PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

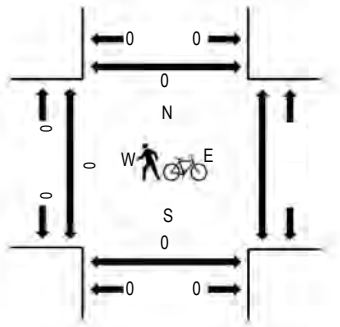
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	14.9%	0.90
WB		
NB	3.5%	0.83
SB	2.5%	0.87
All	4.5%	0.88

Traffic Counts - All Vehicles

Interval Start Time	TUMBLE CREEK DR Eastbound				Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	9	0	3					0	5	34	0	0	0	37	10	98	382
3:15 PM	0	6	0	4					0	6	39	0	0	0	24	2	81	359
3:30 PM	0	7	0	5					0	7	45	0	0	0	38	7	109	362
3:45 PM	0	11	0	2					0	1	35	0	0	0	41	4	94	346
4:00 PM	0	8	0	10					0	3	28	0	0	0	24	2	75	342
4:15 PM	0	9	0	4					0	5	33	0	0	0	30	3	84	347
4:30 PM	0	4	0	5					0	1	55	0	0	0	25	3	93	341
4:45 PM	0	3	0	4					0	4	41	0	0	0	35	3	90	327
5:00 PM	0	8	0	4					0	0	32	0	0	0	35	1	80	302
5:15 PM	0	10	0	3					0	1	33	0	0	0	27	4	78	
5:30 PM	0	6	0	4					1	3	39	0	0	0	24	2	79	
5:45 PM	0	2	0	4					0	0	34	0	0	0	23	2	65	
Count Total	0	83	0	52					1	36	448	0	0	0	363	43	1,026	
Peak Hour	0	33	0	14					0	19	153	0	0	0	140	23	382	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles EB	NB	WB	SB	Total	Interval Start Time	Pedestrians/Bicycles on Crosswalk EB	NB	WB	SB	Total
3:00 PM	1	0		2	3	3:00 PM	0	0		0	0
3:15 PM	2	3		0	5	3:15 PM	0	0		0	0
3:30 PM	0	3		1	4	3:30 PM	0	0		0	0
3:45 PM	4	0		1	5	3:45 PM	0	0		0	0
4:00 PM	0	2		0	2	4:00 PM	0	0		0	0
4:15 PM	0	0		1	1	4:15 PM	0	0		0	0
4:30 PM	0	0		0	0	4:30 PM	0	0		0	0
4:45 PM	0	0		2	2	4:45 PM	0	0		0	0
5:00 PM	1	1		0	2	5:00 PM	0	0		0	0

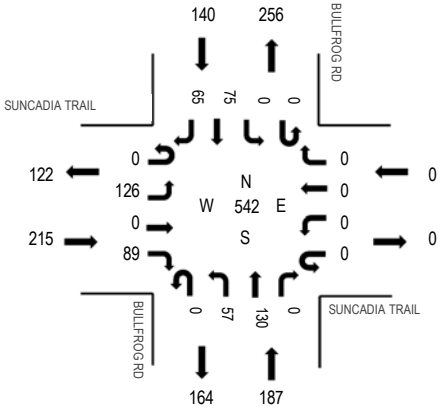
5:15 PM	0	0	1	1	5:15 PM	0	0	0	0
5:30 PM	0	1	1	2	5:30 PM	0	0	0	0
5:45 PM	0	0	0	0	5:45 PM	0	0	0	0
Count Total	8	10	9	27	Count Total	0	0	0	0
Peak Hour	7	6	4	17	Peak Hour	0	0	0	0

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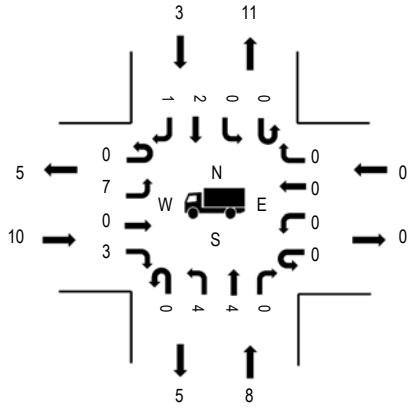
Location: 4 BULLFROG RD & SUNCADIA TRAIL PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

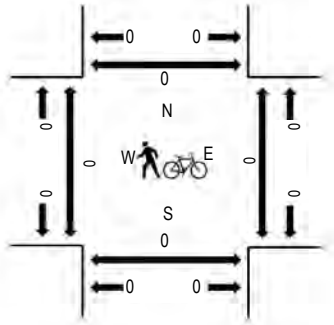
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.7%	0.84
WB	0.0%	0.00
NB	4.3%	0.94
SB	2.1%	0.76
All	3.9%	0.94

Traffic Counts - All Vehicles

Interval Start Time	SUNCADIA TRAIL Eastbound				SUNCADIA TRAIL Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	24	0	30	0	0	0	0	0	17	30	0	0	0	18	21	140	542
3:15 PM	0	34	0	15	0	0	0	0	0	10	30	0	0	0	15	12	116	516
3:30 PM	0	39	0	25	0	0	0	0	0	14	36	0	0	0	16	12	142	506
3:45 PM	0	29	0	19	0	0	0	0	0	16	34	0	0	0	26	20	144	490
4:00 PM	0	30	0	22	0	0	0	0	0	17	22	0	1	0	10	12	114	471
4:15 PM	0	19	0	7	0	0	0	0	0	13	25	0	1	0	22	19	106	477
4:30 PM	0	13	0	11	0	0	0	0	0	22	37	0	0	0	17	26	126	489
4:45 PM	0	26	0	12	0	0	0	0	0	21	25	0	1	0	21	19	125	479
5:00 PM	0	26	0	23	0	0	0	0	0	16	25	0	1	0	15	14	120	445
5:15 PM	0	22	0	18	0	0	0	0	0	11	33	0	1	0	15	18	118	
5:30 PM	0	25	0	13	0	0	0	0	0	16	30	0	0	0	14	18	116	
5:45 PM	0	20	0	12	0	0	0	0	0	14	20	0	0	0	10	15	91	
Count Total	0	307	0	207	0	0	0	0	0	187	347	0	5	0	199	206	1,458	
Peak Hour	0	126	0	89	0	0	0	0	0	57	130	0	0	0	75	65	542	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	2	2	0	1	5	3:00 PM	0	0	0	0	0
3:15 PM	3	3	0	1	7	3:15 PM	0	0	0	0	0
3:30 PM	2	1	0	1	4	3:30 PM	0	0	0	0	0
3:45 PM	3	2	0	0	5	3:45 PM	0	0	0	0	0
4:00 PM	1	3	0	0	4	4:00 PM	0	0	0	0	0
4:15 PM	0	1	0	1	2	4:15 PM	0	0	0	0	0
4:30 PM	1	0	0	0	1	4:30 PM	0	0	0	0	0
4:45 PM	1	0	0	0	1	4:45 PM	0	0	0	0	0
5:00 PM	0	1	0	0	1	5:00 PM	0	0	0	0	0

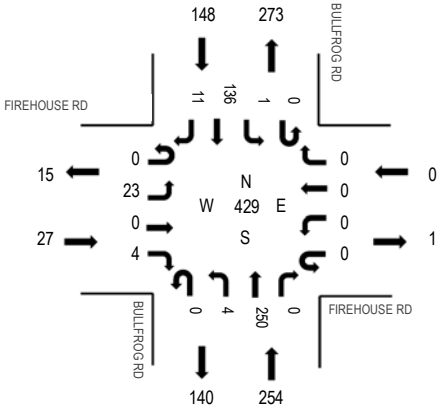
5:15 PM	1	0	0	1	2	5:15 PM	0	0	0	0	0
5:30 PM	1	0	0	0	1	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0	5:45 PM	0	0	0	0	0
Count Total	15	13	0	5	33	Count Total	0	0	0	0	0
Peak Hour	10	8	0	3	21	Peak Hour	0	0	0	0	0

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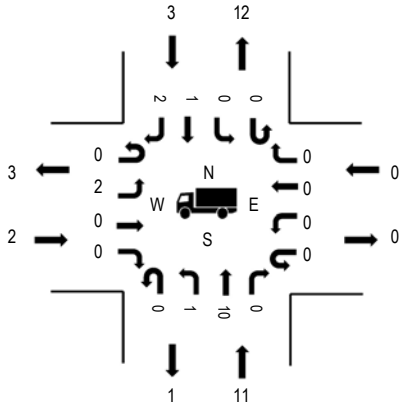
Location: 5 BULLFROG RD & FIREHOUSE RD PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

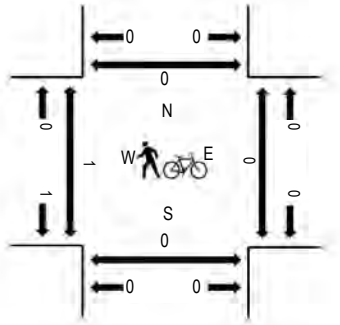
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	7.4%	0.75
WB	0.0%	0.00
NB	4.3%	0.84
SB	2.0%	0.82
All	3.7%	0.92

Traffic Counts - All Vehicles

Interval Start Time	FIREHOUSE RD Eastbound				FIREHOUSE RD Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM	0	5	0	2	0	0	0	0	0	1	52	0	0	1	38	3	102	429
3:15 PM	0	5	0	0	0	0	0	0	0	2	61	0	0	0	26	3	97	419
3:30 PM	0	6	0	0	0	0	0	0	0	0	76	0	0	0	30	2	114	422
3:45 PM	0	7	0	2	0	0	0	0	0	1	61	0	0	0	42	3	116	410
4:00 PM	0	4	0	1	0	0	0	0	0	0	59	0	0	0	24	4	92	400
4:15 PM	0	4	0	1	0	0	0	1	0	1	44	0	0	0	44	5	100	400
4:30 PM	0	10	0	4	0	0	0	0	0	0	47	0	0	0	37	4	102	393
4:45 PM	0	8	0	2	0	0	0	0	0	0	56	0	0	0	38	2	106	381
5:00 PM	0	5	0	0	0	0	0	0	0	0	55	0	0	0	32	0	92	346
5:15 PM	0	5	0	0	0	0	0	0	0	1	55	0	0	0	30	2	93	
5:30 PM	0	1	0	1	0	0	0	0	0	0	55	0	0	0	33	0	90	
5:45 PM	0	4	0	3	0	0	0	0	0	0	41	0	0	0	22	1	71	
Count Total	0	64	0	16	0	0	0	1	0	6	662	0	0	1	396	29	1,175	
Peak Hour	0	23	0	4	0	0	0	0	0	4	250	0	0	1	136	11	429	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	1	0	1	3	3:00 PM	0	0	0	0	0
3:15 PM	0	3	0	2	5	3:15 PM	0	0	0	0	0
3:30 PM	0	3	0	0	3	3:30 PM	1	0	0	0	1
3:45 PM	1	4	0	0	5	3:45 PM	0	0	0	0	0
4:00 PM	0	3	0	1	4	4:00 PM	0	0	0	0	0
4:15 PM	0	1	0	1	2	4:15 PM	0	0	0	0	0
4:30 PM	2	1	0	0	3	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	1	1	4:45 PM	0	0	0	0	0
5:00 PM	0	1	0	0	1	5:00 PM	0	0	0	0	0

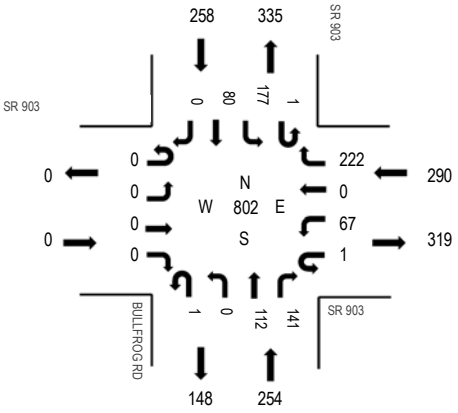
5:15 PM	0	0	0	2	2	5:15 PM	0	0	0	0	0
5:30 PM	0	0	0	0	0	5:30 PM	0	0	0	0	0
5:45 PM	1	0	0	0	1	5:45 PM	0	0	0	0	0
Count Total	5	17	0	8	30	Count Total	1	0	0	0	1
Peak Hour	2	11	0	3	16	Peak Hour	1	0	0	0	1

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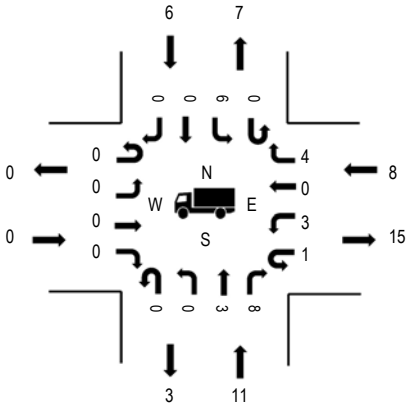
Location: 6 BULLFROG RD & SR 903 PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

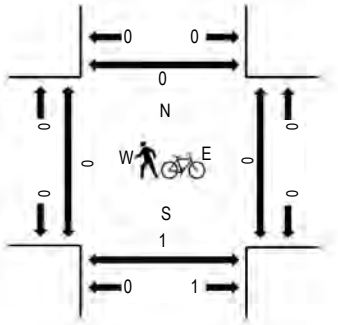
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	2.8%	0.86
NB	4.3%	0.91
SB	2.3%	0.95
All	3.1%	0.95

Traffic Counts - All Vehicles

Interval Start Time	SR 903 Eastbound				SR 903 Westbound				BULLFROG RD Northbound				SR 903 Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	0	0	0	22	0	46	0	0	30	26	0	42	20	0	186	802
3:15 PM	0	0	0	0	0	11	0	60	0	0	28	36	0	52	14	0	201	780
3:30 PM	0	0	0	0	1	12	0	54	0	0	27	43	1	43	24	0	205	734
3:45 PM	0	0	0	0	0	22	0	62	1	0	27	36	0	40	22	0	210	733
4:00 PM	0	0	0	0	0	13	0	39	0	0	20	35	0	46	11	0	164	711
4:15 PM	0	0	0	0	0	22	0	27	1	0	16	27	1	40	21	0	155	738
4:30 PM	0	0	0	0	0	13	0	56	0	0	35	27	1	48	24	0	204	769
4:45 PM	0	0	0	0	0	12	0	49	1	0	28	32	0	44	22	0	188	749
5:00 PM	0	0	0	0	0	13	0	56	0	0	25	32	0	44	21	0	191	701
5:15 PM	0	0	0	0	0	9	0	58	0	0	32	34	0	31	22	0	186	
5:30 PM	0	0	0	0	0	15	0	41	0	0	39	18	0	55	16	0	184	
5:45 PM	0	0	0	0	0	11	0	40	0	0	23	19	0	31	16	0	140	
Count Total	0	0	0	0	1	175	0	588	3	0	330	365	3	516	233	0	2,214	
Peak Hour	0	0	0	0	1	67	0	222	1	0	112	141	1	177	80	0	802	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	1	1	0	2	3:00 PM	0	1	0	0	1
3:15 PM	0	3	3	1	7	3:15 PM	0	0	0	0	0
3:30 PM	0	3	4	3	10	3:30 PM	0	0	0	0	0
3:45 PM	0	4	0	2	6	3:45 PM	0	0	0	0	0
4:00 PM	0	4	3	0	7	4:00 PM	0	0	0	0	0
4:15 PM	0	0	1	1	2	4:15 PM	0	0	0	0	0
4:30 PM	0	3	1	2	6	4:30 PM	0	1	0	0	1
4:45 PM	0	0	0	1	1	4:45 PM	0	0	0	0	0
5:00 PM	0	0	1	3	4	5:00 PM	0	0	0	0	0

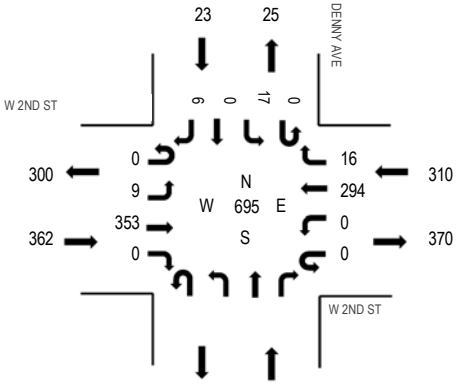
5:15 PM	0	0	0	1	1	5:15 PM	0	0	0	0	0
5:30 PM	0	1	1	0	2	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	1	1	5:45 PM	0	0	0	0	0
Count Total	0	19	15	15	49	Count Total	0	2	0	0	2
Peak Hour	0	11	8	6	25	Peak Hour	0	1	0	0	1

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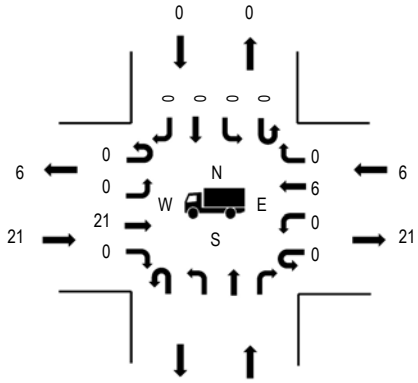
Location: 7 DENNY AVE & W 2ND ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

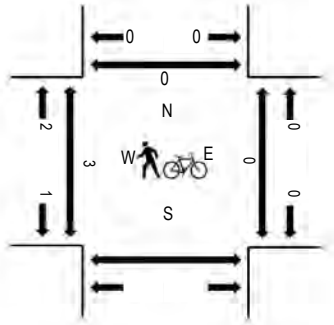
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.8%	0.92
WB	1.9%	0.91
NB		
SB	0.0%	0.86
All	3.9%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				Northbound				DENNY AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	1	81	0	0	0	67	2					0	1	0	0	152	695
3:15 PM	0	6	87	0	0	0	72	5					0	6	0	1	177	695
3:30 PM	0	1	98	0	0	0	72	7					0	6	0	2	186	663
3:45 PM	0	1	87	0	0	0	83	2					0	4	0	3	180	637
4:00 PM	0	6	78	0	0	0	54	5					0	8	0	1	152	622
4:15 PM	0	3	76	0	0	0	58	3					0	4	0	1	145	624
4:30 PM	0	3	70	0	0	0	65	7					0	11	0	4	160	631
4:45 PM	0	4	84	0	0	0	65	6					0	4	0	2	165	619
5:00 PM	0	0	75	0	0	0	67	7					0	4	0	1	154	580
5:15 PM	0	2	69	0	0	0	66	7					0	4	0	4	152	
5:30 PM	0	0	79	0	0	0	61	5					0	3	0	0	148	
5:45 PM	0	1	54	0	0	0	55	8					0	6	0	2	126	
Count Total	0	28	938	0	0	0	785	64					0	61	0	21	1,897	
Peak Hour	0	9	353	0	0	0	294	16					0	17	0	6	695	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	4		0	0	4	3:00 PM	1		0	0	1
3:15 PM	5		3	0	8	3:15 PM	1		0	0	1
3:30 PM	7		2	0	9	3:30 PM	0		0	0	0
3:45 PM	5		1	0	6	3:45 PM	1		0	0	1
4:00 PM	3		3	0	6	4:00 PM	0		0	0	0
4:15 PM	1		2	0	3	4:15 PM	0		0	0	0
4:30 PM	5		0	0	5	4:30 PM	0		0	0	0
4:45 PM	1		0	0	1	4:45 PM	0		0	0	0
5:00 PM	3		1	0	4	5:00 PM	0		0	0	0

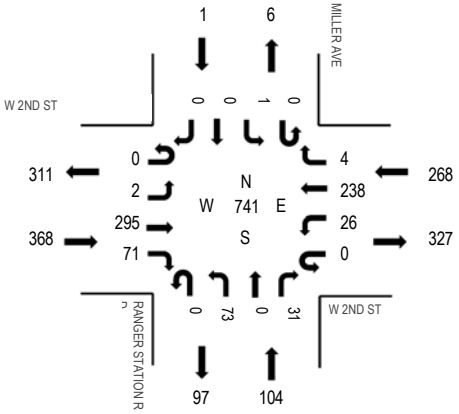
5:15 PM	0	0	0	0	5:15 PM	1	0	0	1
5:30 PM	2	1	0	3	5:30 PM	0	0	0	0
5:45 PM	1	0	0	1	5:45 PM	0	0	0	0
Count Total	37	13	0	50	Count Total	4	0	0	4
Peak Hour	21	6	0	27	Peak Hour	3	0	0	3

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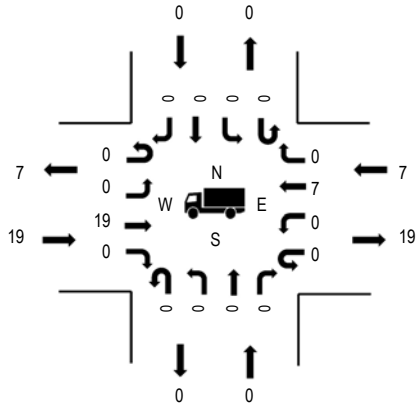
Location: 8 RANGER STATION RD & W 2ND ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

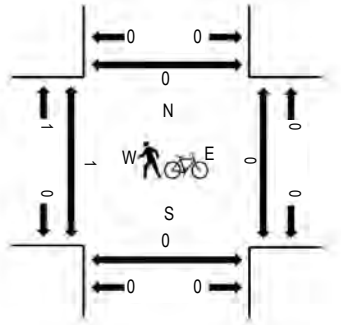
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.2%	0.90
WB	2.6%	0.91
NB	0.0%	0.96
SB	0.0%	0.25
All	3.5%	0.94

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				RANGER STATION RD Northbound				MILLER AVE Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM	0	1	64	22	0	8	51	0	0	18	0	9	0	1	0	0	174	741
3:15 PM	0	1	76	14	0	3	61	1	0	19	0	7	0	0	0	0	182	731
3:30 PM	0	0	80	22	0	9	59	2	0	18	0	7	0	0	0	0	197	701
3:45 PM	0	0	75	13	0	6	67	1	0	18	0	8	0	0	0	0	188	676
4:00 PM	0	0	77	16	0	4	38	0	0	19	0	10	0	0	0	0	164	657
4:15 PM	0	0	63	18	0	3	53	0	0	11	0	3	0	0	1	0	152	653
4:30 PM	0	0	66	17	0	3	57	1	0	17	0	11	0	0	0	0	172	664
4:45 PM	0	0	78	8	0	7	52	0	0	20	0	4	0	0	0	0	169	654
5:00 PM	0	0	59	13	0	3	62	0	0	15	0	8	0	0	0	0	160	620
5:15 PM	0	1	73	9	0	2	56	0	0	15	0	6	0	0	0	1	163	
5:30 PM	0	0	60	21	0	3	53	1	0	15	0	9	0	0	0	0	162	
5:45 PM	0	0	46	15	0	5	46	0	0	17	0	6	0	0	0	0	135	
Count Total	0	3	817	188	0	56	655	6	0	202	0	88	0	1	1	1	2,018	
Peak Hour	0	2	295	71	0	26	238	4	0	73	0	31	0	1	0	0	741	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	5	0	1	0	6	3:00 PM	0	0	0	0	0
3:15 PM	4	0	3	0	7	3:15 PM	0	0	0	0	0
3:30 PM	5	0	2	0	7	3:30 PM	0	0	0	0	0
3:45 PM	5	0	1	0	6	3:45 PM	1	0	0	0	1
4:00 PM	4	1	2	0	7	4:00 PM	0	3	0	0	3
4:15 PM	1	0	1	0	2	4:15 PM	0	2	0	0	2
4:30 PM	4	0	1	0	5	4:30 PM	0	1	0	0	1
4:45 PM	2	0	0	0	2	4:45 PM	0	0	0	0	0
5:00 PM	3	0	1	0	4	5:00 PM	0	0	0	0	0

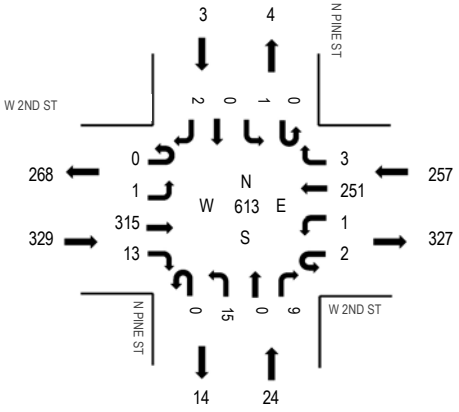
5:15 PM	0	0	0	0	0	5:15 PM	0	2	0	0	2
5:30 PM	2	0	1	0	3	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0	5:45 PM	0	0	0	0	0
Count Total	35	1	13	0	49	Count Total	1	8	0	0	9
Peak Hour	19	0	7	0	26	Peak Hour	1	0	0	0	1

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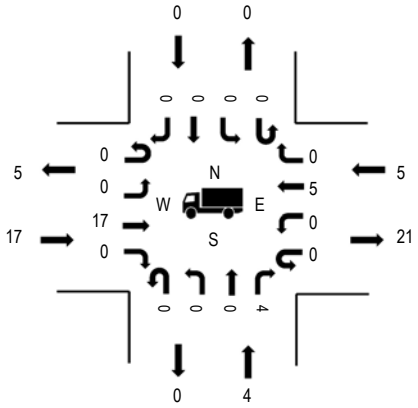
Location: 9 N PINE ST & W 2ND ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

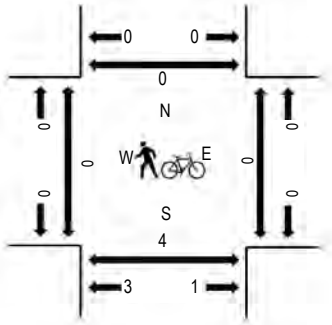
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.2%	0.93
WB	1.9%	0.92
NB	16.7%	0.43
SB	0.0%	0.75
All	4.2%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N PINE ST Northbound				N PINE ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	71	1	1	0	56	2	0	1	0	0	0	0	0	1	133	613
3:15 PM	0	1	82	2	0	0	61	0	0	3	0	1	0	0	0	1	151	611
3:30 PM	0	0	83	5	1	0	68	1	0	2	0	3	0	1	0	0	164	588
3:45 PM	0	0	79	5	0	1	66	0	0	9	0	5	0	0	0	0	165	566
4:00 PM	0	0	82	4	0	1	41	0	0	2	0	1	0	0	0	0	131	548
4:15 PM	0	1	64	1	0	1	48	0	0	9	1	3	0	0	0	0	128	556
4:30 PM	0	0	70	7	0	2	55	0	0	5	0	2	0	0	1	0	142	574
4:45 PM	0	1	75	7	0	2	53	0	0	4	0	2	0	2	0	1	147	562
5:00 PM	0	1	64	1	0	4	56	2	0	8	1	1	0	0	0	1	139	527
5:15 PM	0	0	76	5	0	0	56	1	0	3	0	3	0	2	0	0	146	
5:30 PM	0	1	64	4	0	2	49	1	0	7	0	2	0	0	0	0	130	
5:45 PM	0	0	50	5	0	1	48	0	0	4	1	2	0	1	0	0	112	
Count Total	0	5	860	47	2	14	657	7	0	57	3	25	0	6	1	4	1,688	
Peak Hour	0	1	315	13	2	1	251	3	0	15	0	9	0	1	0	2	613	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	3	0	1	0	4	3:00 PM	0	0	0	0	0
3:15 PM	4	0	3	0	7	3:15 PM	0	2	0	0	2
3:30 PM	4	2	1	0	7	3:30 PM	0	0	0	0	0
3:45 PM	6	2	0	0	8	3:45 PM	0	2	0	0	2
4:00 PM	4	0	2	0	6	4:00 PM	0	1	0	0	1
4:15 PM	1	0	1	0	2	4:15 PM	0	0	0	0	0
4:30 PM	5	0	0	0	5	4:30 PM	0	1	0	0	1
4:45 PM	1	0	0	0	1	4:45 PM	0	0	0	0	0
5:00 PM	1	0	1	0	2	5:00 PM	0	0	0	0	0

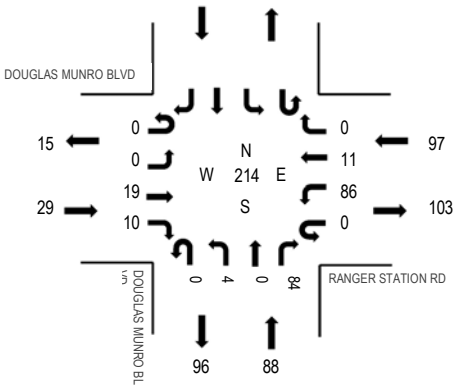
5:15 PM	0	0	1	0	1	5:15 PM	0	2	5	0	7
5:30 PM	1	0	1	0	2	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0	5:45 PM	0	0	0	0	0
Count Total	30	4	11	0	45	Count Total	0	8	5	0	13
Peak Hour	17	4	5	0	26	Peak Hour	0	4	0	0	4

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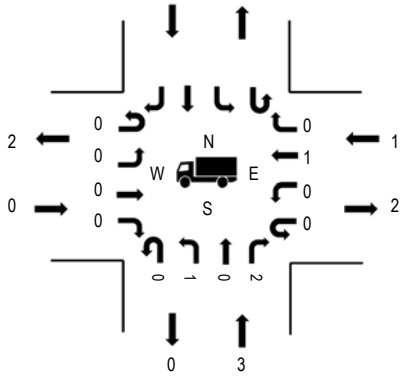
Location: 10 DOUGLAS MUNRO BLVD & RANGER STATION RD PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

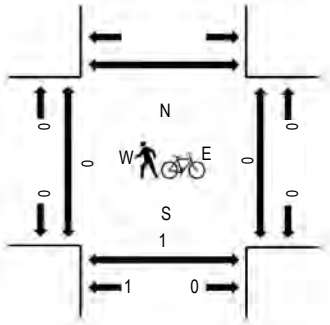
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.60
WB	1.0%	0.78
NB	3.4%	0.85
SB		
All	1.9%	0.86

Traffic Counts - All Vehicles

Interval Start Time	DOUGLAS MUNRO BLVD Eastbound				RANGER STATION RD Westbound				DOUGLAS MUNRO BLVD Northbound				Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	4	0	0	28	3	0	0	0	0	23					58	214
3:15 PM	0	0	7	5	0	19	1	0	0	2	0	17					51	208
3:30 PM	0	0	3	4	0	23	6	0	0	1	0	25					62	196
3:45 PM	0	0	5	1	0	16	1	0	0	1	0	19					43	178
4:00 PM	0	0	4	4	0	18	1	0	0	0	0	25					52	184
4:15 PM	0	0	4	2	0	21	2	0	0	3	0	7					39	167
4:30 PM	0	0	4	2	0	18	1	0	0	1	0	18					44	166
4:45 PM	0	0	5	1	0	17	0	0	0	0	0	26					49	167
5:00 PM	0	0	5	0	0	15	2	0	0	1	0	12					35	162
5:15 PM	0	0	3	4	0	11	1	0	0	2	0	17					38	
5:30 PM	0	0	3	1	0	21	2	0	0	0	0	18					45	
5:45 PM	0	0	5	0	0	18	2	0	0	0	0	19					44	
Count Total	0	0	52	24	0	225	22	0	0	11	0	226					560	
Peak Hour	0	0	19	10	0	86	11	0	0	4	0	84					214	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles EB	NB	WB	SB	Total	Interval Start Time	Pedestrians/Bicycles on Crosswalk EB	NB	WB	SB	Total
3:00 PM	0	0	0		0	3:00 PM	0	0	0		0
3:15 PM	0	1	0		1	3:15 PM	0	0	0		0
3:30 PM	0	2	1		3	3:30 PM	0	0	0		0
3:45 PM	0	0	0		0	3:45 PM	0	1	0		1
4:00 PM	0	1	0		1	4:00 PM	0	0	0		0
4:15 PM	0	0	0		0	4:15 PM	0	1	0		1
4:30 PM	0	0	0		0	4:30 PM	0	0	0		0
4:45 PM	0	2	0		2	4:45 PM	0	0	0		0
5:00 PM	0	0	2		2	5:00 PM	0	0	0		0

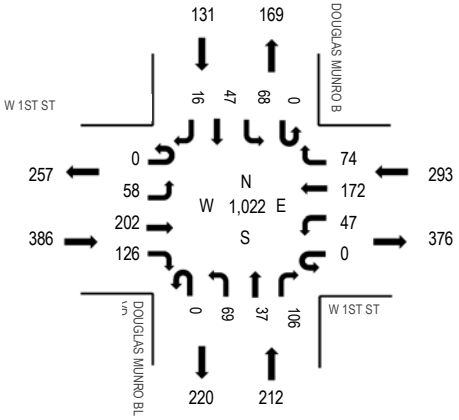
5:15 PM	0	0	0	0	5:15 PM	0	0	0	0
5:30 PM	0	0	0	0	5:30 PM	0	0	0	0
5:45 PM	0	0	0	0	5:45 PM	0	0	0	0
Count Total	0	6	3	9	Count Total	0	2	0	2
Peak Hour	0	3	1	4	Peak Hour	0	1	0	1

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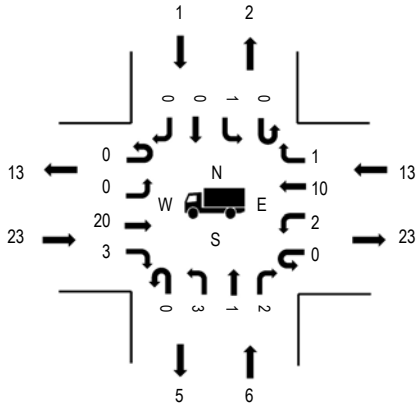
Location: 11 DOUGLAS MUNRO BLVD & W 1ST ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

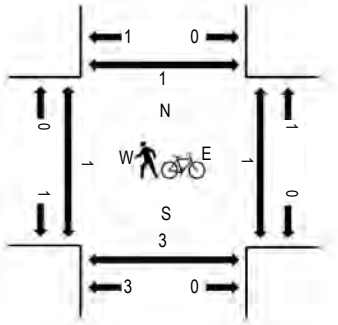
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	6.0%	0.83
WB	4.4%	0.86
NB	2.8%	0.88
SB	0.8%	0.84
All	4.2%	0.91

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				DOUGLAS MUNRO BLVD Northbound				DOUGLAS MUNRO BLVD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	7	46	23	0	10	43	21	0	16	9	18	0	15	18	2	228	999
3:15 PM	0	20	56	40	0	13	49	23	0	17	4	27	0	16	9	8	282	1,022
3:30 PM	0	11	54	30	0	12	35	15	0	15	9	30	0	20	16	3	250	953
3:45 PM	0	10	41	25	0	11	45	18	0	17	10	33	0	16	11	2	239	952
4:00 PM	0	17	51	31	0	11	43	18	0	20	14	16	0	16	11	3	251	925
4:15 PM	0	5	47	16	0	7	38	16	0	16	8	32	0	9	17	2	213	893
4:30 PM	0	21	70	29	0	12	39	13	0	13	6	22	0	8	13	3	249	890
4:45 PM	0	10	55	20	0	10	32	13	0	13	14	17	0	17	10	1	212	845
5:00 PM	0	12	47	21	0	6	50	13	0	13	9	24	0	13	10	1	219	834
5:15 PM	0	15	34	24	0	11	32	9	0	16	12	22	0	21	11	3	210	
5:30 PM	0	12	38	17	0	6	32	17	0	10	8	29	0	17	15	3	204	
5:45 PM	0	8	49	30	0	9	29	12	0	7	10	20	0	13	13	1	201	
Count Total	0	148	588	306	0	118	467	188	0	173	113	290	0	181	154	32	2,758	
Peak Hour	0	58	202	126	0	47	172	74	0	69	37	106	0	68	47	16	1,022	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	8	1	7	0	16	3:00 PM	0	1	0	0	1
3:15 PM	12	1	6	1	20	3:15 PM	0	1	0	0	1
3:30 PM	5	4	1	0	10	3:30 PM	0	0	1	1	2
3:45 PM	3	0	4	0	7	3:45 PM	1	2	0	0	3
4:00 PM	3	1	2	0	6	4:00 PM	0	0	0	0	0
4:15 PM	4	0	2	0	6	4:15 PM	0	0	0	0	0
4:30 PM	7	1	3	0	11	4:30 PM	0	0	0	0	0
4:45 PM	2	1	2	0	5	4:45 PM	0	2	0	0	2
5:00 PM	6	0	3	0	9	5:00 PM	0	0	0	2	2

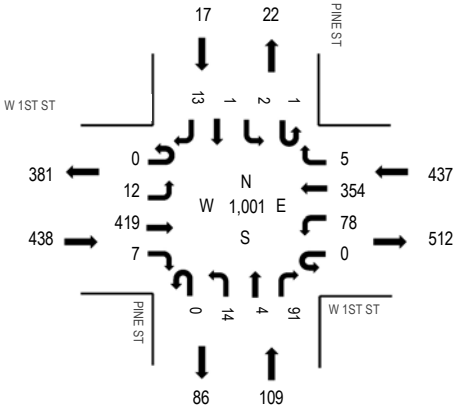
5:15 PM	2	0	1	2	5	5:15 PM	0	0	0	0	0
5:30 PM	3	0	2	0	5	5:30 PM	0	0	0	0	0
5:45 PM	4	0	2	0	6	5:45 PM	0	0	0	0	0
Count Total	59	9	35	3	106	Count Total	1	6	1	3	11
Peak Hour	23	6	13	1	43	Peak Hour	1	3	1	1	6

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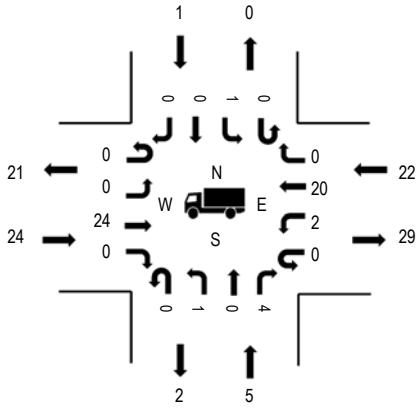
Location: 12 PINE ST & W 1ST ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

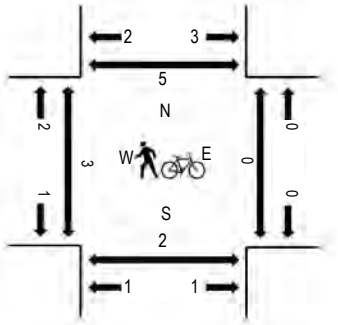
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.5%	0.90
WB	5.0%	0.94
NB	4.6%	0.78
SB	5.9%	0.71
All	5.2%	0.90

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				PINE ST Northbound				PINE ST Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM	0	0	89	3	0	20	94	0	0	6	0	20	0	1	0	0	233	1,001
3:15 PM	0	2	108	0	0	15	89	1	0	0	2	20	0	1	0	3	241	990
3:30 PM	0	1	119	2	0	27	87	2	0	3	0	32	1	0	0	5	279	964
3:45 PM	0	9	103	2	0	16	84	2	0	5	2	19	0	0	1	5	248	933
4:00 PM	0	3	89	1	0	17	77	0	0	5	0	26	0	1	1	2	222	915
4:15 PM	0	10	87	2	0	17	68	1	0	3	4	20	0	0	1	2	215	939
4:30 PM	0	3	111	3	0	14	80	2	0	2	1	20	0	3	1	8	248	932
4:45 PM	0	4	101	0	0	19	68	0	0	3	2	21	0	3	2	7	230	882
5:00 PM	0	8	103	1	0	17	78	0	0	2	3	30	0	0	0	4	246	869
5:15 PM	0	3	84	2	0	12	79	1	0	1	3	20	0	1	1	1	208	
5:30 PM	0	5	90	1	0	12	59	4	0	2	0	19	0	0	4	2	198	
5:45 PM	0	4	96	1	0	12	66	0	0	3	3	24	0	3	1	4	217	
Count Total	0	52	1,180	18	0	198	929	13	0	35	20	271	1	13	12	43	2,785	
Peak Hour	0	12	419	7	0	78	354	5	0	14	4	91	1	2	1	13	1,001	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	5	0	9	1	15	3:00 PM	3	1	0	5	9
3:15 PM	11	1	7	0	19	3:15 PM	0	1	0	0	1
3:30 PM	5	3	3	0	11	3:30 PM	0	0	0	0	0
3:45 PM	3	1	3	0	7	3:45 PM	0	0	0	0	0
4:00 PM	3	1	2	1	7	4:00 PM	0	0	0	0	0
4:15 PM	5	0	3	0	8	4:15 PM	0	0	0	0	0
4:30 PM	6	0	3	0	9	4:30 PM	0	0	0	0	0
4:45 PM	3	1	3	0	7	4:45 PM	0	0	0	0	0
5:00 PM	5	0	3	0	8	5:00 PM	0	1	0	0	1

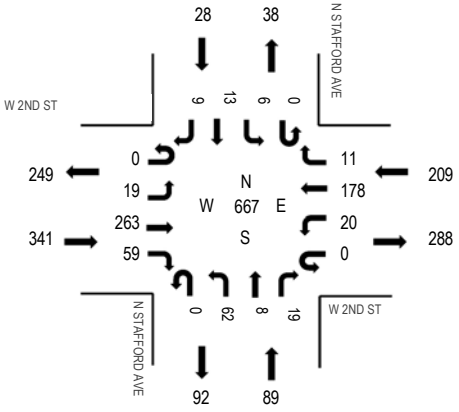
5:15 PM	2	0	1	0	3	5:15 PM	0	0	0	0	0
5:30 PM	3	0	3	0	6	5:30 PM	1	1	0	0	2
5:45 PM	2	0	2	0	4	5:45 PM	0	1	0	0	1
Count Total	53	7	42	2	104	Count Total	4	5	0	5	14
Peak Hour	24	5	22	1	52	Peak Hour	3	2	0	5	10

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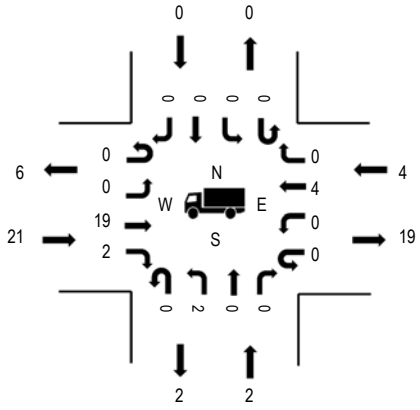
Location: 13 N STAFFORD AVE & W 2ND ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

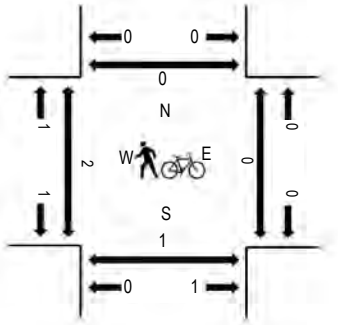
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	6.2%	0.97
WB	1.9%	0.86
NB	2.2%	0.86
SB	0.0%	0.78
All	4.0%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N STAFFORD AVE Northbound				N STAFFORD AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	3	47	21	0	7	39	0	0	14	2	2	0	1	6	3	145	651
3:15 PM	0	3	67	10	0	3	38	2	0	19	1	5	0	2	2	3	155	667
3:30 PM	0	6	63	19	0	4	52	3	0	18	5	3	0	0	2	4	179	643
3:45 PM	0	6	66	13	0	8	51	2	0	15	0	5	0	2	3	1	172	610
4:00 PM	0	4	67	17	0	5	37	4	0	10	2	6	0	2	6	1	161	597
4:15 PM	0	3	46	14	0	5	39	2	0	10	3	4	0	2	1	2	131	589
4:30 PM	0	2	45	24	0	7	34	0	0	15	2	3	0	0	4	10	146	621
4:45 PM	0	4	58	18	0	9	40	1	0	12	5	7	0	0	1	4	159	611
5:00 PM	0	3	47	17	0	5	48	2	0	11	2	7	0	3	3	5	153	569
5:15 PM	0	2	61	22	0	6	48	2	0	11	1	6	0	1	3	0	163	
5:30 PM	0	1	53	15	0	3	40	1	0	12	4	4	0	0	2	1	136	
5:45 PM	0	0	35	11	0	5	36	3	0	12	3	6	0	0	3	3	117	
Count Total	0	37	655	201	0	67	502	22	0	159	30	58	0	13	36	37	1,817	
Peak Hour	0	19	263	59	0	20	178	11	0	62	8	19	0	6	13	9	667	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	3	0	0	0	3	3:00 PM	0	0	0	0	0
3:15 PM	4	1	2	0	7	3:15 PM	1	0	0	0	1
3:30 PM	6	0	1	0	7	3:30 PM	0	0	0	0	0
3:45 PM	7	1	0	0	8	3:45 PM	0	1	0	0	1
4:00 PM	4	0	1	0	5	4:00 PM	1	0	0	0	1
4:15 PM	1	0	1	0	2	4:15 PM	0	0	0	0	0
4:30 PM	4	1	1	0	6	4:30 PM	0	0	0	0	0
4:45 PM	3	0	1	0	4	4:45 PM	0	1	0	0	1
5:00 PM	1	1	1	0	3	5:00 PM	0	1	0	0	1

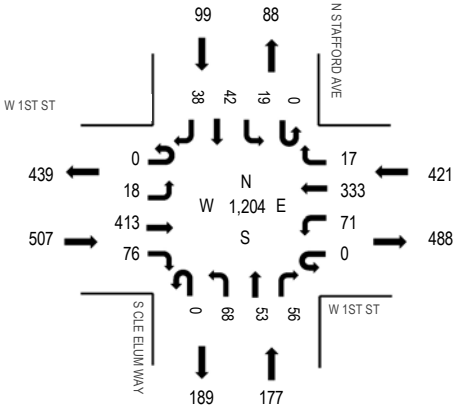
5:15 PM	0	0	1	0	1	5:15 PM	0	0	0	0	0
5:30 PM	0	0	1	0	1	5:30 PM	3	0	0	0	3
5:45 PM	0	1	0	0	1	5:45 PM	0	0	0	2	2
Count Total	33	5	10	0	48	Count Total	5	3	0	2	10
Peak Hour	21	2	4	0	27	Peak Hour	2	1	0	0	3

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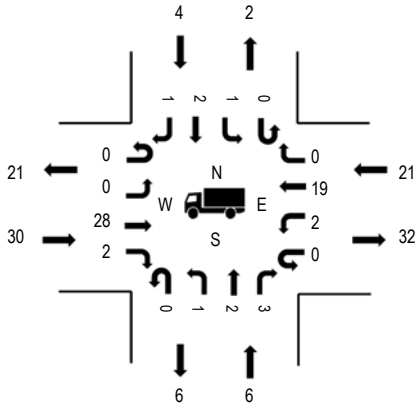
Location: 14 S CLE ELUM WAY & W 1ST ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

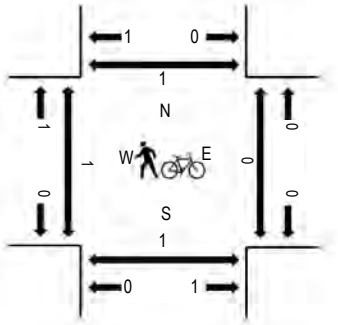
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.9%	0.83
WB	5.0%	0.88
NB	3.4%	0.90
SB	4.0%	0.73
All	5.1%	0.87

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				S CLE ELUM WAY Northbound				N STAFFORD AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	6	90	15	0	19	86	2	0	18	9	16	0	4	14	16	295	1,204
3:15 PM	0	1	106	17	0	15	75	9	0	16	15	13	0	4	5	6	282	1,186
3:30 PM	0	8	124	21	0	20	96	3	0	20	15	14	0	3	13	8	345	1,166
3:45 PM	0	3	93	23	0	17	76	3	0	14	14	13	0	8	10	8	282	1,128
4:00 PM	0	6	89	25	0	14	70	6	0	18	8	17	0	2	13	9	277	1,136
4:15 PM	0	6	83	24	0	15	68	5	0	14	7	19	0	5	11	5	262	1,156
4:30 PM	0	3	101	26	0	15	76	4	0	14	11	23	0	10	16	8	307	1,148
4:45 PM	0	8	97	22	0	16	63	1	0	16	16	21	0	6	16	8	290	1,100
5:00 PM	0	5	101	27	0	12	85	6	0	12	8	18	0	8	13	2	297	1,061
5:15 PM	0	8	80	17	0	13	58	4	0	20	7	12	0	8	20	7	254	
5:30 PM	0	9	81	23	0	15	63	5	0	14	7	21	0	6	14	1	259	
5:45 PM	0	5	90	22	0	13	60	6	0	11	12	12	0	1	13	6	251	
Count Total	0	68	1,135	262	0	184	876	54	0	187	129	199	0	65	158	84	3,401	
Peak Hour	0	18	413	76	0	71	333	17	0	68	53	56	0	19	42	38	1,204	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	6	2	8	2	18	3:00 PM	0	0	0	0	0
3:15 PM	12	3	6	0	21	3:15 PM	0	0	0	0	0
3:30 PM	9	0	4	2	15	3:30 PM	0	1	0	0	1
3:45 PM	3	1	3	0	7	3:45 PM	1	0	0	1	2
4:00 PM	6	1	4	0	11	4:00 PM	0	0	0	0	0
4:15 PM	4	1	1	1	7	4:15 PM	3	2	1	3	9
4:30 PM	6	4	4	0	14	4:30 PM	0	1	3	5	9
4:45 PM	3	0	4	0	7	4:45 PM	0	1	0	0	1
5:00 PM	6	0	4	0	10	5:00 PM	0	0	0	0	0

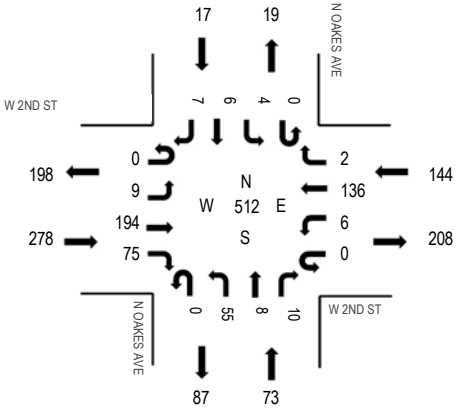
5:15 PM	3	0	0	1	4	5:15 PM	1	0	0	0	1
5:30 PM	3	1	2	1	7	5:30 PM	0	1	0	0	1
5:45 PM	2	0	3	0	5	5:45 PM	0	2	0	0	2
Count Total	63	13	43	7	126	Count Total	5	8	4	9	26
Peak Hour	30	6	21	4	61	Peak Hour	1	1	0	1	3

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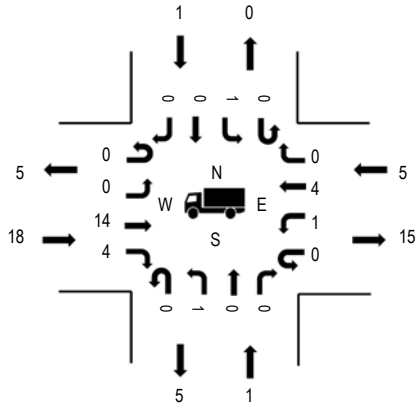
Location: 15 N OAKES AVE & W 2ND ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

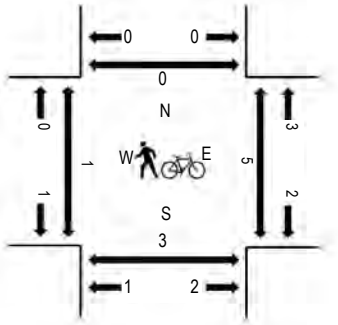
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	6.5%	0.97
WB	3.5%	0.75
NB	1.4%	0.79
SB	5.9%	0.71
All	4.9%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N OAKES AVE Northbound				N OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	2	34	15	0	5	33	0	0	13	2	4	0	0	1	1	110	501
3:15 PM	0	1	53	17	0	2	20	1	0	16	1	5	0	1	4	1	122	512
3:30 PM	0	0	42	23	0	2	45	1	0	14	3	1	0	0	0	0	131	496
3:45 PM	0	2	51	17	0	2	38	0	0	16	3	4	0	3	0	2	138	466
4:00 PM	0	6	48	18	0	0	33	0	0	9	1	0	0	0	2	4	121	440
4:15 PM	0	2	35	12	0	3	30	1	0	17	0	4	0	1	1	0	106	436
4:30 PM	0	6	29	14	0	2	29	0	0	12	1	1	0	1	4	2	101	452
4:45 PM	0	1	47	11	0	4	30	0	0	15	3	1	0	0	0	0	112	451
5:00 PM	0	2	38	13	0	2	32	2	0	21	4	3	0	0	0	0	117	443
5:15 PM	0	4	50	10	0	1	26	2	0	21	2	0	0	1	2	3	122	
5:30 PM	0	1	45	11	0	0	25	0	0	16	0	1	0	0	0	1	100	
5:45 PM	0	1	34	9	0	2	32	0	0	16	1	3	0	1	4	1	104	
Count Total	0	28	506	170	0	25	373	7	0	186	21	27	0	8	18	15	1,384	
Peak Hour	0	9	194	75	0	6	136	2	0	55	8	10	0	4	6	7	512	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	0	1	1	3	3:00 PM	0	0	1	0	1
3:15 PM	4	0	3	0	7	3:15 PM	0	0	4	0	4
3:30 PM	5	1	1	0	7	3:30 PM	1	2	0	0	3
3:45 PM	6	0	0	1	7	3:45 PM	0	0	1	0	1
4:00 PM	3	0	1	0	4	4:00 PM	0	1	0	0	1
4:15 PM	0	2	0	0	2	4:15 PM	0	0	0	0	0
4:30 PM	4	1	0	0	5	4:30 PM	0	0	0	0	0
4:45 PM	2	0	0	0	2	4:45 PM	0	0	0	0	0
5:00 PM	1	0	1	0	2	5:00 PM	0	1	1	0	2

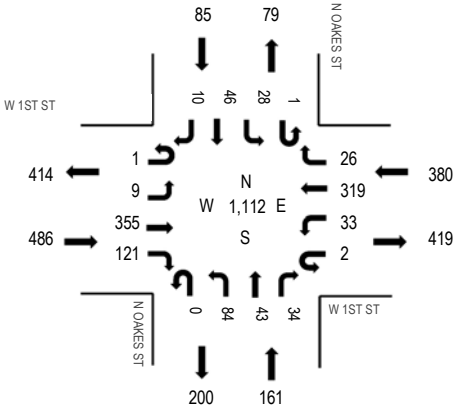
5:15 PM	0	0	1	0	1	5:15 PM	0	0	0	1	1
5:30 PM	0	1	0	0	1	5:30 PM	1	0	0	1	2
5:45 PM	1	0	0	0	1	5:45 PM	1	0	0	0	1
Count Total	27	5	8	2	42	Count Total	3	4	7	2	16
Peak Hour	18	1	5	1	25	Peak Hour	1	3	5	0	9

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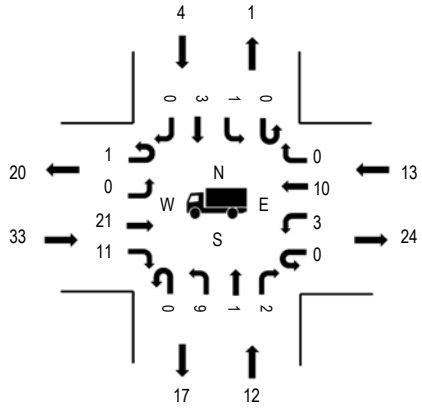
Location: 16 N OAKES ST & W 1ST ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

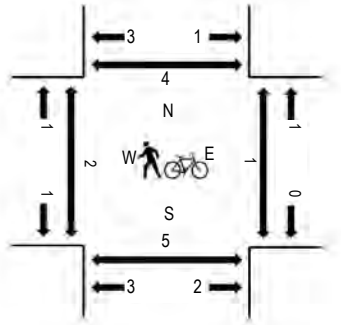
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	6.8%	0.93
WB	3.4%	0.96
NB	7.5%	0.96
SB	4.7%	0.85
All	5.6%	0.94

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				N OAKES ST Northbound				N OAKES ST Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM	1	2	78	30	1	8	81	9	0	22	10	5	0	7	10	5	269	1,112
3:15 PM	0	4	88	32	1	9	81	6	0	21	10	10	1	6	12	1	282	1,062
3:30 PM	0	2	101	28	0	8	87	3	0	23	11	8	0	11	12	2	296	1,000
3:45 PM	0	1	88	31	0	8	70	8	0	18	12	11	0	4	12	2	265	959
4:00 PM	0	1	65	23	0	7	70	4	0	20	5	3	0	8	10	3	219	946
4:15 PM	0	1	75	23	0	3	59	8	0	19	12	4	0	5	9	2	220	1,019
4:30 PM	0	2	95	22	0	6	79	6	0	13	5	6	0	5	11	5	255	1,022
4:45 PM	0	4	100	22	0	7	67	7	0	10	10	8	0	3	10	4	252	993
5:00 PM	0	3	89	34	0	8	86	8	0	19	17	13	0	4	8	3	292	976
5:15 PM	0	1	73	22	0	4	65	10	0	17	11	5	0	2	8	5	223	
5:30 PM	0	1	87	27	0	2	56	6	0	18	11	6	0	6	5	1	226	
5:45 PM	0	5	87	16	0	15	63	3	0	16	13	3	0	8	4	2	235	
Count Total	1	27	1,026	310	2	85	864	78	0	216	127	82	1	69	111	35	3,034	
Peak Hour	1	9	355	121	2	33	319	26	0	84	43	34	1	28	46	10	1,112	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	10	3	4	1	18	3:00 PM	0	0	0	0	0
3:15 PM	12	3	6	1	22	3:15 PM	0	0	0	1	1
3:30 PM	7	3	2	1	13	3:30 PM	0	4	0	1	5
3:45 PM	4	3	1	1	9	3:45 PM	2	1	1	2	6
4:00 PM	5	1	3	1	10	4:00 PM	0	1	0	1	2
4:15 PM	4	2	2	0	8	4:15 PM	1	5	4	2	12
4:30 PM	5	2	0	2	9	4:30 PM	0	4	1	5	10
4:45 PM	2	1	1	2	6	4:45 PM	0	0	0	1	1
5:00 PM	1	1	4	0	6	5:00 PM	2	1	1	0	4

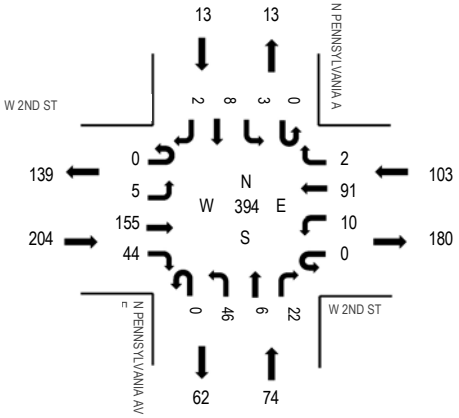
5:15 PM	2	0	0	0	2	5:15 PM	0	13	3	2	18
5:30 PM	3	1	2	0	6	5:30 PM	0	0	0	3	3
5:45 PM	2	1	3	0	6	5:45 PM	1	4	0	2	7
Count Total	57	21	28	9	115	Count Total	6	33	10	20	69
Peak Hour	33	12	13	4	62	Peak Hour	2	5	1	4	12

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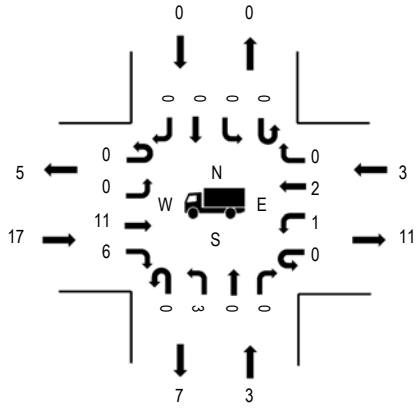
Location: 17 N PENNSYLVANIA AVE & W 2ND ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

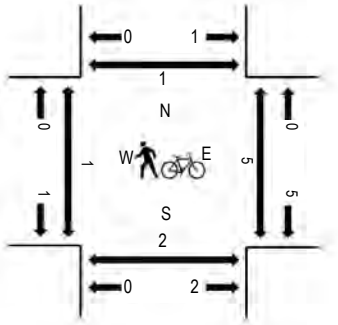
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	8.3%	0.88
WB	2.9%	0.74
NB	4.1%	0.77
SB	0.0%	0.65
All	5.8%	0.94

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N PENNSYLVANIA AVE Northbound				N PENNSYLVANIA AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	1	2	23	13	0	3	23	1	0	11	2	3	0	1	0	3	86	388
3:15 PM	0	3	44	11	0	3	15	0	0	7	1	8	0	0	4	1	97	394
3:30 PM	0	0	35	7	0	2	33	0	0	14	2	5	0	0	2	0	100	379
3:45 PM	0	1	39	15	0	3	20	1	0	17	2	5	0	1	1	0	105	354
4:00 PM	0	1	37	11	0	2	23	1	0	8	1	4	0	2	1	1	92	339
4:15 PM	0	2	27	10	0	1	22	0	0	10	4	5	0	1	0	0	82	334
4:30 PM	0	1	23	4	0	2	21	1	0	10	4	8	0	0	1	0	75	342
4:45 PM	0	2	39	7	1	2	27	2	0	6	2	2	0	0	0	0	90	351
5:00 PM	0	3	29	8	0	4	21	1	0	15	1	4	0	0	1	0	87	344
5:15 PM	0	2	36	11	0	2	20	0	0	11	1	4	0	2	1	0	90	
5:30 PM	0	0	40	6	1	2	15	1	0	8	4	5	0	1	1	0	84	
5:45 PM	0	2	28	7	0	2	23	1	0	9	5	4	0	1	0	1	83	
Count Total	1	19	400	110	2	28	263	9	0	126	29	57	0	9	12	6	1,071	
Peak Hour	0	5	155	44	0	10	91	2	0	46	6	22	0	3	8	2	394	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	0	1	1	2	3:00 PM	0	2	5	0	7
3:15 PM	4	1	2	0	7	3:15 PM	0	0	0	0	0
3:30 PM	4	1	0	0	5	3:30 PM	0	1	2	1	4
3:45 PM	6	0	0	0	6	3:45 PM	1	1	3	0	5
4:00 PM	3	1	1	0	5	4:00 PM	0	0	0	0	0
4:15 PM	1	0	0	0	1	4:15 PM	1	0	2	0	3
4:30 PM	1	0	0	0	1	4:30 PM	0	2	6	0	8
4:45 PM	1	0	0	0	1	4:45 PM	0	1	1	0	2
5:00 PM	2	1	0	0	3	5:00 PM	0	1	2	0	3

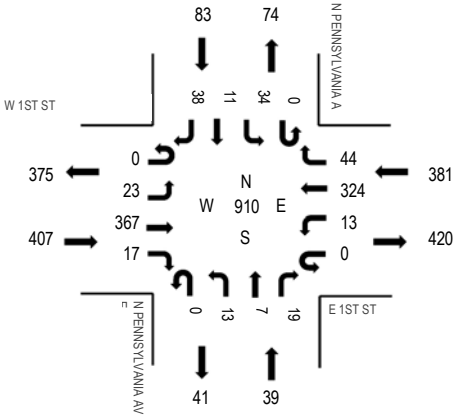
5:15 PM	1	0	1	0	2	5:15 PM	1	4	4	4	13
5:30 PM	1	0	0	0	1	5:30 PM	0	2	6	1	9
5:45 PM	1	0	0	0	1	5:45 PM	1	3	10	2	16
Count Total	25	4	5	1	35	Count Total	4	17	41	8	70
Peak Hour	17	3	3	0	23	Peak Hour	1	2	5	1	9

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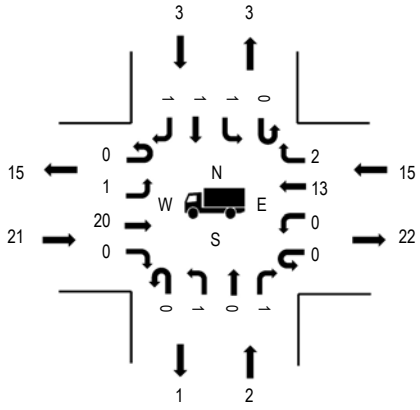
Location: 18 N PENNSYLVANIA AVE & E 1ST ST PM
Date: Thursday, August 15, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

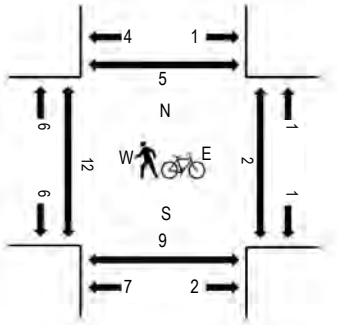
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.2%	0.86
WB	3.9%	0.92
NB	5.1%	0.57
SB	3.6%	0.94
All	4.5%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				E 1ST ST Westbound				N PENNSYLVANIA AVE Northbound				N PENNSYLVANIA AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	6	78	1	0	7	89	7	0	1	0	5	0	10	1	11	216	910
3:15 PM	0	5	90	6	0	6	82	9	0	4	1	5	0	7	4	9	228	879
3:30 PM	0	5	108	5	0	0	83	17	0	1	3	2	0	8	3	10	245	830
3:45 PM	0	7	91	5	0	0	70	11	0	7	3	7	0	9	3	8	221	808
4:00 PM	0	3	75	2	0	4	73	9	0	0	2	2	0	7	2	6	185	807
4:15 PM	0	7	81	5	0	2	60	11	0	1	1	1	0	3	1	6	179	833
4:30 PM	0	7	97	5	0	3	85	12	0	1	2	3	0	5	1	2	223	839
4:45 PM	0	7	106	3	0	2	74	8	0	1	1	4	0	6	2	6	220	793
5:00 PM	0	4	83	4	0	3	82	10	0	3	2	6	0	4	3	7	211	764
5:15 PM	0	4	75	0	0	2	76	10	0	0	3	4	0	6	1	4	185	
5:30 PM	0	8	80	3	0	0	50	7	0	4	2	5	0	7	2	9	177	
5:45 PM	0	8	81	0	0	1	71	11	0	1	2	1	0	6	4	5	191	
Count Total	0	71	1,045	39	0	30	895	122	0	24	22	45	0	78	27	83	2,481	
Peak Hour	0	23	367	17	0	13	324	44	0	13	7	19	0	34	11	38	910	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	3	0	7	0	10	3:00 PM	1	3	0	0	4
3:15 PM	8	2	4	1	15	3:15 PM	4	5	1	1	11
3:30 PM	6	0	3	1	10	3:30 PM	4	0	1	3	8
3:45 PM	4	0	1	1	6	3:45 PM	3	1	0	1	5
4:00 PM	5	0	3	2	10	4:00 PM	3	4	0	1	8
4:15 PM	2	0	2	2	6	4:15 PM	1	3	0	2	6
4:30 PM	6	0	1	0	7	4:30 PM	1	0	0	4	5
4:45 PM	2	0	0	0	2	4:45 PM	2	0	0	0	2
5:00 PM	2	0	5	0	7	5:00 PM	3	1	0	1	5

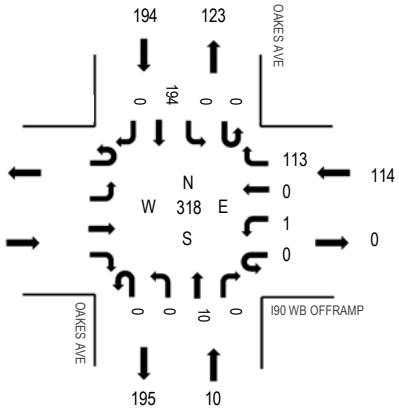
5:15 PM	1	0	0	0	1	5:15 PM	0	5	0	0	5
5:30 PM	3	2	1	0	6	5:30 PM	0	0	0	2	2
5:45 PM	2	0	3	0	5	5:45 PM	2	0	0	3	5
Count Total	44	4	30	7	85	Count Total	24	22	2	18	66
Peak Hour	21	2	15	3	41	Peak Hour	12	9	2	5	28

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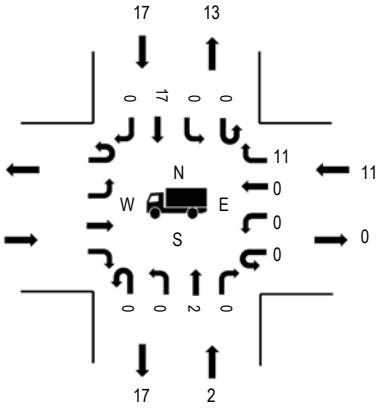
Location: 19 OAKES AVE & I90 WB OFFRAMP PM
Date: Thursday, August 15, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

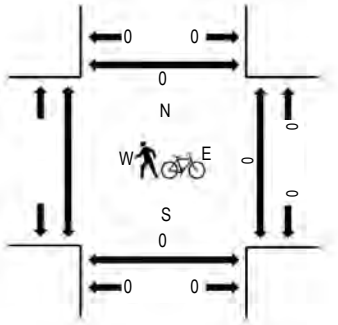
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB		
WB	9.6%	0.86
NB	20.0%	0.63
SB	8.8%	0.93
All	9.4%	0.98

Traffic Counts - All Vehicles

Interval Start Time	Eastbound				I90 WB OFFRAMP Westbound				OAKES AVE Northbound				OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM					0	1	0	27	0	0	6	0	0	0	41	0	75	312
3:15 PM					0	0	0	33	0	0	2	0	0	0	46	0	81	318
3:30 PM					0	1	0	26	0	0	1	0	0	0	48	0	76	300
3:45 PM					0	0	0	29	0	0	3	0	0	0	48	0	80	275
4:00 PM					0	0	0	25	0	0	4	0	0	0	52	0	81	265
4:15 PM					0	0	0	27	0	0	2	0	0	0	34	0	63	267
4:30 PM					0	0	0	21	0	0	2	0	0	0	28	0	51	282
4:45 PM					0	0	0	27	0	0	2	0	0	0	41	0	70	311
5:00 PM					0	0	0	28	0	0	4	0	0	0	51	0	83	300
5:15 PM					0	0	0	34	0	0	1	0	0	0	43	0	78	
5:30 PM					0	1	0	40	0	0	3	0	0	0	36	0	80	
5:45 PM					0	0	0	30	0	0	1	0	0	0	28	0	59	
Count Total					0	3	0	347	0	0	31	0	0	0	496	0	877	
Peak Hour					0	1	0	113	0	0	10	0	0	0	194	0	318	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM		2	2	6	10	3:00 PM		0	0	0	0
3:15 PM		0	6	6	12	3:15 PM		0	0	0	0
3:30 PM		0	3	4	7	3:30 PM		0	0	0	0
3:45 PM		2	1	5	8	3:45 PM		0	0	0	0
4:00 PM		0	1	2	3	4:00 PM		0	0	0	0
4:15 PM		0	3	2	5	4:15 PM		0	0	0	0
4:30 PM		0	0	2	2	4:30 PM		0	0	0	0
4:45 PM		0	2	2	4	4:45 PM		0	0	0	0
5:00 PM		0	1	3	4	5:00 PM		0	0	0	0

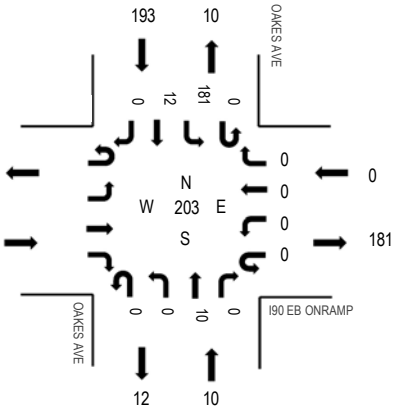
5:15 PM	0	0	0	0	5:15 PM	0	0	0	0
5:30 PM	0	3	1	4	5:30 PM	0	0	0	0
5:45 PM	0	4	2	6	5:45 PM	0	0	0	0
Count Total	4	26	35	65	Count Total	0	0	0	0
Peak Hour	2	11	17	30	Peak Hour	0	0	0	0

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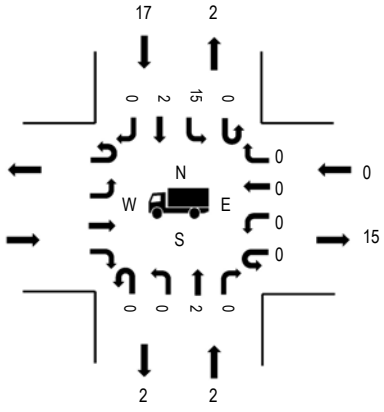
Location: 20 OAKES AVE & I90 EB ONRAMP PM
Date: Thursday, August 15, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

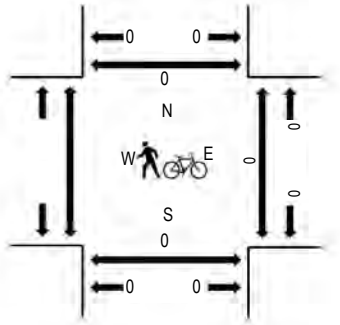
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB		
WB	0.0%	0.00
NB	20.0%	0.63
SB	8.8%	0.98
All	9.4%	0.96

Traffic Counts - All Vehicles

Interval Start Time	Eastbound				I90 EB ONRAMP Westbound				OAKES AVE Northbound				OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM					0	0	0	0	0	0	7	2	0	35	7	0	51	201
3:15 PM					0	0	0	0	0	0	2	0	0	44	2	0	48	203
3:30 PM					0	0	0	0	0	0	2	0	0	43	6	0	51	194
3:45 PM					0	0	0	0	0	0	2	0	0	47	2	0	51	175
4:00 PM					0	0	0	0	0	0	4	0	0	47	2	0	53	167
4:15 PM					0	0	0	0	0	0	2	1	0	32	4	0	39	168
4:30 PM					0	0	0	0	0	0	2	1	0	25	4	0	32	172
4:45 PM					0	0	0	0	0	0	2	0	0	39	2	0	43	180
5:00 PM					0	0	0	0	0	0	3	0	0	47	4	0	54	170
5:15 PM					0	0	0	0	0	0	1	0	0	42	0	0	43	
5:30 PM					0	0	0	0	0	0	3	0	0	33	4	0	40	
5:45 PM					0	0	0	0	0	0	2	2	0	29	0	0	33	
Count Total					0	0	0	0	0	0	32	6	0	463	37	0	538	
Peak Hour					0	0	0	0	0	0	10	0	0	181	12	0	203	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM		2	0	7	9	3:00 PM		0	0	0	0
3:15 PM		0	0	5	5	3:15 PM		0	0	0	0
3:30 PM		1	0	5	6	3:30 PM		0	0	0	0
3:45 PM		1	0	5	6	3:45 PM		0	0	0	0
4:00 PM		0	0	2	2	4:00 PM		0	0	0	0
4:15 PM		0	0	2	2	4:15 PM		0	0	0	0
4:30 PM		0	0	2	2	4:30 PM		0	0	0	0
4:45 PM		0	0	2	2	4:45 PM		0	0	0	0
5:00 PM		0	0	4	4	5:00 PM		0	0	0	0

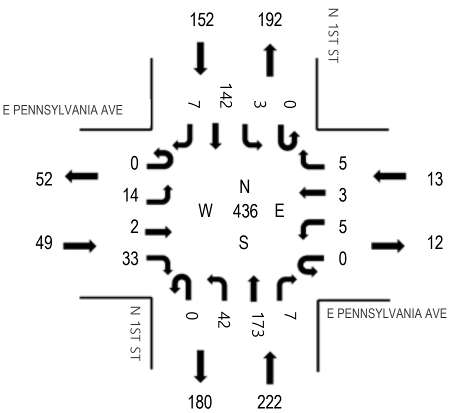
5:15 PM	0	0	0	0	5:15 PM	0	0	0	0
5:30 PM	0	0	1	1	5:30 PM	0	0	0	0
5:45 PM	0	0	2	2	5:45 PM	0	0	0	0
Count Total	4	0	37	41	Count Total	0	0	0	0
Peak Hour	2	0	17	19	Peak Hour	0	0	0	0

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Location: 1 N 1ST ST & E PENNSYLVANIA AVE PM
Date: Thursday, December 5, 2019
Peak Hour: 03:45 PM - 04:45 PM

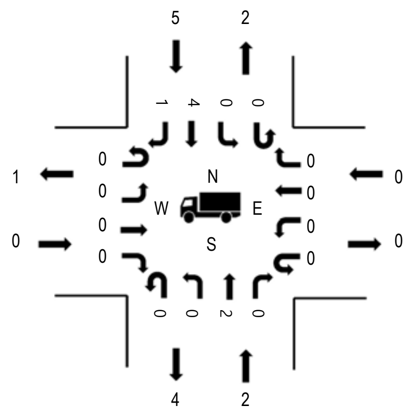
Peak Hour

Motorized Vehicles

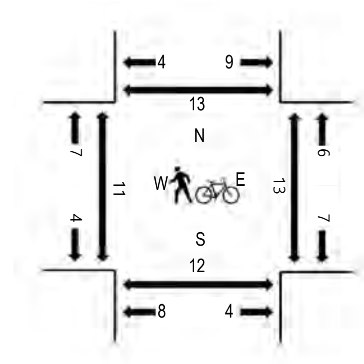


	HV%	PHF
EB	0.0%	0.61
WB	0.0%	0.46
NB	0.9%	0.87
SB	3.3%	0.69
All	1.6%	0.81

Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



Traffic Counts - Motorized Vehicles

Interval Start Time	E PENNSYLVANIA AVE Eastbound U-Turn	Left	Thru	Right	E PENNSYLVANIA AVE Westbound U-Turn	Left	Thru	Right	N 1ST ST Northbound U-Turn	Left	Thru	Right	N 1ST ST Southbound U-Turn	Left	Thru	Right	Total	Rolling Hour
3:00 PM	0	4	0	14	0	2	1	2	0	12	40	3	0	0	25	1	104	395
3:15 PM	0	2	1	1	0	0	1	0	0	13	38	4	0	1	30	1	92	425
3:30 PM	0	2	0	6	0	1	1	0	0	6	45	1	0	0	31	2	95	419
3:45 PM	0	5	0	6	0	3	1	3	0	11	41	0	0	3	30	1	104	436
4:00 PM	0	6	1	13	0	0	0	1	0	15	43	0	0	0	51	4	134	422
4:15 PM	0	1	0	9	0	1	1	1	0	5	39	4	0	0	24	1	86	402
4:30 PM	0	2	1	5	0	1	1	0	0	11	50	3	0	0	37	1	112	411
4:45 PM	0	2	1	9	0	0	0	1	1	13	40	2	0	0	17	4	90	388
5:00 PM	0	2	0	7	0	1	0	0	1	16	51	4	0	0	28	4	114	376
5:15 PM	0	4	0	8	0	1	1	0	0	18	41	1	0	0	19	2	95	
5:30 PM	0	1	1	6	0	0	0	1	0	14	34	2	0	1	27	2	89	
5:45 PM	0	4	1	3	0	1	0	0	0	6	38	1	0	1	19	4	78	
Count Total	0	35	6	87	0	11	7	9	2	140	500	25	0	6	338	27	1,193	
Peak Hour	0	14	2	33	0	5	3	5	0	42	173	7	0	3	142	7	436	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles EB	NB	WB	SB	Total
3:00 PM	0	1	0	1	2
3:15 PM	0	3	0	1	4
3:30 PM	0	0	0	0	0
3:45 PM	0	1	0	1	2
4:00 PM	0	1	0	4	5
4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0
5:00 PM	1	2	0	0	3

Interval Start Time	Pedestrians/Bicycles on Crosswalk EB	NB	WB	SB	Total
3:00 PM	2	2	2	6	12
3:15 PM	2	2	0	11	15
3:30 PM	9	4	2	7	22
3:45 PM	0	3	5	4	12
4:00 PM	3	4	5	6	18
4:15 PM	1	4	1	1	7
4:30 PM	7	1	2	2	12
4:45 PM	0	1	0	1	2
5:00 PM	0	5	1	2	8

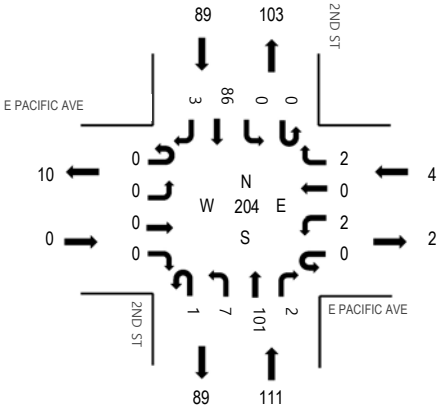
5:15 PM	0	0	0	2	2	5:15 PM	2	2	0	1	5
5:30 PM	1	1	0	0	2	5:30 PM	1	5	0	0	6
5:45 PM	0	0	0	0	0	5:45 PM	3	3	2	6	14
Count Total	2	9	0	9	20	Count Total	30	36	20	47	133
Peak Hour	0	2	0	5	7	Peak Hour	11	12	13	13	49

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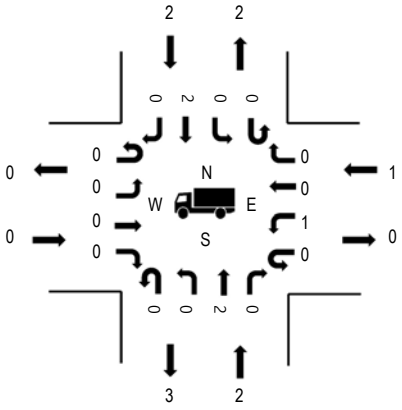
Location: 2 2ND ST & E PACIFIC AVE PM
Date: Thursday, December 5, 2019
Peak Hour: 03:45 PM - 04:45 PM

Peak Hour

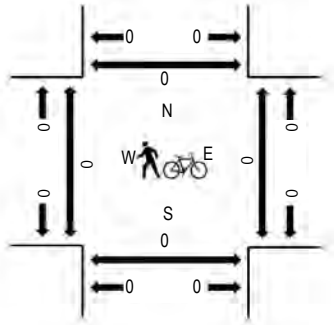
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	25.0%	0.50
NB	1.8%	0.69
SB	2.2%	0.79
All	2.5%	0.86

Traffic Counts - Motorized Vehicles

Interval Start Time	E PACIFIC AVE Eastbound				E PACIFIC AVE Westbound				2ND ST Northbound				2ND ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	0	1	0	1	0	0	0	1	23	0	0	0	17	0	43	182
3:15 PM	0	0	0	3	0	1	0	0	0	1	11	3	0	1	13	0	33	184
3:30 PM	0	0	0	1	0	1	0	1	0	0	27	1	0	0	18	0	49	194
3:45 PM	0	0	0	0	0	1	0	1	1	2	25	1	0	0	26	0	57	204
4:00 PM	0	0	0	0	0	0	0	0	0	0	17	0	0	0	26	2	45	188
4:15 PM	0	0	0	0	0	0	0	1	0	2	22	1	0	0	17	0	43	193
4:30 PM	0	0	0	0	0	1	0	0	0	3	37	0	0	0	17	1	59	193
4:45 PM	0	0	0	3	0	1	0	0	0	5	19	1	0	0	12	0	41	171
5:00 PM	0	0	0	1	0	0	0	0	0	1	30	0	0	0	18	0	50	171
5:15 PM	0	0	0	0	0	2	0	0	0	2	25	0	0	0	14	0	43	
5:30 PM	0	1	0	2	0	0	0	0	0	3	16	0	0	0	15	0	37	
5:45 PM	0	0	0	1	0	1	0	0	0	4	26	1	0	0	7	1	41	
Count Total	0	1	0	12	0	9	0	3	1	24	278	8	0	1	200	4	541	
Peak Hour	0	0	0	0	0	2	0	2	1	7	101	2	0	0	86	3	204	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	0	0	0	0	3:00 PM	0	0	1	0	1
3:15 PM	0	3	0	0	3	3:15 PM	2	6	0	0	8
3:30 PM	0	0	0	1	1	3:30 PM	0	0	0	0	0
3:45 PM	0	1	1	1	3	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	1	1	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	0	1	0	0	1	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0	4:45 PM	0	0	0	0	0
5:00 PM	0	1	0	1	2	5:00 PM	2	4	0	0	6

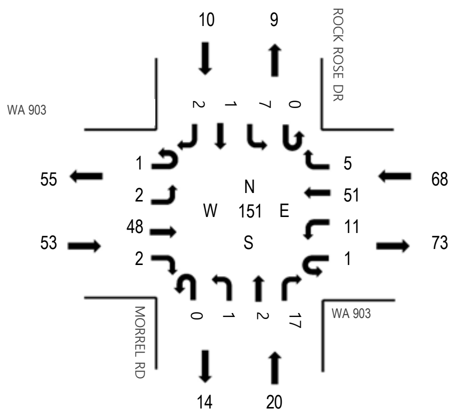
5:15 PM	0	0	1	1	2	5:15 PM	0	0	0	0	0
5:30 PM	0	0	0	0	0	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0	5:45 PM	0	0	0	0	0
Count Total	0	6	2	5	13	Count Total	4	10	1	0	15
Peak Hour	0	2	1	2	5	Peak Hour	0	0	0	0	0

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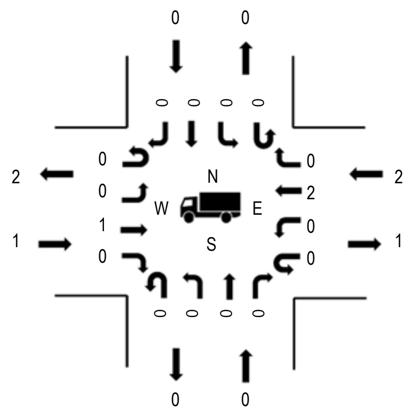
Location: 3 MORREL RD & WA 903 PM
Date: Thursday, December 5, 2019
Peak Hour: 03:45 PM - 04:45 PM

Peak Hour

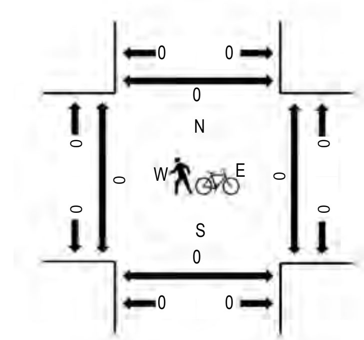
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.9%	0.70
WB	2.9%	0.74
NB	0.0%	0.71
SB	0.0%	0.50
All	2.0%	0.86

Traffic Counts - Motorized Vehicles

Interval Start Time	WA 903 Eastbound				WA 903 Westbound				MORREL RD Northbound				ROCK ROSE DR Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	2	8	0	0	0	16	3	0	1	1	3	0	1	0	1	36	140
3:15 PM	0	1	7	0	0	3	9	0	0	0	0	0	0	3	1	1	25	140
3:30 PM	0	1	8	0	0	2	12	2	0	1	0	4	0	4	0	1	35	148
3:45 PM	1	0	18	0	0	1	14	1	0	0	0	6	0	1	1	1	44	151
4:00 PM	0	0	12	0	0	2	9	1	0	1	0	6	0	4	0	1	36	143
4:15 PM	0	1	8	1	1	5	10	1	0	0	2	3	0	1	0	0	33	134
4:30 PM	0	1	10	1	0	3	18	2	0	0	0	2	0	1	0	0	38	139
4:45 PM	0	0	13	0	0	3	14	1	0	0	0	4	0	1	0	0	36	123
5:00 PM	0	0	7	0	0	2	8	6	0	0	0	2	0	2	0	0	27	114
5:15 PM	0	1	11	0	0	2	17	3	1	0	0	3	0	0	0	0	38	
5:30 PM	0	0	7	0	0	0	9	3	0	0	0	1	0	2	0	0	22	
5:45 PM	0	1	4	0	0	1	15	0	0	0	1	1	0	4	0	0	27	
Count Total	1	8	113	2	1	24	151	23	1	3	4	35	0	24	2	5	397	
Peak Hour	1	2	48	2	1	11	51	5	0	1	2	17	0	7	1	2	151	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	0	1	0	1	3:00 PM	0	0	0	0	0
3:15 PM	0	0	1	1	2	3:15 PM	0	0	0	0	0
3:30 PM	1	1	0	0	2	3:30 PM	0	0	0	0	0
3:45 PM	1	0	0	0	1	3:45 PM	0	0	0	0	0
4:00 PM	0	0	1	0	1	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	0	0	1	0	1	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0	4:45 PM	0	0	0	0	0
5:00 PM	1	0	0	0	1	5:00 PM	0	0	0	0	0

5:15 PM	1	0	0	0	1	5:15 PM	0	0	0	0	0
5:30 PM	0	0	0	0	0	5:30 PM	0	0	0	0	0
5:45 PM	0	0	0	0	0	5:45 PM	0	0	0	0	0
Count Total	4	1	4	1	10	Count Total	0	0	0	0	0
Peak Hour	1	0	2	0	3	Peak Hour	0	0	0	0	0

APPENDIX A (continued)

Raw Traffic Counts

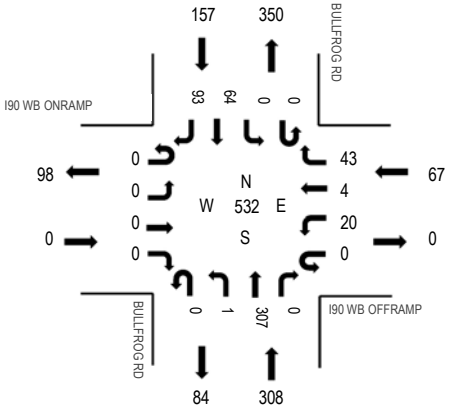
Friday Data Sheets

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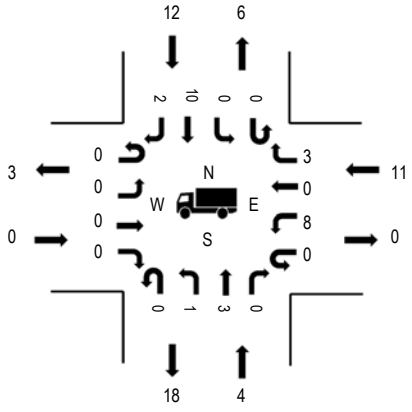
Location: 1 BULLFROG RD & I90 WB OFFRAMP PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

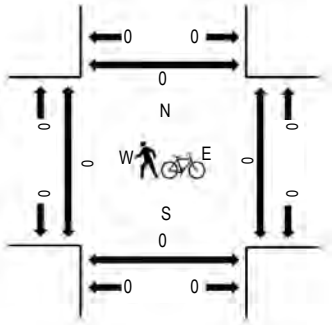
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	16.4%	0.93
NB	1.3%	0.84
SB	7.6%	0.87
All	5.1%	0.87

Traffic Counts - All Vehicles

Interval Start Time	I90 WB ONRAMP Eastbound				I90 WB OFFRAMP Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	0	0	0	0	6	0	18	0	2	52	0	0	0	5	25	108	440
2:15 PM	0	0	0	0	0	6	0	7	0	0	51	0	0	0	12	25	101	449
2:30 PM	0	0	0	0	0	4	0	17	0	3	57	0	0	0	16	29	126	480
2:45 PM	0	0	0	0	0	4	0	11	0	0	50	0	0	0	16	24	105	507
3:00 PM	0	0	0	0	0	5	0	13	0	1	70	0	0	0	10	18	117	532
3:15 PM	0	0	0	0	0	4	2	8	0	0	78	0	0	0	17	23	132	
3:30 PM	0	0	0	0	0	5	1	11	0	0	92	0	0	0	16	28	153	
3:45 PM	0	0	0	0	0	6	1	11	0	0	67	0	0	0	21	24	130	
Count Total	0	0	0	0	0	40	4	96	0	6	517	0	0	0	113	196	972	
Peak Hour	0	0	0	0	0	20	4	43	0	1	307	0	0	0	64	93	532	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

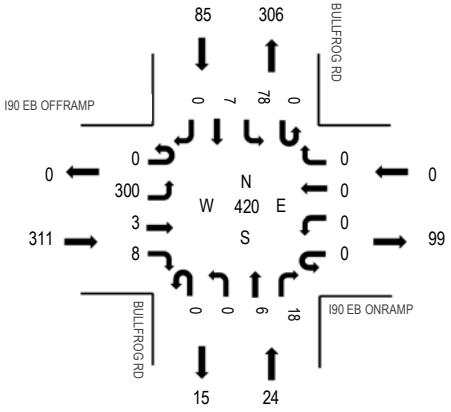
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	0	2	0	0	2	2:00 PM	0	0	0	0	0
2:15 PM	0	1	3	3	7	2:15 PM	0	0	0	0	0
2:30 PM	0	1	3	2	6	2:30 PM	0	0	0	0	0
2:45 PM	0	0	2	2	4	2:45 PM	0	0	0	0	0
3:00 PM	0	2	5	4	11	3:00 PM	0	0	0	0	0
3:15 PM	0	1	0	1	2	3:15 PM	0	0	0	0	0
3:30 PM	0	0	1	3	4	3:30 PM	0	0	0	0	0
3:45 PM	0	1	5	4	10	3:45 PM	0	0	0	0	0
Count Total	0	8	19	19	46	Count Total	0	0	0	0	0
Peak Hour	0	4	11	12	27	Peak Hour	0	0	0	0	0

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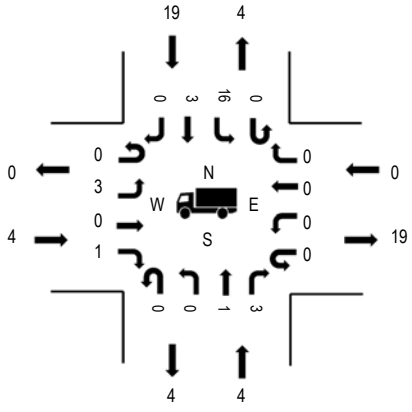
Location: 2 BULLFROG RD & I90 EB ONRAMP PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

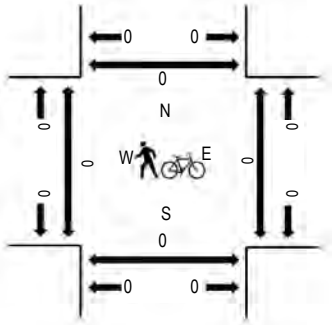
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.3%	0.81
WB	0.0%	0.00
NB	16.7%	0.43
SB	22.4%	0.79
All	6.4%	0.79

Traffic Counts - All Vehicles

Interval Start Time	I90 EB OFFRAMP Eastbound				I90 EB ONRAMP Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
2:00 PM	0	50	1	1	0	0	0	0	0	0	5	3	0	13	1	0	74	309
2:15 PM	0	50	1	1	0	0	0	0	0	0	1	1	0	13	4	0	71	327
2:30 PM	0	56	1	2	0	0	0	0	0	0	3	2	0	19	2	0	85	357
2:45 PM	0	52	1	0	0	0	0	0	0	0	0	6	0	20	0	0	79	405
3:00 PM	0	70	1	3	0	0	0	0	0	0	1	2	0	12	3	0	92	420
3:15 PM	0	74	2	1	0	0	0	0	0	0	2	2	0	18	2	0	101	
3:30 PM	0	92	0	4	0	0	0	0	0	0	1	13	0	22	1	0	133	
3:45 PM	0	64	0	0	0	0	0	0	0	0	2	1	0	26	1	0	94	
Count Total	0	508	7	12	0	0	0	0	0	0	15	30	0	143	14	0	729	
Peak Hour	0	300	3	8	0	0	0	0	0	0	6	18	0	78	7	0	420	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

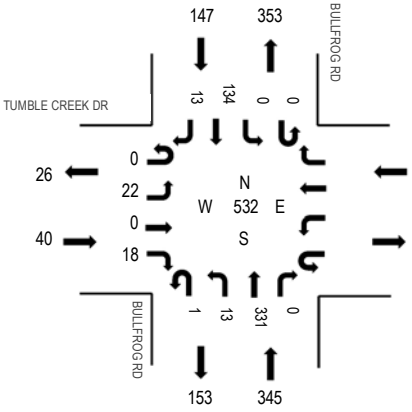
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	1	3	0	1	5	2:00 PM	0	0	0	0	0
2:15 PM	1	0	0	4	5	2:15 PM	0	0	0	0	0
2:30 PM	2	1	0	5	8	2:30 PM	0	0	0	0	0
2:45 PM	0	1	0	2	3	2:45 PM	0	0	0	0	0
3:00 PM	1	1	0	7	9	3:00 PM	0	0	0	0	0
3:15 PM	1	1	0	2	4	3:15 PM	0	0	0	0	0
3:30 PM	2	2	0	4	8	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	6	6	3:45 PM	0	0	0	0	0
Count Total	8	9	0	31	48	Count Total	0	0	0	0	0
Peak Hour	4	4	0	19	27	Peak Hour	0	0	0	0	0

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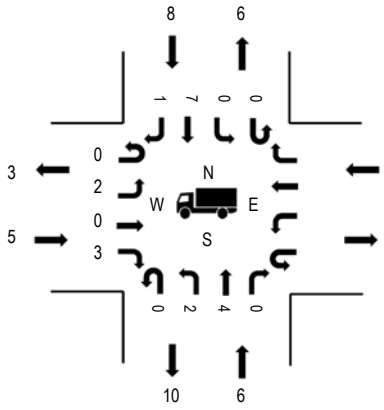
Location: 3 BULLFROG RD & TUMBLE CREEK DR PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

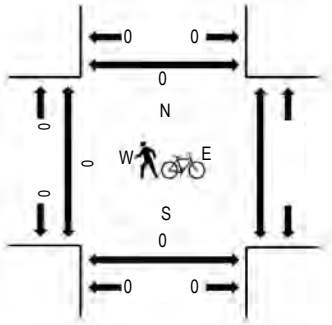
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	12.5%	0.67
WB		
NB	1.7%	0.83
SB	5.4%	0.80
All	3.6%	0.87

Traffic Counts - All Vehicles

Interval Start Time	TUMBLE CREEK DR Eastbound				Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	5	0	3					0	2	70	0	0	0	34	8	122	461
2:15 PM	0	11	0	1					0	3	51	0	0	0	35	4	105	457
2:30 PM	0	4	0	4					0	5	69	0	0	0	40	4	126	477
2:45 PM	0	7	0	2					0	1	56	0	1	0	35	6	108	504
3:00 PM	0	2	0	3					0	5	75	0	0	0	29	4	118	532
3:15 PM	0	5	0	4					0	4	78	0	0	0	32	2	125	
3:30 PM	0	7	0	8					1	1	102	0	0	0	33	1	153	
3:45 PM	0	8	0	3					0	3	76	0	0	0	40	6	136	
Count Total	0	49	0	28					1	24	577	0	1	0	278	35	993	
Peak Hour	0	22	0	18					1	13	331	0	0	0	134	13	532	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

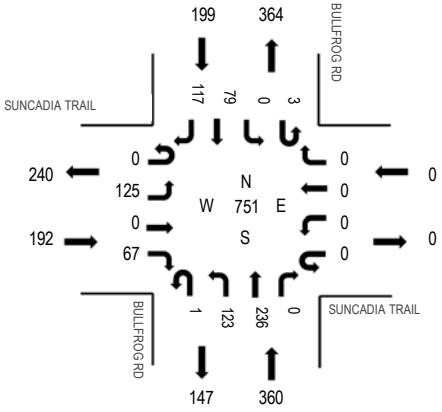
Interval Start Time	Heavy Vehicles EB	NB	WB	SB	Total	Interval Start Time	Pedestrians/Bicycles on Crosswalk EB	NB	WB	SB	Total
2:00 PM	2	0		4	6	2:00 PM	0	0		0	0
2:15 PM	0	1		5	6	2:15 PM	0	0		0	0
2:30 PM	2	1		1	4	2:30 PM	0	0		0	0
2:45 PM	2	2		3	7	2:45 PM	0	0		0	0
3:00 PM	1	1		4	6	3:00 PM	0	0		0	0
3:15 PM	1	2		0	3	3:15 PM	0	0		0	0
3:30 PM	1	0		3	4	3:30 PM	0	0		0	0
3:45 PM	2	3		1	6	3:45 PM	0	0		0	0
Count Total	11	10		21	42	Count Total	0	0		0	0
Peak Hour	5	6		8	19	Peak Hour	0	0		0	0

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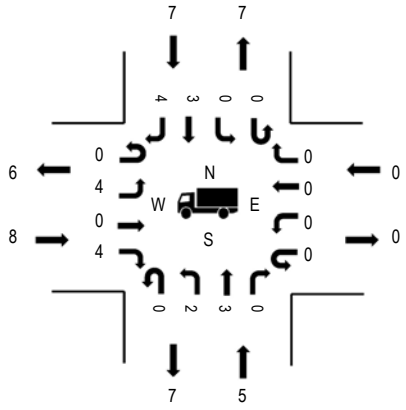
Location: 4 BULLFROG RD & SUNCADIA TRAIL PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

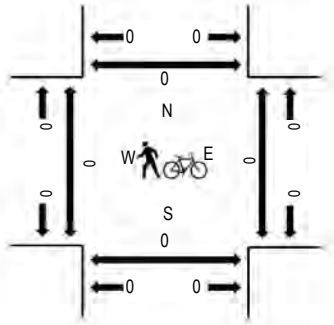
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.2%	0.87
WB	0.0%	0.00
NB	1.4%	0.87
SB	3.5%	0.94
All	2.7%	0.92

Traffic Counts - All Vehicles

Interval Start Time	SUNCADIA TRAIL Eastbound				SUNCADIA TRAIL Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	26	0	17	0	0	0	0	2	33	38	0	0	0	26	28	170	671
2:15 PM	0	27	0	18	0	0	0	0	1	32	36	0	0	0	20	35	169	669
2:30 PM	0	34	0	23	0	0	0	0	1	31	43	0	1	0	18	22	173	681
2:45 PM	0	24	0	24	0	0	0	0	0	21	38	0	1	0	19	32	159	713
3:00 PM	0	23	0	17	0	0	0	0	0	27	49	0	1	0	18	33	168	751
3:15 PM	0	32	0	14	0	0	0	0	0	24	63	0	0	0	20	28	181	
3:30 PM	0	37	0	18	0	0	0	0	1	41	62	0	2	0	15	29	205	
3:45 PM	0	33	0	18	0	0	0	0	0	31	62	0	0	0	26	27	197	
Count Total	0	236	0	149	0	0	0	0	5	240	391	0	5	0	162	234	1,422	
Peak Hour	0	125	0	67	0	0	0	0	1	123	236	0	3	0	79	117	751	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

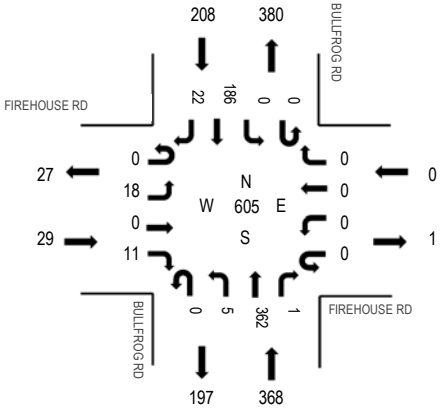
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	3	2	0	4	9	2:00 PM	0	0	0	0	0
2:15 PM	7	1	0	2	10	2:15 PM	0	0	0	0	0
2:30 PM	3	2	0	3	8	2:30 PM	0	0	0	0	0
2:45 PM	4	5	0	0	9	2:45 PM	0	0	0	0	0
3:00 PM	2	0	0	3	5	3:00 PM	0	0	0	0	0
3:15 PM	1	1	0	1	3	3:15 PM	0	0	0	0	0
3:30 PM	4	0	0	1	5	3:30 PM	0	0	0	0	0
3:45 PM	1	4	0	2	7	3:45 PM	0	0	0	0	0
Count Total	25	15	0	16	56	Count Total	0	0	0	0	0
Peak Hour	8	5	0	7	20	Peak Hour	0	0	0	0	0

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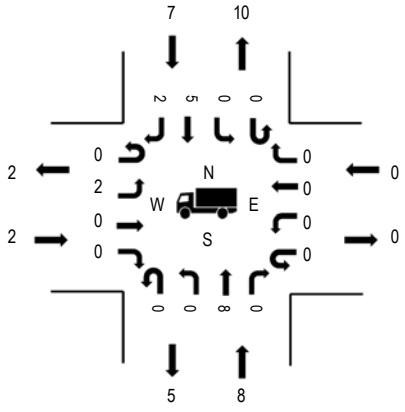
Location: 5 BULLFROG RD & FIREHOUSE RD PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

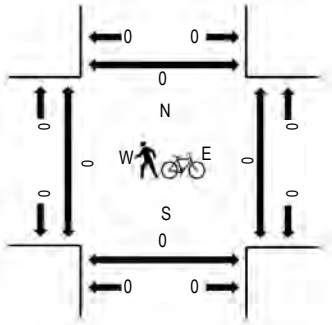
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	6.9%	0.81
WB	0.0%	0.00
NB	2.2%	0.90
SB	3.4%	0.91
All	2.8%	0.90

Traffic Counts - All Vehicles

Interval Start Time	FIREHOUSE RD Eastbound				FIREHOUSE RD Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	3	0	5	0	0	0	0	0	0	67	0	0	0	48	2	125	504
2:15 PM	0	3	0	4	0	0	0	0	0	2	61	0	0	0	50	4	124	515
2:30 PM	0	7	0	0	0	0	0	0	0	1	78	0	0	0	42	4	132	534
2:45 PM	0	4	0	3	0	0	0	0	0	3	55	0	0	0	52	6	123	570
3:00 PM	0	5	0	4	0	0	0	0	0	0	72	0	0	0	48	7	136	605
3:15 PM	0	3	0	2	0	0	0	0	0	3	92	0	0	0	43	0	143	
3:30 PM	0	6	0	3	0	0	0	0	0	2	100	0	0	0	46	11	168	
3:45 PM	0	4	0	2	0	0	0	0	0	0	98	1	0	0	49	4	158	
Count Total	0	35	0	23	0	0	0	0	0	11	623	1	0	0	378	38	1,109	
Peak Hour	0	18	0	11	0	0	0	0	0	5	362	1	0	0	186	22	605	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

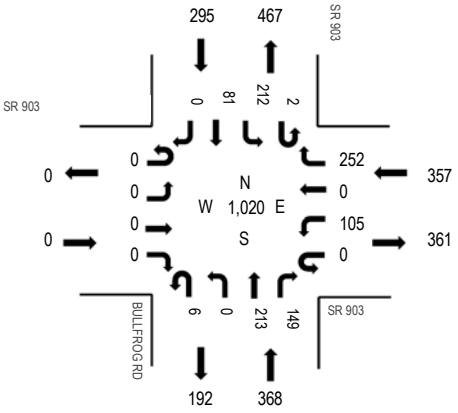
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	2	3	0	3	8	2:00 PM	0	0	0	0	0
2:15 PM	0	7	0	3	10	2:15 PM	1	0	0	0	1
2:30 PM	1	2	0	4	7	2:30 PM	0	0	0	0	0
2:45 PM	1	5	0	2	8	2:45 PM	0	0	0	0	0
3:00 PM	2	2	0	2	6	3:00 PM	0	0	0	0	0
3:15 PM	0	2	0	1	3	3:15 PM	0	0	0	0	0
3:30 PM	0	1	0	2	3	3:30 PM	0	0	0	0	0
3:45 PM	0	3	0	2	5	3:45 PM	0	0	0	0	0
Count Total	6	25	0	19	50	Count Total	1	0	0	0	1
Peak Hour	2	8	0	7	17	Peak Hour	0	0	0	0	0

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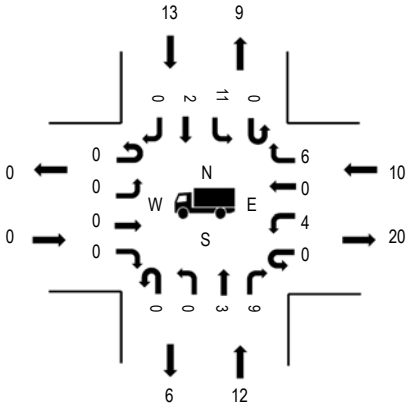
Location: 6 BULLFROG RD & SR 903 PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

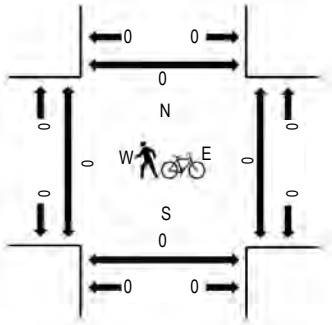
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	2.8%	0.85
NB	3.3%	0.88
SB	4.4%	0.84
All	3.4%	0.91

Traffic Counts - All Vehicles

Interval Start Time	SR 903 Eastbound				SR 903 Westbound				BULLFROG RD Northbound				SR 903 Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	0	0	0	0	21	0	49	1	0	34	28	0	55	22	0	210	898
2:15 PM	0	0	0	0	0	26	0	54	0	0	33	31	0	47	27	0	218	941
2:30 PM	0	0	0	0	0	20	0	63	2	0	43	35	0	66	15	0	244	947
2:45 PM	0	0	0	0	0	31	0	54	0	0	24	33	0	57	27	0	226	984
3:00 PM	0	0	0	0	0	33	0	53	0	0	47	32	1	67	20	0	253	1,020
3:15 PM	0	0	0	0	0	24	0	55	3	0	49	37	0	44	12	0	224	
3:30 PM	0	0	0	0	0	26	0	79	3	0	63	38	1	50	21	0	281	
3:45 PM	0	0	0	0	0	22	0	65	0	0	54	42	0	51	28	0	262	
Count Total	0	0	0	0	0	203	0	472	9	0	347	276	2	437	172	0	1,918	
Peak Hour	0	0	0	0	0	105	0	252	6	0	213	149	2	212	81	0	1,020	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

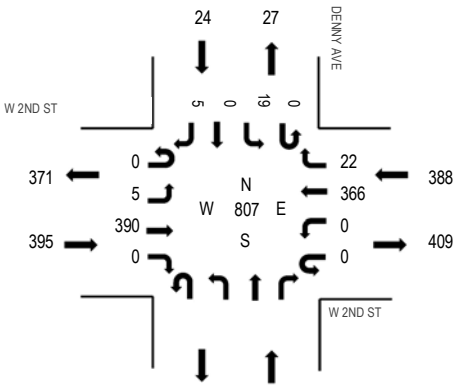
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	0	3	0	5	8	2:00 PM	0	0	0	0	0
2:15 PM	0	5	7	1	13	2:15 PM	0	0	0	0	0
2:30 PM	0	3	4	3	10	2:30 PM	0	1	0	0	1
2:45 PM	0	3	3	1	7	2:45 PM	0	1	0	0	1
3:00 PM	0	4	3	9	16	3:00 PM	0	0	0	0	0
3:15 PM	0	3	1	2	6	3:15 PM	0	0	0	0	0
3:30 PM	0	1	4	1	6	3:30 PM	0	0	0	0	0
3:45 PM	0	4	2	1	7	3:45 PM	0	0	0	0	0
Count Total	0	26	24	23	73	Count Total	0	2	0	0	2
Peak Hour	0	12	10	13	35	Peak Hour	0	0	0	0	0

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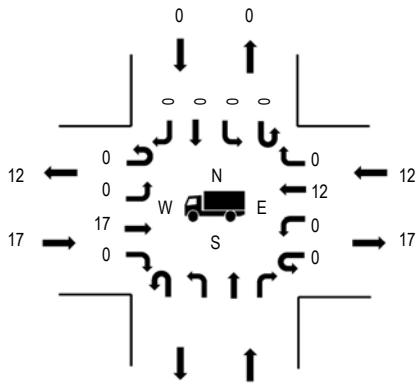
Location: 7 DENNY AVE & W 2ND ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:45 PM - 03:45 PM

Peak Hour

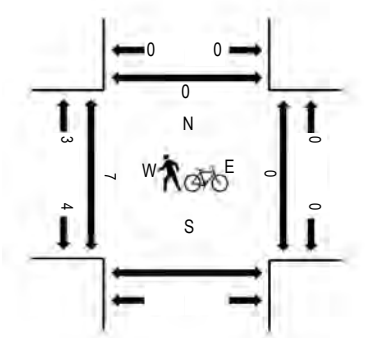
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.3%	0.95
WB	3.1%	0.87
NB		
SB	0.0%	0.75
All	3.6%	0.92

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				Northbound				DENNY AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	3	92	0	0	0	87	5					0	2	0	1	190	767
2:15 PM	0	1	83	0	0	0	86	6					0	2	0	1	179	780
2:30 PM	0	1	104	0	0	0	91	3					0	7	0	0	206	794
2:45 PM	0	1	96	0	0	0	85	2					0	5	0	3	192	807
3:00 PM	0	1	103	0	0	0	84	8					0	6	0	1	203	796
3:15 PM	0	2	89	0	0	0	92	6					0	4	0	0	193	
3:30 PM	0	1	102	0	0	0	105	6					0	4	0	1	219	
3:45 PM	0	1	85	0	0	0	84	4					0	6	0	1	181	
Count Total	0	11	754	0	0	0	714	40					0	36	0	8	1,563	
Peak Hour	0	5	390	0	0	0	366	22					0	19	0	5	807	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

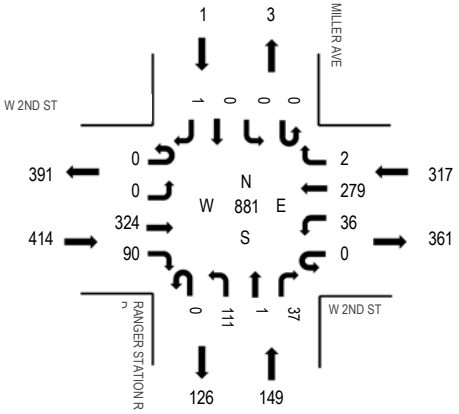
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	5		3	0	8	2:00 PM	0		0	0	0
2:15 PM	4		6	0	10	2:15 PM	0		0	0	0
2:30 PM	4		5	0	9	2:30 PM	0		0	0	0
2:45 PM	3		4	0	7	2:45 PM	0		0	0	0
3:00 PM	10		1	0	11	3:00 PM	1		0	0	1
3:15 PM	3		3	0	6	3:15 PM	6		0	0	6
3:30 PM	1		4	0	5	3:30 PM	0		0	0	0
3:45 PM	1		1	0	2	3:45 PM	0		0	0	0
Count Total	31		27	0	58	Count Total	7		0	0	7
Peak Hour	17		12	0	29	Peak Hour	7		0	0	7

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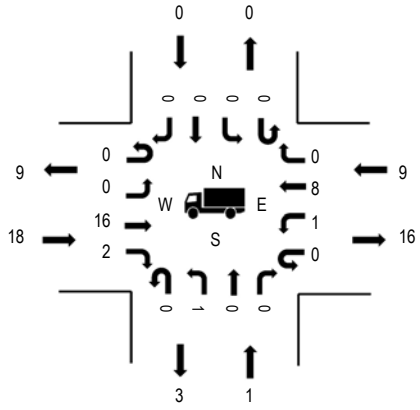
Location: 8 RANGER STATION RD & W 2ND ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:45 PM - 03:45 PM

Peak Hour

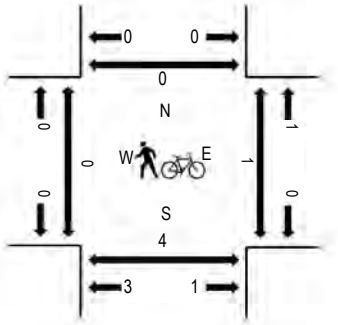
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.3%	0.94
WB	2.8%	0.98
NB	0.7%	0.89
SB	0.0%	0.25
All	3.2%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				RANGER STATION RD Northbound				MILLER AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	0	73	19	0	8	65	2	0	24	0	6	0	1	0	1	199	853
2:15 PM	0	0	67	18	0	11	82	0	0	17	1	12	0	0	0	0	208	865
2:30 PM	0	0	89	13	0	6	73	0	0	24	0	11	0	0	0	0	216	871
2:45 PM	0	0	79	31	0	17	62	1	0	29	0	11	0	0	0	0	230	881
3:00 PM	0	0	82	19	0	6	68	1	0	23	0	12	0	0	0	0	211	851
3:15 PM	0	0	75	25	0	8	73	0	0	24	1	7	0	0	0	1	214	
3:30 PM	0	0	88	15	0	5	76	0	0	35	0	7	0	0	0	0	226	
3:45 PM	0	0	82	14	0	8	71	1	0	15	0	8	0	1	0	0	200	
Count Total	0	0	635	154	0	69	570	5	0	191	2	74	0	2	0	2	1,704	
Peak Hour	0	0	324	90	0	36	279	2	0	111	1	37	0	0	0	1	881	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

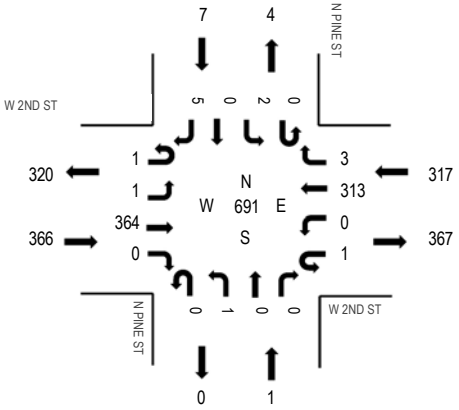
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	4	0	5	0	9	2:00 PM	0	0	0	0	0
2:15 PM	6	1	5	0	12	2:15 PM	0	2	0	0	2
2:30 PM	3	3	3	0	9	2:30 PM	0	2	0	0	2
2:45 PM	4	0	4	0	8	2:45 PM	0	2	0	0	2
3:00 PM	11	0	1	0	12	3:00 PM	0	2	1	0	3
3:15 PM	2	0	3	0	5	3:15 PM	0	0	0	0	0
3:30 PM	1	1	1	0	3	3:30 PM	0	0	0	0	0
3:45 PM	2	0	2	0	4	3:45 PM	0	0	0	0	0
Count Total	33	5	24	0	62	Count Total	0	8	1	0	9
Peak Hour	18	1	9	0	28	Peak Hour	0	4	1	0	5

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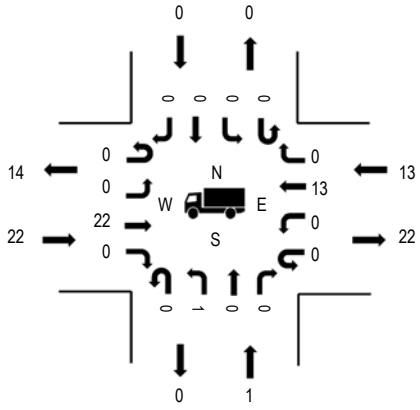
Location: 9 N PINE ST & W 2ND ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:15 PM - 03:15 PM

Peak Hour

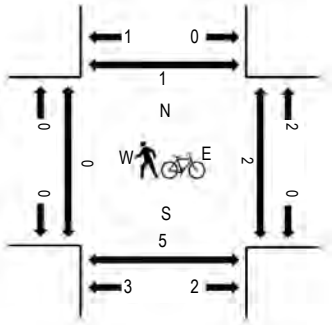
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	6.0%	0.92
WB	4.1%	0.90
NB	100.0%	0.25
SB	0.0%	0.58
All	5.2%	0.97

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N PINE ST Northbound				N PINE ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	1	0	78	0	0	0	79	0	0	0	0	0	0	0	0	0	158	679
2:15 PM	0	0	79	0	0	0	88	0	0	0	0	0	0	1	0	1	169	691
2:30 PM	0	1	99	0	0	0	78	1	0	0	0	0	0	0	0	0	179	685
2:45 PM	1	0	90	0	1	0	77	1	0	1	0	0	0	1	0	1	173	683
3:00 PM	0	0	96	0	0	0	70	1	0	0	0	0	0	0	0	3	170	686
3:15 PM	0	0	80	0	0	1	80	1	0	1	0	0	0	0	0	0	163	
3:30 PM	0	3	93	0	0	0	80	0	0	0	0	0	0	0	0	1	177	
3:45 PM	0	0	92	0	0	0	80	1	0	0	0	2	0	1	0	0	176	
Count Total	2	4	707	0	1	1	632	5	0	2	0	2	0	3	0	6	1,365	
Peak Hour	1	1	364	0	1	0	313	3	0	1	0	0	0	2	0	5	691	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

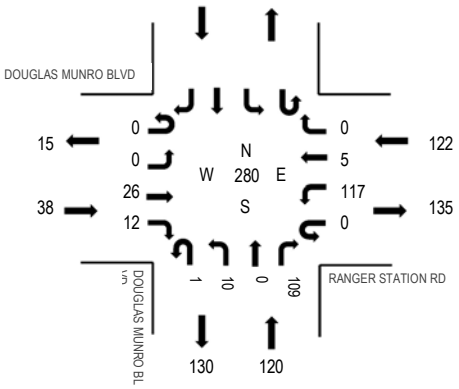
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	3	0	4	0	7	2:00 PM	0	1	0	0	1
2:15 PM	5	0	5	0	10	2:15 PM	0	1	1	1	3
2:30 PM	5	0	3	0	8	2:30 PM	0	1	0	0	1
2:45 PM	4	1	4	0	9	2:45 PM	0	1	1	0	2
3:00 PM	8	0	1	0	9	3:00 PM	0	2	0	0	2
3:15 PM	2	0	4	0	6	3:15 PM	0	1	0	0	1
3:30 PM	2	0	2	0	4	3:30 PM	0	0	0	0	0
3:45 PM	2	1	2	0	5	3:45 PM	0	0	0	0	0
Count Total	31	2	25	0	58	Count Total	0	7	2	1	10
Peak Hour	22	1	13	0	36	Peak Hour	0	5	2	1	8

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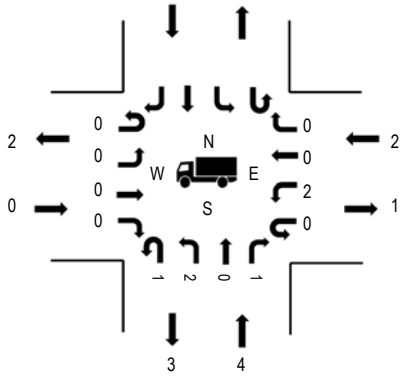
Location: 10 DOUGLAS MUNRO BLVD & RANGER STATION RD PM
Date: Friday, August 16, 2019
Peak Hour: 02:45 PM - 03:45 PM

Peak Hour

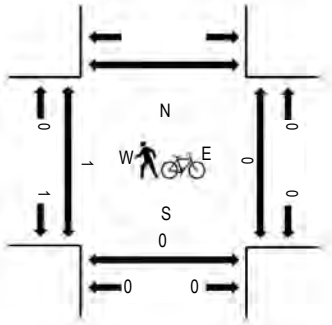
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.63
WB	1.6%	0.66
NB	3.3%	0.91
SB		
All	2.1%	0.80

Traffic Counts - All Vehicles

Interval Start Time	DOUGLAS MUNRO BLVD Eastbound				RANGER STATION RD Westbound				DOUGLAS MUNRO BLVD Northbound				Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	0	5	6	0	26	1	0	0	6	0	24					68	274
2:15 PM	0	0	5	6	0	23	3	0	0	3	0	25					65	271
2:30 PM	0	0	5	3	0	17	2	0	0	2	0	24					53	275
2:45 PM	0	0	8	1	0	44	2	0	0	3	0	30					88	280
3:00 PM	0	0	8	7	0	22	1	0	0	4	0	23					65	239
3:15 PM	0	0	5	0	0	34	1	0	0	2	0	27					69	
3:30 PM	0	0	5	4	0	17	1	0	1	1	0	29					58	
3:45 PM	0	0	4	1	0	20	0	0	0	3	0	19					47	
Count Total	0	0	45	28	0	203	11	0	1	24	0	201					513	
Peak Hour	0	0	26	12	0	117	5	0	1	10	0	109					280	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

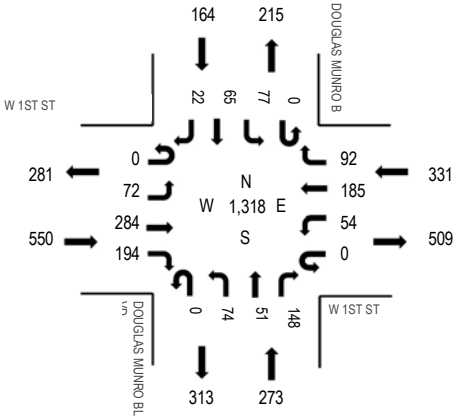
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	1	1	2		4	2:00 PM	1	0	0		1
2:15 PM	0	1	1		2	2:15 PM	0	0	0		0
2:30 PM	0	3	1		4	2:30 PM	0	0	0		0
2:45 PM	0	1	1		2	2:45 PM	1	0	0		1
3:00 PM	0	1	1		2	3:00 PM	0	0	0		0
3:15 PM	0	0	0		0	3:15 PM	0	0	0		0
3:30 PM	0	2	0		2	3:30 PM	0	0	0		0
3:45 PM	0	0	0		0	3:45 PM	0	0	0		0
Count Total	1	9	6		16	Count Total	2	0	0		2
Peak Hour	0	4	2		6	Peak Hour	1	0	0		1

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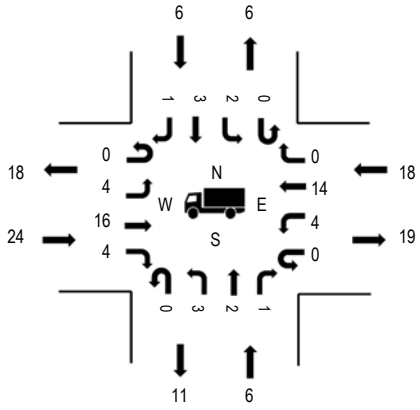
Location: 11 DOUGLAS MUNRO BLVD & W 1ST ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:00 PM - 03:00 PM

Peak Hour

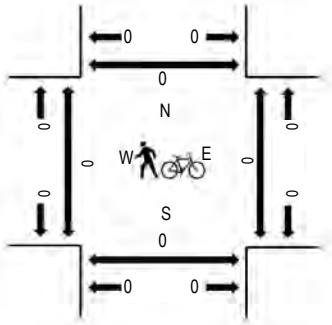
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.4%	0.86
WB	5.4%	0.91
NB	2.2%	0.92
SB	3.7%	0.75
All	4.1%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				DOUGLAS MUNRO BLVD Northbound				DOUGLAS MUNRO BLVD Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
2:00 PM	0	19	78	43	0	20	48	23	0	21	10	43	0	18	16	9	348	1,318
2:15 PM	0	12	55	37	0	9	57	23	0	15	12	40	0	21	12	4	297	1,270
2:30 PM	0	16	85	58	0	13	36	21	0	19	14	29	0	12	12	5	320	1,259
2:45 PM	0	25	66	56	0	12	44	25	0	19	15	36	0	26	25	4	353	1,224
3:00 PM	0	12	74	48	0	10	44	20	0	11	12	42	0	10	14	3	300	1,153
3:15 PM	0	8	60	44	0	11	32	30	0	11	11	32	0	16	28	3	286	
3:30 PM	0	15	57	29	0	14	45	29	0	26	11	27	0	17	11	4	285	
3:45 PM	0	16	55	57	0	16	41	12	0	10	11	33	0	13	15	3	282	
Count Total	0	123	530	372	0	105	347	183	0	132	96	282	0	133	133	35	2,471	
Peak Hour	0	72	284	194	0	54	185	92	0	74	51	148	0	77	65	22	1,318	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

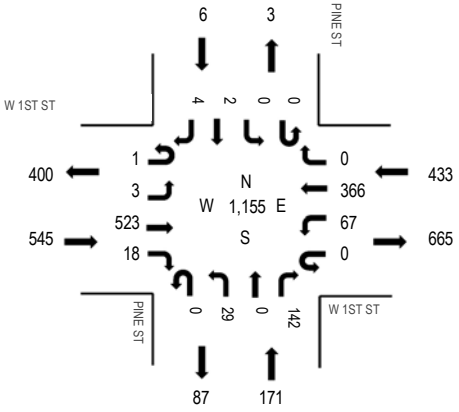
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	8	1	4	3	16	2:00 PM	0	0	0	0	0
2:15 PM	4	3	8	1	16	2:15 PM	0	0	0	0	0
2:30 PM	8	2	1	1	12	2:30 PM	0	0	0	0	0
2:45 PM	4	0	5	1	10	2:45 PM	0	0	0	0	0
3:00 PM	6	0	3	1	10	3:00 PM	0	2	0	0	2
3:15 PM	1	0	4	0	5	3:15 PM	0	7	0	0	7
3:30 PM	11	0	4	1	16	3:30 PM	0	2	1	0	3
3:45 PM	9	1	1	2	13	3:45 PM	1	7	0	0	8
Count Total	51	7	30	10	98	Count Total	1	18	1	0	20
Peak Hour	24	6	18	6	54	Peak Hour	0	0	0	0	0

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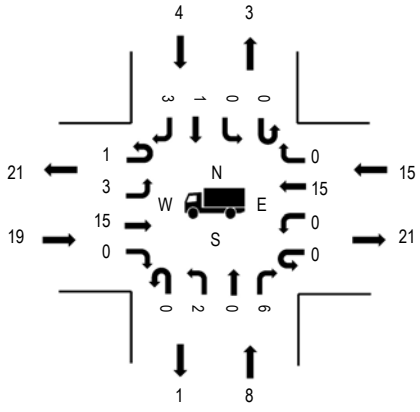
Location: 12 PINE ST & W 1ST ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:45 PM - 03:45 PM

Peak Hour

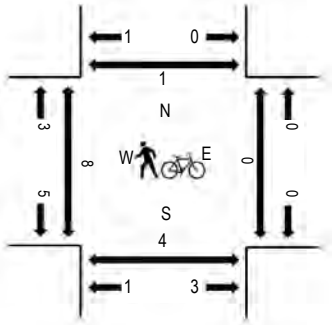
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	3.5%	0.94
WB	3.5%	0.90
NB	4.7%	0.95
SB	66.7%	0.50
All	4.0%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				PINE ST Northbound				PINE ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	0	145	3	0	23	88	0	0	6	0	28	0	0	0	0	293	1,145
2:15 PM	0	0	131	2	0	17	102	0	0	6	0	31	0	0	0	0	289	1,146
2:30 PM	0	0	138	5	0	15	81	0	0	2	0	34	0	0	0	0	275	1,130
2:45 PM	0	0	138	7	0	14	88	0	0	10	0	30	0	0	0	1	288	1,155
3:00 PM	0	1	139	3	0	15	89	0	0	8	0	37	0	0	0	2	294	1,144
3:15 PM	0	2	110	6	0	20	87	0	0	8	0	37	0	0	2	1	273	
3:30 PM	1	0	136	2	0	18	102	0	0	3	0	38	0	0	0	0	300	
3:45 PM	0	2	119	1	0	19	94	0	0	7	0	33	0	1	0	1	277	
Count Total	1	5	1,056	29	0	141	731	0	0	50	0	268	0	1	2	5	2,289	
Peak Hour	1	3	523	18	0	67	366	0	0	29	0	142	0	0	2	4	1,155	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

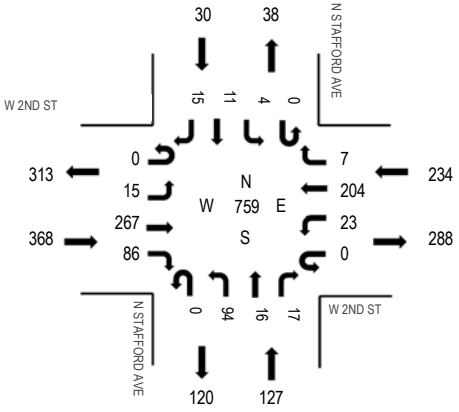
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	8	1	4	0	13	2:00 PM	3	0	0	2	5
2:15 PM	3	2	10	0	15	2:15 PM	3	0	0	1	4
2:30 PM	9	2	0	0	11	2:30 PM	2	2	0	1	5
2:45 PM	1	4	3	0	8	2:45 PM	1	3	0	1	5
3:00 PM	5	0	3	2	10	3:00 PM	2	0	0	0	2
3:15 PM	3	0	4	2	9	3:15 PM	2	0	0	0	2
3:30 PM	10	4	5	0	19	3:30 PM	3	1	0	0	4
3:45 PM	11	1	1	0	13	3:45 PM	0	1	0	0	1
Count Total	50	14	30	4	98	Count Total	16	7	0	5	28
Peak Hour	19	8	15	4	46	Peak Hour	8	4	0	1	13

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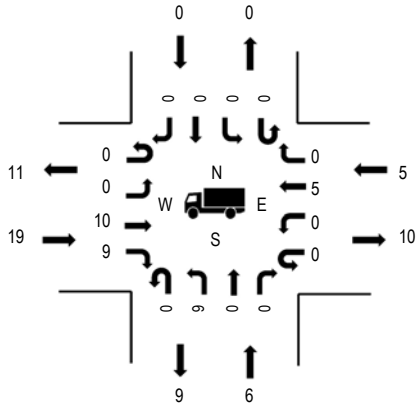
Location: 13 N STAFFORD AVE & W 2ND ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:30 PM - 03:30 PM

Peak Hour

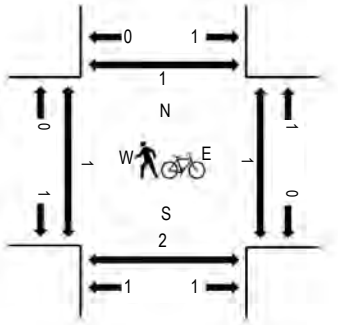
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.2%	0.93
WB	2.1%	0.86
NB	4.7%	0.86
SB	0.0%	0.68
All	4.0%	0.95

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N STAFFORD AVE Northbound				N STAFFORD AVE Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
2:00 PM	0	3	58	20	0	5	59	0	0	15	4	3	0	2	1	9	179	753
2:15 PM	0	4	56	19	0	5	51	0	0	26	2	5	0	3	3	4	178	754
2:30 PM	0	5	77	17	0	7	52	2	0	24	5	8	0	0	1	1	199	759
2:45 PM	0	2	70	21	0	7	58	3	0	17	5	4	0	2	5	3	197	746
3:00 PM	0	2	60	27	0	5	48	1	0	25	2	3	0	1	4	2	180	741
3:15 PM	0	6	60	21	0	4	46	1	0	28	4	2	0	1	1	9	183	
3:30 PM	0	4	58	23	0	7	52	3	0	21	3	7	0	4	0	4	186	
3:45 PM	0	5	53	29	0	4	60	2	0	21	4	5	0	2	3	4	192	
Count Total	0	31	492	177	0	44	426	12	0	177	29	37	0	15	18	36	1,494	
Peak Hour	0	15	267	86	0	23	204	7	0	94	16	17	0	4	11	15	759	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

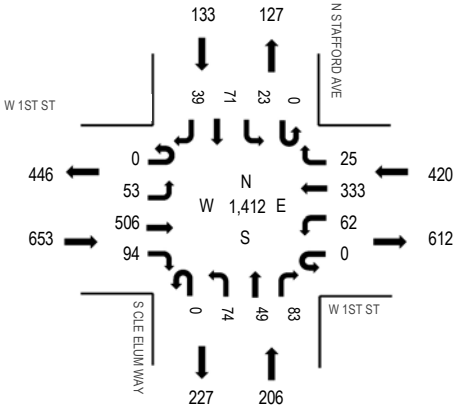
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	3	0	5	0	8	2:00 PM	0	0	0	0	0
2:15 PM	4	3	1	0	8	2:15 PM	0	3	1	2	6
2:30 PM	5	2	1	0	8	2:30 PM	0	0	0	0	0
2:45 PM	4	2	2	0	8	2:45 PM	0	1	0	1	2
3:00 PM	7	1	0	0	8	3:00 PM	1	1	1	0	3
3:15 PM	3	1	2	0	6	3:15 PM	0	0	0	0	0
3:30 PM	1	2	0	0	3	3:30 PM	1	1	0	1	3
3:45 PM	2	0	1	0	3	3:45 PM	5	0	0	0	5
Count Total	29	11	12	0	52	Count Total	7	6	2	4	19
Peak Hour	19	6	5	0	30	Peak Hour	1	2	1	1	5

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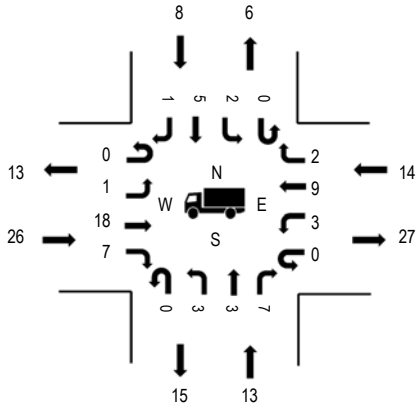
Location: 14 S CLE ELUM WAY & W 1ST ST PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

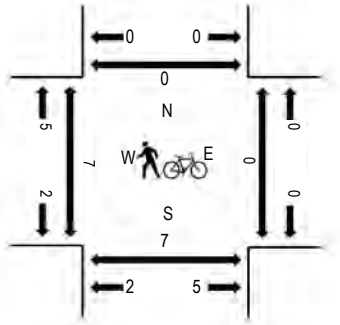
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.0%	0.93
WB	3.3%	0.94
NB	6.3%	0.86
SB	6.0%	0.85
All	4.3%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				S CLE ELUM WAY Northbound				N STAFFORD AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	9	125	29	0	13	81	5	0	19	11	25	0	1	17	9	344	1,389
2:15 PM	0	13	143	15	0	14	95	7	0	14	9	15	0	4	17	10	356	1,411
2:30 PM	0	18	131	17	0	21	75	11	0	13	12	17	0	4	13	8	340	1,378
2:45 PM	0	10	149	20	0	13	75	2	0	15	12	18	0	10	15	10	349	1,401
3:00 PM	0	15	143	17	0	13	81	3	0	18	12	25	0	5	19	15	366	1,412
3:15 PM	0	17	110	21	0	19	79	5	0	12	16	18	0	6	12	8	323	
3:30 PM	0	11	126	29	0	11	89	8	0	27	10	23	0	2	20	7	363	
3:45 PM	0	10	127	27	0	19	84	9	0	17	11	17	0	10	20	9	360	
Count Total	0	103	1,054	175	0	123	659	50	0	135	93	158	0	42	133	76	2,801	
Peak Hour	0	53	506	94	0	62	333	25	0	74	49	83	0	23	71	39	1,412	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

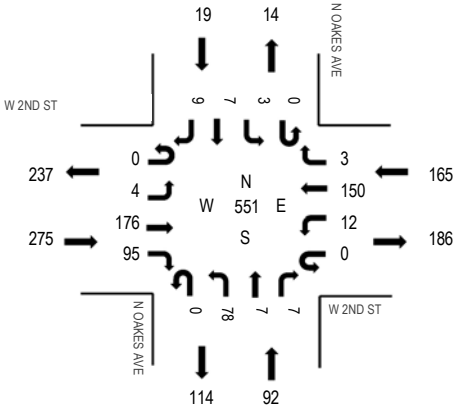
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	9	1	3	2	15	2:00 PM	0	1	0	0	1
2:15 PM	5	6	6	3	20	2:15 PM	0	0	0	0	0
2:30 PM	11	1	2	2	16	2:30 PM	0	0	0	0	0
2:45 PM	4	8	2	2	16	2:45 PM	0	0	0	0	0
3:00 PM	4	3	2	4	13	3:00 PM	0	4	0	0	4
3:15 PM	0	3	5	1	9	3:15 PM	0	0	0	0	0
3:30 PM	9	7	3	0	19	3:30 PM	2	2	0	0	4
3:45 PM	13	0	4	3	20	3:45 PM	5	1	0	0	6
Count Total	55	29	27	17	128	Count Total	7	8	0	0	15
Peak Hour	26	13	14	8	61	Peak Hour	7	7	0	0	14

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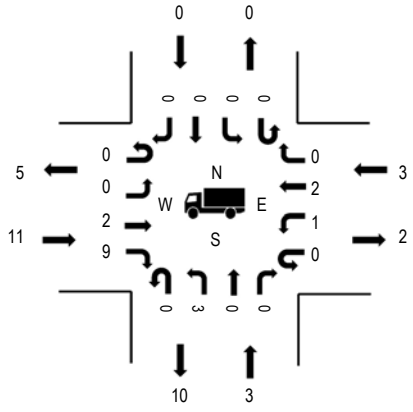
Location: 15 N OAKES AVE & W 2ND ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:15 PM - 03:15 PM

Peak Hour

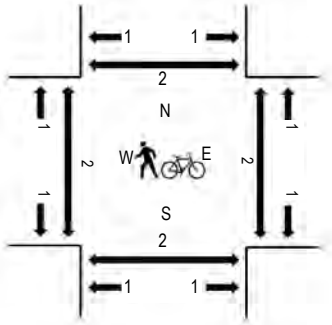
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.0%	0.86
WB	1.8%	0.84
NB	3.3%	0.64
SB	0.0%	0.48
All	3.1%	0.91

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N OAKES AVE Northbound				N OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	2	42	16	0	2	37	0	0	21	0	4	0	0	0	2	126	541
2:15 PM	0	0	36	21	0	0	33	2	0	18	3	3	0	1	1	2	120	551
2:30 PM	0	2	45	33	0	4	44	0	0	16	0	3	0	1	1	2	151	541
2:45 PM	0	2	51	21	0	0	33	0	0	31	4	1	0	0	0	1	144	537
3:00 PM	0	0	44	20	0	8	40	1	0	13	0	0	0	1	5	4	136	530
3:15 PM	0	4	36	18	0	0	29	0	0	17	0	0	0	0	5	1	110	
3:30 PM	0	3	42	25	0	1	41	1	0	17	5	7	0	1	1	3	147	
3:45 PM	0	5	44	10	0	1	48	1	0	21	3	1	0	0	2	1	137	
Count Total	0	18	340	164	0	16	305	5	0	154	15	19	0	4	15	16	1,071	
Peak Hour	0	4	176	95	0	12	150	3	0	78	7	7	0	3	7	9	551	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

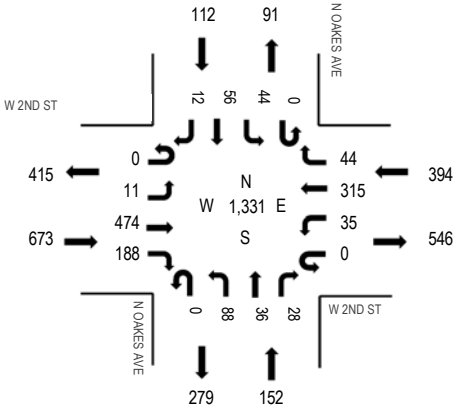
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	3	3	2	0	8	2:00 PM	0	0	0	0	0
2:15 PM	3	0	1	0	4	2:15 PM	0	0	0	1	1
2:30 PM	3	0	2	0	5	2:30 PM	0	0	0	1	1
2:45 PM	2	2	0	0	4	2:45 PM	2	2	2	0	6
3:00 PM	3	1	0	0	4	3:00 PM	0	0	0	0	0
3:15 PM	2	2	0	0	4	3:15 PM	0	0	0	0	0
3:30 PM	2	1	1	0	4	3:30 PM	0	2	0	0	2
3:45 PM	0	0	1	0	1	3:45 PM	0	0	0	0	0
Count Total	18	9	7	0	34	Count Total	2	4	2	2	10
Peak Hour	11	3	3	0	17	Peak Hour	2	2	2	2	8

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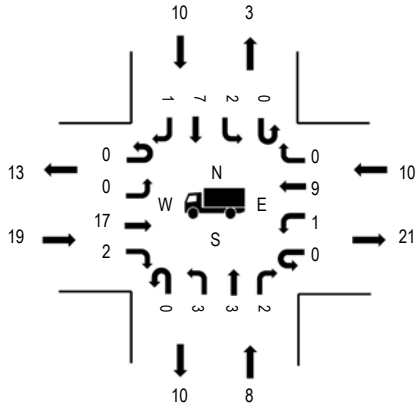
Location: 16 N OAKES AVE & W 2ND ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:15 PM - 03:15 PM

Peak Hour

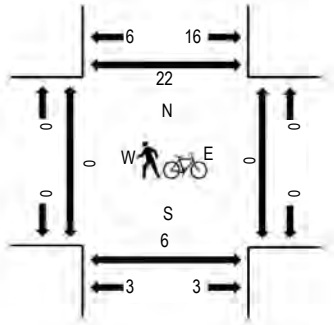
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	2.8%	0.91
WB	2.5%	0.93
NB	5.3%	0.88
SB	8.9%	0.88
All	3.5%	0.97

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N OAKES AVE Northbound				N OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	3	106	44	0	8	88	9	0	23	15	7	0	8	8	2	321	1,308
2:15 PM	0	6	124	38	0	11	79	13	0	26	5	4	0	9	12	2	329	1,331
2:30 PM	0	2	114	43	0	8	86	12	0	19	5	10	0	10	18	4	331	1,303
2:45 PM	0	2	115	44	0	10	75	14	0	20	18	2	0	16	8	3	327	1,305
3:00 PM	0	1	121	63	0	6	75	5	0	23	8	12	0	9	18	3	344	1,290
3:15 PM	0	2	107	30	0	8	87	9	0	19	9	6	0	5	13	6	301	
3:30 PM	0	5	112	35	0	13	91	15	0	15	5	8	0	13	17	4	333	
3:45 PM	0	5	114	30	0	10	95	7	0	16	14	8	0	6	7	0	312	
Count Total	0	26	913	327	0	74	676	84	0	161	79	57	0	76	101	24	2,598	
Peak Hour	0	11	474	188	0	35	315	44	0	88	36	28	0	44	56	12	1,331	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

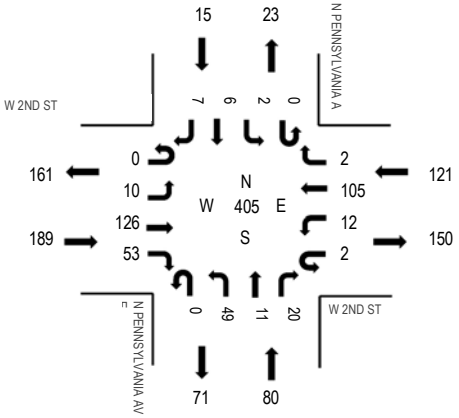
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	6	5	2	2	15	2:00 PM	0	2	0	17	19
2:15 PM	4	1	5	3	13	2:15 PM	0	0	0	9	9
2:30 PM	5	1	2	3	11	2:30 PM	0	0	0	2	2
2:45 PM	7	4	3	2	16	2:45 PM	0	1	0	4	5
3:00 PM	3	2	0	2	7	3:00 PM	0	5	0	7	12
3:15 PM	3	4	3	2	12	3:15 PM	0	1	0	6	7
3:30 PM	13	1	4	2	20	3:30 PM	0	2	0	11	13
3:45 PM	11	1	3	0	15	3:45 PM	2	9	1	2	14
Count Total	52	19	22	16	109	Count Total	2	20	1	58	81
Peak Hour	19	8	10	10	47	Peak Hour	0	6	0	22	28

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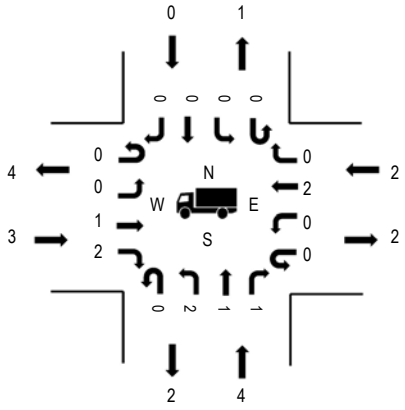
Location: 17 N PENNSYLVANIA AVE & W 2ND ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:15 PM - 03:15 PM

Peak Hour

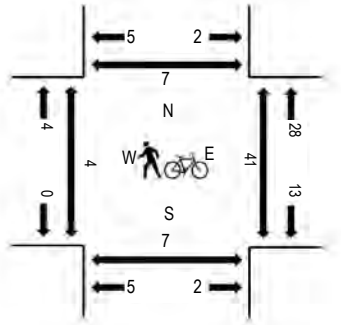
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.6%	0.89
WB	1.7%	0.80
NB	5.0%	0.91
SB	0.0%	0.75
All	2.2%	0.90

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N PENNSYLVANIA AVE Northbound				N PENNSYLVANIA AVE Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
2:00 PM	0	4	31	9	0	1	23	3	0	14	1	6	0	2	0	1	95	399
2:15 PM	0	3	29	12	1	4	19	0	0	11	2	7	0	0	2	3	93	405
2:30 PM	0	5	29	14	1	3	33	1	0	14	2	6	0	1	3	1	113	395
2:45 PM	0	1	38	14	0	3	24	0	0	8	6	2	0	0	1	1	98	381
3:00 PM	0	1	30	13	0	2	29	1	0	16	1	5	0	1	0	2	101	402
3:15 PM	0	0	26	12	0	7	17	1	1	7	2	4	0	1	3	2	83	
3:30 PM	0	1	36	14	0	2	32	0	0	9	0	4	0	0	1	0	99	
3:45 PM	0	1	33	15	0	6	34	0	0	17	1	7	0	2	3	0	119	
Count Total	0	16	252	103	2	28	211	6	1	96	15	41	0	7	13	10	801	
Peak Hour	0	10	126	53	2	12	105	2	0	49	11	20	0	2	6	7	405	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

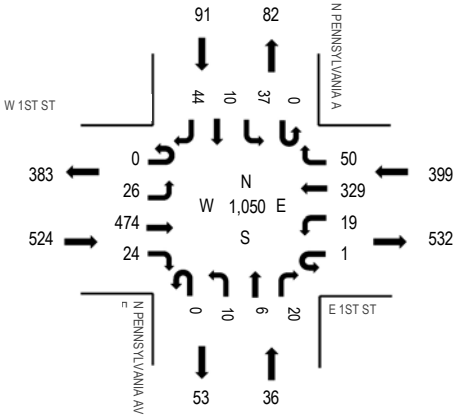
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	2	0	2	1	5	2:00 PM	0	1	11	2	14
2:15 PM	1	0	1	0	2	2:15 PM	1	2	4	1	8
2:30 PM	1	3	0	0	4	2:30 PM	0	2	20	1	23
2:45 PM	0	1	0	0	1	2:45 PM	0	1	7	0	8
3:00 PM	1	0	1	0	2	3:00 PM	3	2	10	5	20
3:15 PM	0	0	0	0	0	3:15 PM	2	5	4	1	12
3:30 PM	0	0	0	0	0	3:30 PM	0	0	3	0	3
3:45 PM	0	1	2	0	3	3:45 PM	0	2	3	0	5
Count Total	5	5	6	1	17	Count Total	6	15	62	10	93
Peak Hour	3	4	2	0	9	Peak Hour	4	7	41	7	59

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Location: 18 N PENNSYLVANIA AVE & E 1ST ST PM
Date: Friday, August 16, 2019
Peak Hour: 02:15 PM - 03:15 PM

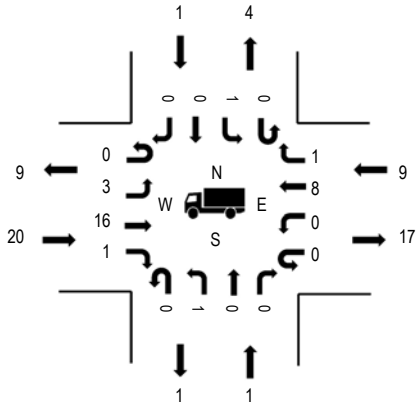
Peak Hour

All Vehicles

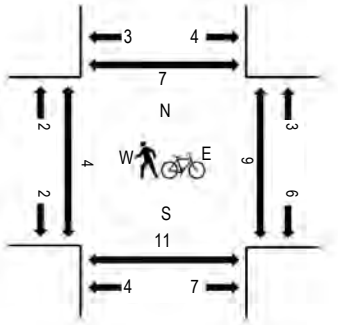


	HV%	PHF
EB	3.8%	0.95
WB	2.3%	0.84
NB	2.8%	0.60
SB	1.1%	0.88
All	3.0%	0.99

Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				E 1ST ST Westbound				N PENNSYLVANIA AVE Northbound				N PENNSYLVANIA AVE Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
2:00 PM	0	6	106	2	0	8	89	8	0	4	5	8	0	6	3	8	253	1,043
2:15 PM	0	10	121	6	0	2	84	14	0	1	1	3	0	9	3	12	266	1,050
2:30 PM	0	8	103	5	1	7	96	15	0	0	0	6	0	8	3	11	263	1,033
2:45 PM	0	2	126	5	0	6	77	9	0	2	2	6	0	9	4	13	261	1,037
3:00 PM	0	6	124	8	0	4	72	12	0	7	3	5	0	11	0	8	260	1,047
3:15 PM	0	3	105	9	0	3	86	12	0	0	1	3	0	11	2	14	249	
3:30 PM	0	5	104	7	0	3	100	11	0	6	2	3	0	10	2	14	267	
3:45 PM	0	6	110	3	0	3	96	17	0	2	1	9	0	10	5	9	271	
Count Total	0	46	899	45	1	36	700	98	0	22	15	43	0	74	22	89	2,090	
Peak Hour	0	26	474	24	1	19	329	50	0	10	6	20	0	37	10	44	1,050	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

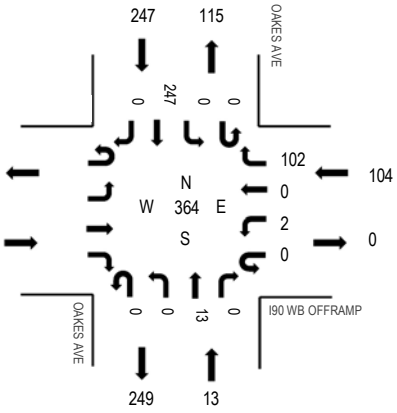
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	6	0	3	0	9	2:00 PM	0	1	2	5	8
2:15 PM	4	1	3	0	8	2:15 PM	3	2	0	5	10
2:30 PM	5	0	3	0	8	2:30 PM	1	0	1	0	2
2:45 PM	8	0	3	0	11	2:45 PM	0	2	6	0	8
3:00 PM	3	0	0	1	4	3:00 PM	0	7	2	2	11
3:15 PM	3	0	3	1	7	3:15 PM	1	2	0	3	6
3:30 PM	7	1	2	0	10	3:30 PM	3	4	1	14	22
3:45 PM	9	1	4	1	15	3:45 PM	2	5	5	2	14
Count Total	45	3	21	3	72	Count Total	10	23	17	31	81
Peak Hour	20	1	9	1	31	Peak Hour	4	11	9	7	31

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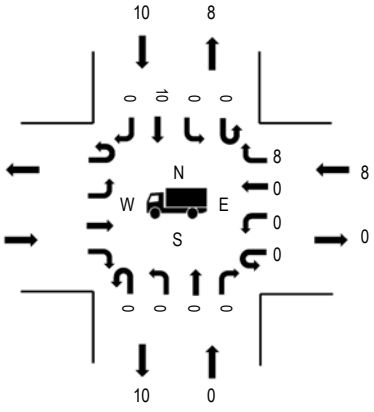
Location: 19 OAKES AVE & I90 WB OFFRAMP PM
Date: Friday, August 16, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

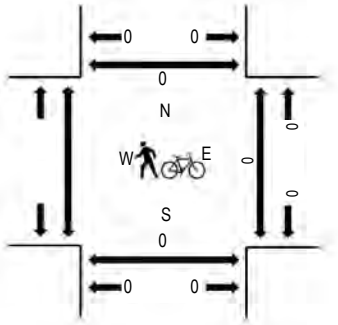
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB		
WB	7.7%	0.79
NB	0.0%	0.46
SB	4.0%	0.76
All	4.9%	0.78

Traffic Counts - All Vehicles

Interval Start Time	Eastbound				I90 WB OFFRAMP Westbound				OAKES AVE Northbound				OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM					0	0	0	26	0	0	7	0	0	0	54	0	87	324
2:15 PM					0	0	0	18	0	0	4	0	0	0	55	0	77	353
2:30 PM					0	0	0	22	0	0	5	0	0	0	52	0	79	357
2:45 PM					0	0	0	26	0	0	0	0	0	0	55	0	81	362
3:00 PM					0	0	0	28	0	0	7	0	0	0	81	0	116	364
3:15 PM					0	1	0	23	0	0	1	0	0	0	56	0	81	
3:30 PM					0	0	0	19	0	0	0	0	0	0	65	0	84	
3:45 PM					0	1	0	32	0	0	5	0	0	0	45	0	83	
Count Total					0	2	0	194	0	0	29	0	0	0	463	0	688	
Peak Hour					0	2	0	102	0	0	13	0	0	0	247	0	364	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

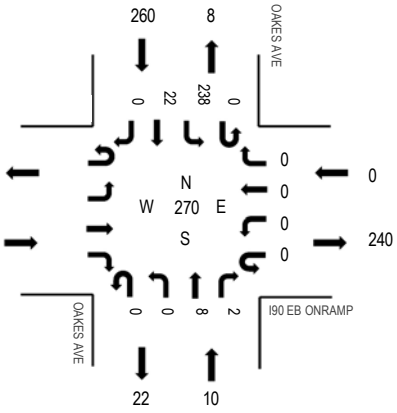
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM		0	1	3	4	2:00 PM		0	0	0	0
2:15 PM		0	1	2	3	2:15 PM		0	0	0	0
2:30 PM		0	0	3	3	2:30 PM		0	0	0	0
2:45 PM		0	3	3	6	2:45 PM		0	0	0	0
3:00 PM		0	6	2	8	3:00 PM		0	0	0	0
3:15 PM		0	1	2	3	3:15 PM		0	0	0	0
3:30 PM		0	0	4	4	3:30 PM		0	0	0	0
3:45 PM		0	1	2	3	3:45 PM		0	0	0	0
Count Total		0	13	21	34	Count Total		0	0	0	0
Peak Hour		0	8	10	18	Peak Hour		0	0	0	0

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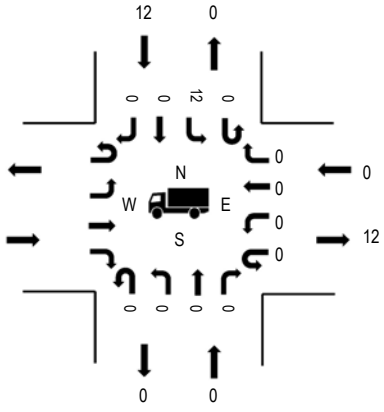
Location: 20 OAKES AVE & I90 EB ONRAMP PM
Date: Friday, August 16, 2019
Peak Hour: 02:45 PM - 03:45 PM

Peak Hour

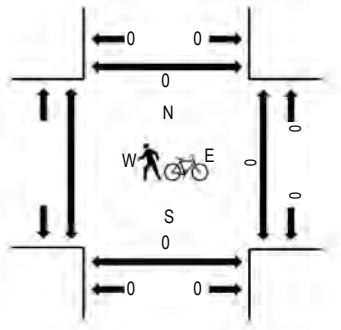
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB		
WB	0.0%	0.00
NB	0.0%	0.31
SB	4.6%	0.80
All	4.4%	0.76

Traffic Counts - All Vehicles

Interval Start Time	Eastbound				I90 EB ONRAMP Westbound				OAKES AVE Northbound				OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM					0	0	0	0	0	0	7	4	0	51	4	0	66	238
2:15 PM					0	0	0	0	0	0	4	0	0	51	4	0	59	261
2:30 PM					0	0	0	0	0	0	5	0	0	47	4	0	56	260
2:45 PM					0	0	0	0	0	0	0	0	0	56	1	0	57	270
3:00 PM					0	0	0	0	0	0	7	1	0	76	5	0	89	262
3:15 PM					0	0	0	0	0	0	1	0	0	49	8	0	58	
3:30 PM					0	0	0	0	0	0	0	1	0	57	8	0	66	
3:45 PM					0	0	0	0	0	0	5	0	0	37	7	0	49	
Count Total					0	0	0	0	0	0	29	6	0	424	41	0	500	
Peak Hour					0	0	0	0	0	0	8	2	0	238	22	0	270	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

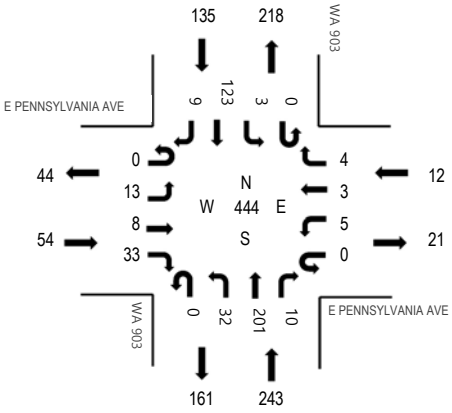
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM		0	0	3	3	2:00 PM		0	0	0	0
2:15 PM		0	0	2	2	2:15 PM		0	0	0	0
2:30 PM		0	0	2	2	2:30 PM		0	0	0	0
2:45 PM		0	0	4	4	2:45 PM		0	0	0	0
3:00 PM		0	0	2	2	3:00 PM		0	0	0	0
3:15 PM		0	0	2	2	3:15 PM		0	0	0	0
3:30 PM		0	0	4	4	3:30 PM		0	0	0	0
3:45 PM		0	0	3	3	3:45 PM		0	0	0	0
Count Total		0	0	22	22	Count Total		0	0	0	0
Peak Hour		0	0	12	12	Peak Hour		0	0	0	0

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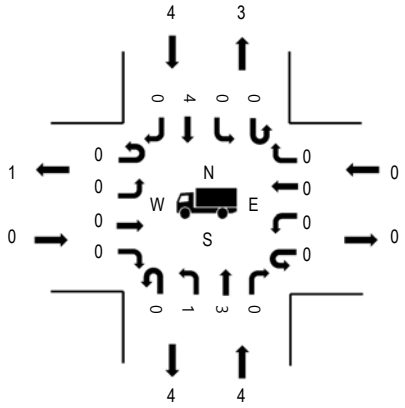
Location: 1 WA 903 & E PENNSYLVANIA AVE PM
Date: Friday, December 6, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

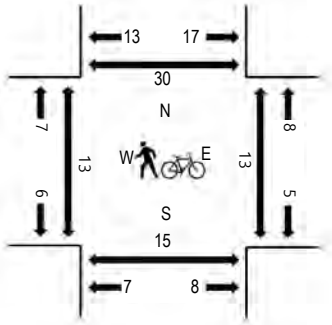
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.71
WB	0.0%	0.75
NB	1.6%	0.78
SB	3.0%	0.87
All	1.8%	0.96

Traffic Counts - Motorized Vehicles

Interval Start Time	E PENNSYLVANIA AVE Eastbound				E PENNSYLVANIA AVE Westbound				WA 903 Northbound				WA 903 Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	2	2	11	0	2	0	2	0	15	42	2	0	0	22	2	102	380
2:15 PM	0	3	2	8	0	3	1	1	0	6	32	2	0	0	22	1	81	379
2:30 PM	0	2	2	7	0	4	0	0	0	7	46	5	0	0	27	3	103	414
2:45 PM	0	1	2	5	1	0	1	0	0	12	42	2	0	0	24	4	94	423
3:00 PM	0	2	2	7	0	4	0	0	0	9	35	3	0	0	38	1	101	444
3:15 PM	0	7	4	8	0	0	2	1	0	5	50	3	0	0	31	5	116	
3:30 PM	0	1	2	9	0	0	1	1	0	8	49	3	0	2	34	2	112	
3:45 PM	0	3	0	9	0	1	0	2	0	10	67	1	0	1	20	1	115	
Count Total	0	21	16	64	1	14	5	7	0	72	363	21	0	3	218	19	824	
Peak Hour	0	13	8	33	0	5	3	4	0	32	201	10	0	3	123	9	444	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

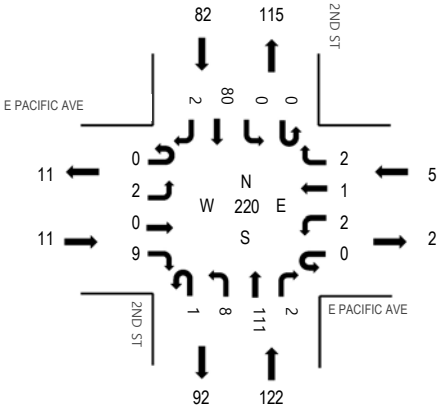
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	0	2	0	4	6	2:00 PM	0	1	3	7	11
2:15 PM	0	1	0	3	4	2:15 PM	2	5	1	8	16
2:30 PM	0	2	0	1	3	2:30 PM	13	1	3	10	27
2:45 PM	0	1	0	1	2	2:45 PM	4	5	3	3	15
3:00 PM	0	1	0	2	3	3:00 PM	0	4	2	6	12
3:15 PM	0	0	0	1	1	3:15 PM	2	6	5	12	25
3:30 PM	0	0	0	0	0	3:30 PM	5	2	3	6	16
3:45 PM	0	3	0	1	4	3:45 PM	6	3	3	6	18
Count Total	0	10	0	13	23	Count Total	32	27	23	58	140
Peak Hour	0	4	0	4	8	Peak Hour	13	15	13	30	71

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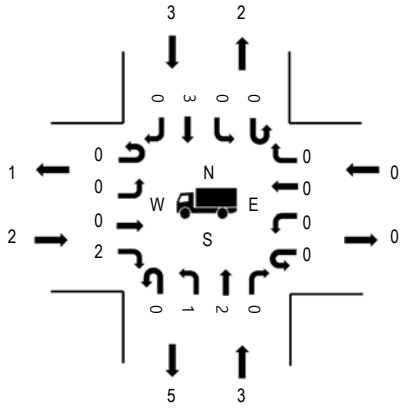
Location: 2 2ND ST & E PACIFIC AVE PM
Date: Friday, December 6, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

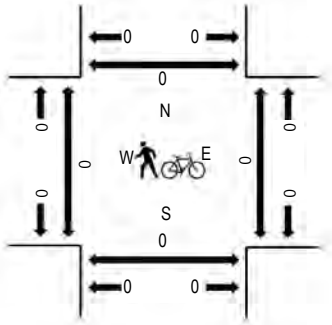
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	18.2%	0.92
WB	0.0%	0.63
NB	2.5%	0.85
SB	3.7%	0.76
All	3.6%	0.82

Traffic Counts - Motorized Vehicles

Interval Start Time	E PACIFIC AVE Eastbound				E PACIFIC AVE Westbound				2ND ST Northbound				2ND ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	1	0	3	0	0	0	0	0	1	27	1	0	0	18	1	52	181
2:15 PM	0	1	0	2	0	0	0	1	0	2	28	0	0	0	16	0	50	178
2:30 PM	0	1	0	2	0	2	0	0	0	0	16	1	0	1	12	1	36	180
2:45 PM	0	0	0	1	0	1	0	1	0	1	26	0	0	0	13	0	43	196
3:00 PM	0	0	0	2	0	0	0	1	1	4	21	1	0	0	19	0	49	220
3:15 PM	0	1	0	2	0	1	0	0	0	1	27	0	0	0	20	0	52	
3:30 PM	0	0	0	3	0	0	1	1	0	2	29	0	0	0	16	0	52	
3:45 PM	0	1	0	2	0	1	0	0	0	1	34	1	0	0	25	2	67	
Count Total	0	5	0	17	0	5	1	4	1	12	208	4	0	1	139	4	401	
Peak Hour	0	2	0	9	0	2	1	2	1	8	111	2	0	0	80	2	220	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

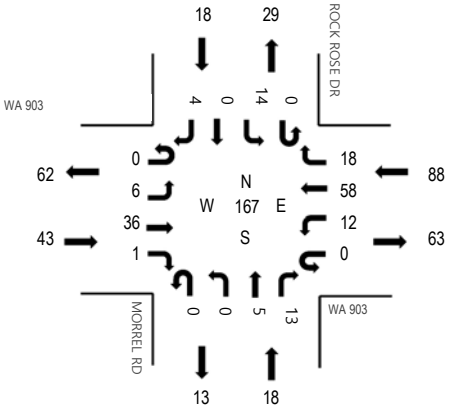
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	0	1	0	1	2	2:00 PM	0	1	1	0	2
2:15 PM	0	2	0	1	3	2:15 PM	1	8	0	0	9
2:30 PM	0	0	0	1	1	2:30 PM	0	0	0	0	0
2:45 PM	1	1	0	0	2	2:45 PM	0	0	0	0	0
3:00 PM	1	1	0	0	2	3:00 PM	0	0	0	0	0
3:15 PM	0	0	0	0	0	3:15 PM	0	0	0	0	0
3:30 PM	1	0	0	1	2	3:30 PM	0	0	0	0	0
3:45 PM	0	2	0	2	4	3:45 PM	0	0	0	0	0
Count Total	3	7	0	6	16	Count Total	1	9	1	0	11
Peak Hour	2	3	0	3	8	Peak Hour	0	0	0	0	0

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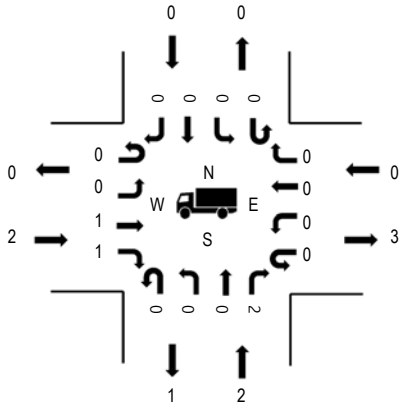
Location: 3 MORREL RD & WA 903 PM
Date: Friday, December 6, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

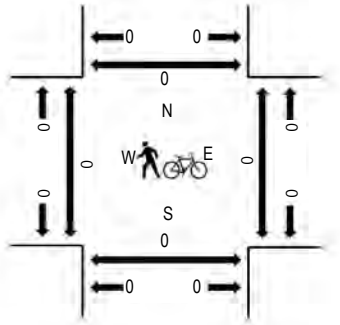
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.7%	0.77
WB	0.0%	0.73
NB	11.1%	0.90
SB	0.0%	0.75
All	2.4%	0.85

Traffic Counts - Motorized Vehicles

Interval Start Time	WA 903 Eastbound				WA 903 Westbound				MORREL RD Northbound				ROCK ROSE DR Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
2:00 PM	0	0	10	0	0	2	10	1	0	0	2	4	0	2	0	0	31	127
2:15 PM	0	0	9	0	0	6	17	6	0	0	0	3	0	0	1	2	44	132
2:30 PM	0	0	6	1	0	0	10	1	0	0	0	2	0	1	0	1	22	134
2:45 PM	0	0	8	1	0	2	11	4	0	0	0	3	0	1	0	0	30	148
3:00 PM	0	0	6	0	0	5	11	4	0	0	2	3	0	5	0	0	36	167
3:15 PM	0	2	11	1	0	2	12	8	0	0	2	3	0	4	0	1	46	
3:30 PM	0	3	6	0	0	1	13	2	0	0	1	4	0	3	0	3	36	
3:45 PM	0	1	13	0	0	4	22	4	0	0	0	3	0	2	0	0	49	
Count Total	0	6	69	3	0	22	106	30	0	0	7	25	0	18	1	7	294	
Peak Hour	0	6	36	1	0	12	58	18	0	0	5	13	0	14	0	4	167	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
2:00 PM	0	1	0	0	1	2:00 PM	0	0	0	0	0
2:15 PM	0	0	2	1	3	2:15 PM	0	0	0	1	1
2:30 PM	1	0	0	1	2	2:30 PM	0	0	0	0	0
2:45 PM	0	0	0	0	0	2:45 PM	0	0	0	0	0
3:00 PM	0	1	0	0	1	3:00 PM	0	0	0	0	0
3:15 PM	1	0	0	0	1	3:15 PM	0	0	0	0	0
3:30 PM	0	1	0	0	1	3:30 PM	0	0	0	0	0
3:45 PM	1	0	0	0	1	3:45 PM	0	0	0	0	0
Count Total	3	3	2	2	10	Count Total	0	0	0	1	1
Peak Hour	2	2	0	0	4	Peak Hour	0	0	0	0	0

APPENDIX A (continued)

Raw Traffic Counts

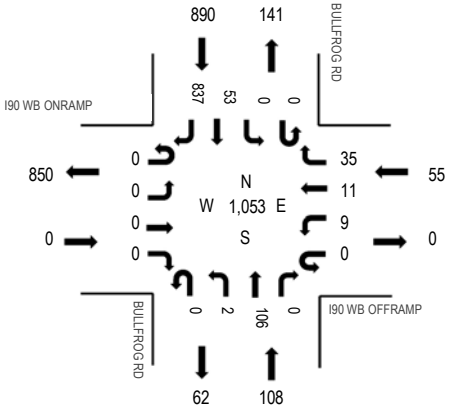
Sunday Data Sheets

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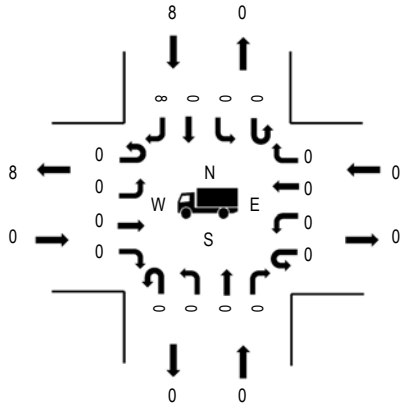
Location: 1 BULLFROG RD & I90 WB OFFRAMP PM
Date: Sunday, August 18, 2019
Peak Hour: 03:30 PM - 04:30 PM

Peak Hour

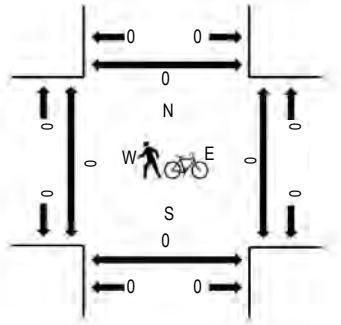
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	0.0%	0.72
NB	0.0%	0.73
SB	0.9%	0.93
All	0.8%	0.93

Traffic Counts - All Vehicles

Interval Start Time	I90 WB ONRAMP Eastbound				I90 WB OFFRAMP Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	0	0	0	3	3	5	0	1	25	0	0	0	13	159	209	991
3:15 PM	0	0	0	0	0	0	4	10	0	0	33	0	0	0	22	166	235	1,044
3:30 PM	0	0	0	0	0	2	5	7	0	1	36	0	0	0	16	196	263	1,053
3:45 PM	0	0	0	0	0	3	3	13	0	0	26	0	0	0	17	222	284	1,009
4:00 PM	0	0	0	0	0	2	3	10	0	1	22	0	0	0	13	211	262	943
4:15 PM	0	0	0	0	0	2	0	5	0	0	22	0	0	0	7	208	244	
4:30 PM	0	0	0	0	0	4	1	6	0	3	17	0	0	0	8	180	219	
4:45 PM	0	0	0	0	0	3	3	12	0	0	22	0	0	0	7	171	218	
Count Total	0	0	0	0	0	19	22	68	0	6	203	0	0	0	103	1,513	1,934	
Peak Hour	0	0	0	0	0	9	11	35	0	2	106	0	0	0	53	837	1,053	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

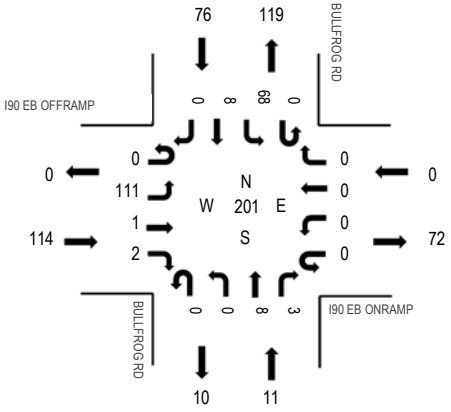
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	1	0	2	3	3:00 PM	0	0	0	0	0
3:15 PM	0	0	0	3	3	3:15 PM	0	0	0	0	0
3:30 PM	0	0	0	0	0	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	3	3	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	3	3	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	2	2	4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	2	2	4:30 PM	0	0	0	0	0
4:45 PM	0	0	1	5	6	4:45 PM	0	0	0	0	0
Count Total	0	1	1	20	22	Count Total	0	0	0	0	0
Peak Hour	0	0	0	8	8	Peak Hour	0	0	0	0	0

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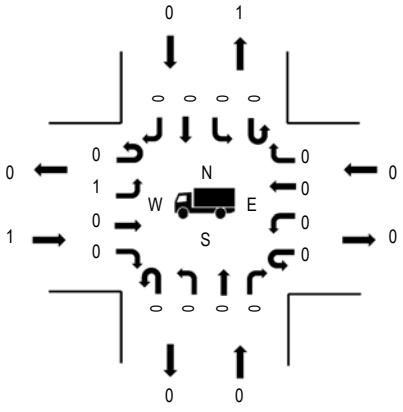
Location: 2 BULLFROG RD & I90 EB ONRAMP PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

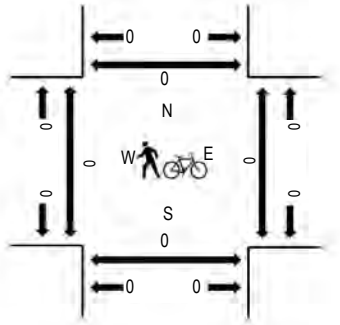
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.9%	0.79
WB	0.0%	0.00
NB	0.0%	0.55
SB	0.0%	0.86
All	0.5%	0.85

Traffic Counts - All Vehicles

Interval Start Time	I90 EB OFFRAMP Eastbound				I90 EB ONRAMP Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	19	0	1	0	0	0	0	0	0	3	1	0	12	4	0	40	201
3:15 PM	0	32	0	0	0	0	0	0	0	0	1	1	0	22	0	0	56	200
3:30 PM	0	34	1	1	0	0	0	0	0	0	4	1	0	16	2	0	59	176
3:45 PM	0	26	0	0	0	0	0	0	0	0	0	0	0	18	2	0	46	150
4:00 PM	0	21	1	0	0	0	0	0	0	0	2	0	0	13	2	0	39	135
4:15 PM	0	20	0	1	0	0	0	0	0	0	2	0	0	9	0	0	32	
4:30 PM	0	18	0	0	0	0	0	0	0	0	3	0	0	9	3	0	33	
4:45 PM	0	20	0	0	0	0	0	0	0	0	1	0	0	10	0	0	31	
Count Total	0	190	2	3	0	0	0	0	0	0	16	3	0	109	13	0	336	
Peak Hour	0	111	1	2	0	0	0	0	0	0	8	3	0	68	8	0	201	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

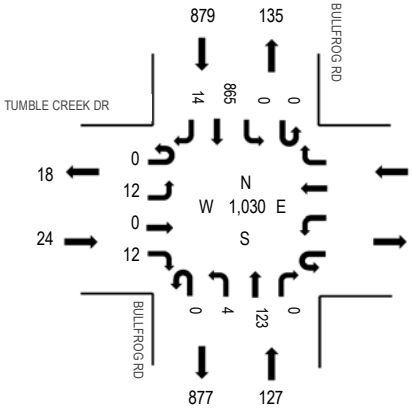
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	0	0	0	1	3:00 PM	0	0	0	0	0
3:15 PM	0	0	0	0	0	3:15 PM	0	0	0	0	0
3:30 PM	0	0	0	0	0	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	0	0	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	0	0	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0	4:45 PM	0	0	0	0	0
Count Total	1	0	0	0	1	Count Total	0	0	0	0	0
Peak Hour	1	0	0	0	1	Peak Hour	0	0	0	0	0

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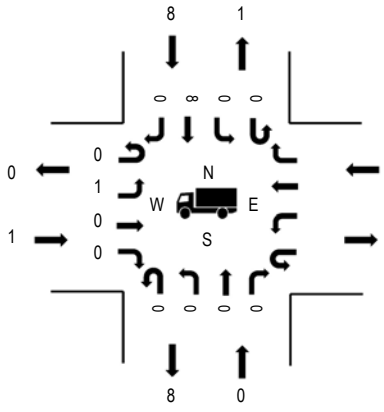
Location: 3 BULLFROG RD & TUMBLE CREEK DR PM
Date: Sunday, August 18, 2019
Peak Hour: 03:30 PM - 04:30 PM

Peak Hour

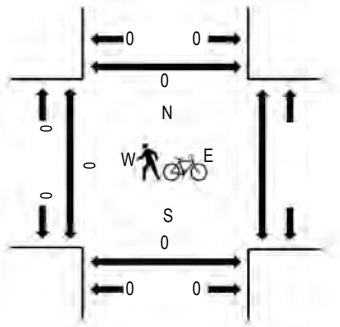
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.2%	0.75
WB		
NB	0.0%	0.79
SB	0.9%	0.93
All	0.9%	0.91

Traffic Counts - All Vehicles

Interval Start Time	TUMBLE CREEK DR Eastbound				Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	1	0	4					0	2	27	0	0	0	159	1	194	969
3:15 PM	0	2	0	3					0	2	34	0	0	0	195	2	238	1,026
3:30 PM	0	4	0	4					0	1	36	0	0	0	207	1	253	1,030
3:45 PM	0	6	0	1					0	1	39	0	0	0	235	2	284	980
4:00 PM	0	1	0	3					0	0	25	0	0	0	216	6	251	927
4:15 PM	0	1	0	4					0	2	23	0	0	0	207	5	242	
4:30 PM	0	3	0	1					0	2	17	0	0	0	175	5	203	
4:45 PM	0	9	0	1					1	1	33	0	0	0	179	7	231	
Count Total	0	27	0	21					1	11	234	0	0	0	1,573	29	1,896	
Peak Hour	0	12	0	12					0	4	123	0	0	0	865	14	1,030	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

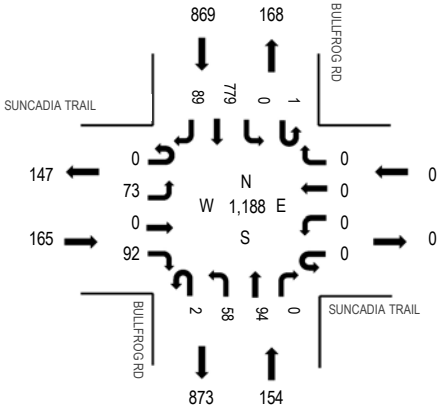
Interval Start Time	Heavy Vehicles EB	NB	WB	SB	Total	Interval Start Time	Pedestrians/Bicycles on Crosswalk EB	NB	WB	SB	Total
3:00 PM	0	1		2	3	3:00 PM	0	0		0	0
3:15 PM	0	0		3	3	3:15 PM	0	0		0	0
3:30 PM	1	0		0	1	3:30 PM	0	0		0	0
3:45 PM	0	0		4	4	3:45 PM	0	0		0	0
4:00 PM	0	0		2	2	4:00 PM	0	0		0	0
4:15 PM	0	0		2	2	4:15 PM	0	0		0	0
4:30 PM	0	0		2	2	4:30 PM	0	0		0	0
4:45 PM	0	0		3	3	4:45 PM	0	0		0	0
Count Total	1	1		18	20	Count Total	0	0		0	0
Peak Hour	1	0		8	9	Peak Hour	0	0		0	0

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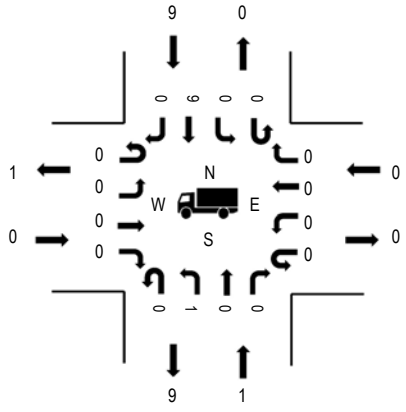
Location: 4 BULLFROG RD & SUNCADIA TRAIL PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

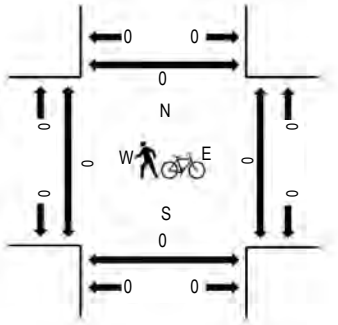
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.81
WB	0.0%	0.00
NB	0.6%	0.77
SB	1.0%	0.92
All	0.8%	0.92

Traffic Counts - All Vehicles

Interval Start Time	SUNCADIA TRAIL Eastbound				SUNCADIA TRAIL Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	21	0	13	0	0	0	0	2	10	16	0	1	0	146	25	234	1,134
3:15 PM	0	26	0	25	0	0	0	0	0	12	25	0	0	0	170	22	280	1,188
3:30 PM	0	22	0	20	0	0	0	0	1	14	27	0	1	0	190	21	296	1,177
3:45 PM	0	10	0	29	0	0	0	0	1	20	29	0	0	0	215	20	324	1,106
4:00 PM	0	15	0	18	0	0	0	0	0	12	13	0	0	0	204	26	288	1,051
4:15 PM	0	10	0	16	0	0	0	0	2	5	20	0	0	0	200	16	269	
4:30 PM	0	22	0	20	0	0	0	0	0	12	9	0	0	0	143	19	225	
4:45 PM	0	17	0	24	0	0	0	0	2	15	24	0	2	0	163	22	269	
Count Total	0	143	0	165	0	0	0	0	8	100	163	0	4	0	1,431	171	2,185	
Peak Hour	0	73	0	92	0	0	0	0	2	58	94	0	1	0	779	89	1,188	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

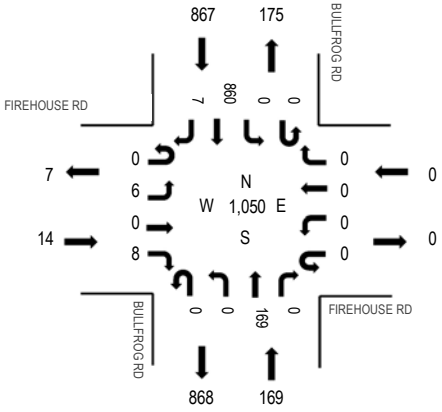
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	1	0	2	3	3:00 PM	0	0	0	0	0
3:15 PM	0	0	0	3	3	3:15 PM	0	0	0	0	0
3:30 PM	0	1	0	0	1	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	5	5	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	1	1	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	2	2	4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	2	2	4:30 PM	0	0	0	0	0
4:45 PM	0	1	0	4	5	4:45 PM	0	0	0	0	0
Count Total	0	3	0	19	22	Count Total	0	0	0	0	0
Peak Hour	0	1	0	9	10	Peak Hour	0	0	0	0	0

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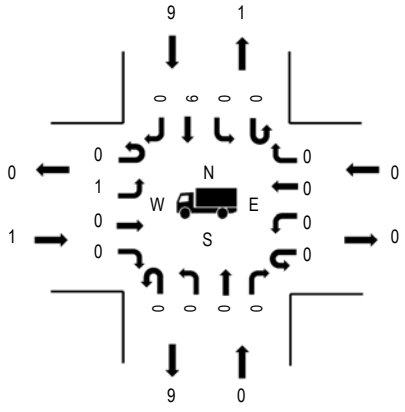
Location: 5 BULLFROG RD & FIREHOUSE RD PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

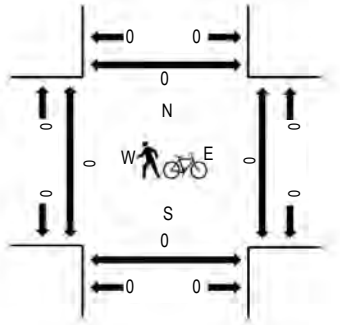
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	7.1%	0.50
WB	0.0%	0.00
NB	0.0%	0.83
SB	1.0%	0.94
All	1.0%	0.97

Traffic Counts - All Vehicles

Interval Start Time	FIREHOUSE RD Eastbound				FIREHOUSE RD Westbound				BULLFROG RD Northbound				BULLFROG RD Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	6	0	1	0	0	0	0	0	1	36	0	0	0	171	2	217	1,004
3:15 PM	0	3	0	4	0	0	0	0	0	0	50	0	0	0	188	5	250	1,050
3:30 PM	0	1	0	1	0	0	0	0	0	0	51	0	0	0	215	2	270	1,045
3:45 PM	0	1	0	1	0	0	0	0	0	0	39	0	0	0	226	0	267	985
4:00 PM	0	1	0	2	0	0	0	0	0	0	29	0	0	0	231	0	263	940
4:15 PM	0	3	0	2	0	0	0	0	0	1	29	0	0	0	206	4	245	
4:30 PM	0	4	0	1	0	0	1	0	0	0	31	0	0	1	169	3	210	
4:45 PM	0	3	0	0	0	0	0	0	0	0	40	0	0	0	177	2	222	
Count Total	0	22	0	12	0	0	1	0	0	2	305	0	0	1	1,583	18	1,944	
Peak Hour	0	6	0	8	0	0	0	0	0	0	169	0	0	0	860	7	1,050	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

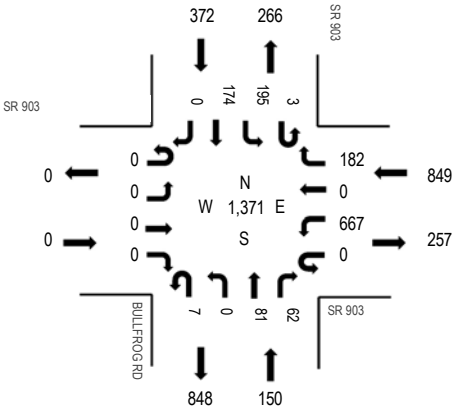
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	1	0	3	5	3:00 PM	0	0	0	0	0
3:15 PM	1	0	0	2	3	3:15 PM	0	0	0	0	0
3:30 PM	0	0	0	0	0	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	5	5	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	2	2	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	2	2	4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	3	3	4:30 PM	0	0	0	0	0
4:45 PM	0	1	0	3	4	4:45 PM	0	0	0	0	0
Count Total	2	2	0	20	24	Count Total	0	0	0	0	0
Peak Hour	1	0	0	9	10	Peak Hour	0	0	0	0	0

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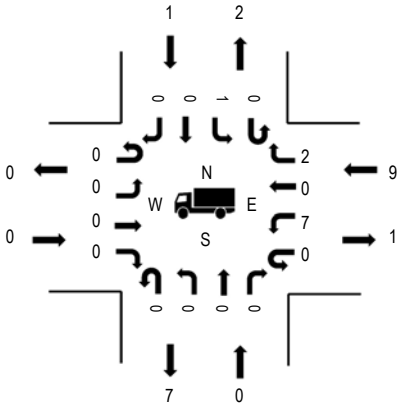
Location: 6 BULLFROG RD & SR 903 PM
Date: Sunday, August 18, 2019
Peak Hour: 03:30 PM - 04:30 PM

Peak Hour

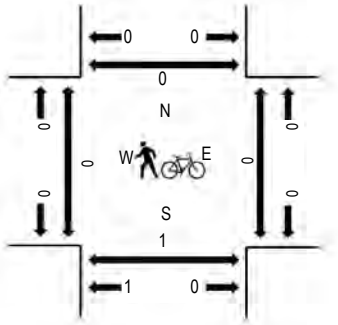
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	1.1%	0.92
NB	0.0%	0.78
SB	0.3%	0.82
All	0.7%	0.94

Traffic Counts - All Vehicles

Interval Start Time	SR 903 Eastbound				SR 903 Westbound				BULLFROG RD Northbound				SR 903 Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	0	0	0	107	0	47	2	0	17	19	0	44	59	0	295	1,338
3:15 PM	0	0	0	0	0	152	0	38	2	0	30	18	0	50	45	0	335	1,360
3:30 PM	0	0	0	0	0	174	0	57	3	0	24	21	1	54	32	0	366	1,371
3:45 PM	0	0	0	0	0	169	0	36	3	0	23	16	1	47	47	0	342	1,284
4:00 PM	0	0	0	0	0	179	0	36	1	0	13	12	1	38	37	0	317	1,253
4:15 PM	0	0	0	0	0	145	0	53	0	0	21	13	0	56	58	0	346	
4:30 PM	0	0	0	0	0	126	0	19	0	0	17	20	1	53	43	0	279	
4:45 PM	0	0	0	0	0	142	0	43	1	0	18	24	0	44	39	0	311	
Count Total	0	0	0	0	0	1,194	0	329	12	0	163	143	4	386	360	0	2,591	
Peak Hour	0	0	0	0	0	667	0	182	7	0	81	62	3	195	174	0	1,371	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles				
	EB	NB	WB	SB	Total
3:00 PM	0	2	3	3	8
3:15 PM	0	1	5	0	6
3:30 PM	0	0	1	0	1
3:45 PM	0	0	4	1	5
4:00 PM	0	0	2	0	2
4:15 PM	0	0	2	0	2
4:30 PM	0	0	4	1	5
4:45 PM	0	0	1	0	1
Count Total	0	3	22	5	30
Peak Hour	0	0	9	1	10

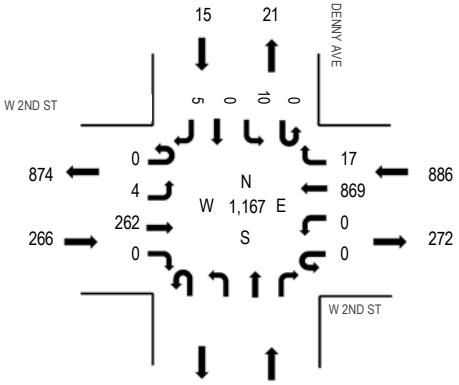
Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total
3:00 PM	0	0	0	0	0
3:15 PM	0	0	0	0	0
3:30 PM	0	1	0	0	1
3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0
Count Total	0	1	0	0	1
Peak Hour	0	1	0	0	1

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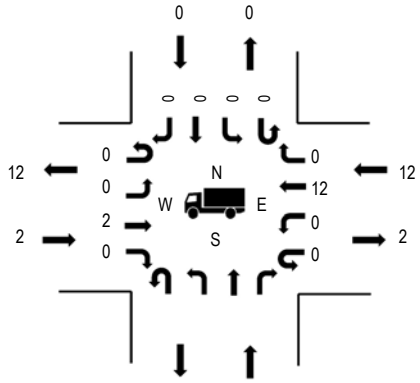
Location: 7 DENNY AVE & W 2ND ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

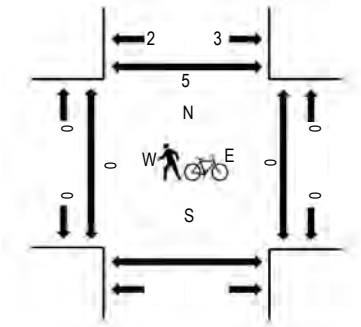
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.8%	0.96
WB	1.4%	0.95
NB		
SB	0.0%	0.75
All	1.2%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				Northbound				DENNY AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	69	0	0	0	158	2					0	4	0	2	235	1,118
3:15 PM	0	1	67	0	0	0	209	4					0	3	0	2	286	1,167
3:30 PM	0	1	68	0	0	0	230	4					0	1	0	1	305	1,152
3:45 PM	0	0	68	0	0	0	218	3					0	3	0	0	292	1,095
4:00 PM	0	2	59	0	0	0	212	6					0	3	0	2	284	1,057
4:15 PM	0	1	57	0	0	0	200	5					0	5	0	3	271	
4:30 PM	0	1	81	0	0	0	161	2					0	3	0	0	248	
4:45 PM	0	3	68	0	0	0	174	2					0	6	0	1	254	
Count Total	0	9	537	0	0	0	1,562	28					0	28	0	11	2,175	
Peak Hour	0	4	262	0	0	0	869	17					0	10	0	5	1,167	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

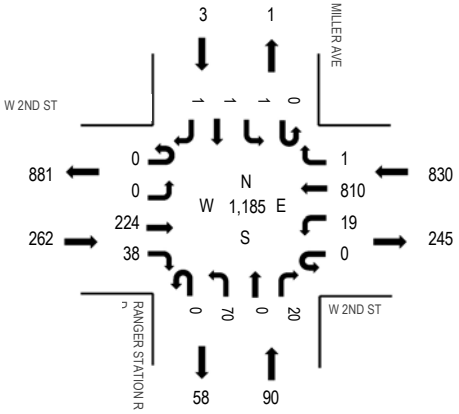
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	3		4	0	7	3:00 PM	0		0	0	0
3:15 PM	1		3	0	4	3:15 PM	0		0	0	0
3:30 PM	0		2	0	2	3:30 PM	0		0	0	0
3:45 PM	1		4	0	5	3:45 PM	0		0	1	1
4:00 PM	0		3	0	3	4:00 PM	0		0	4	4
4:15 PM	0		2	0	2	4:15 PM	0		0	0	0
4:30 PM	0		5	0	5	4:30 PM	0		0	0	0
4:45 PM	0		0	0	0	4:45 PM	0		0	0	0
Count Total	5		23	0	28	Count Total	0		0	5	5
Peak Hour	2		12	0	14	Peak Hour	0		0	5	5

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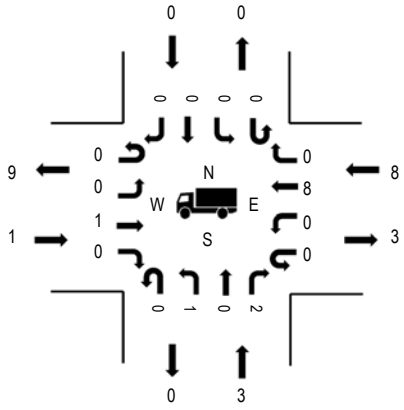
Location: 8 RANGER STATION RD & W 2ND ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:30 PM - 04:30 PM

Peak Hour

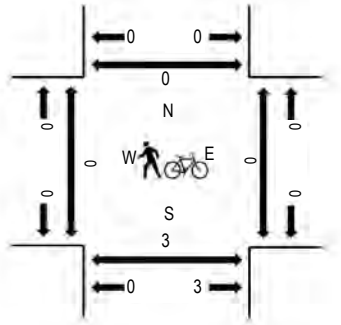
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.4%	0.90
WB	1.0%	0.96
NB	3.3%	0.87
SB	0.0%	0.75
All	1.0%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				RANGER STATION RD Northbound				MILLER AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	66	11	0	3	146	1	0	17	1	6	0	0	0	0	251	1,147
3:15 PM	0	0	53	8	0	3	192	0	0	22	0	4	0	1	0	0	283	1,184
3:30 PM	0	0	60	8	0	4	212	0	0	19	0	4	0	0	0	1	308	1,185
3:45 PM	0	0	61	12	0	3	208	1	0	11	0	9	0	0	0	0	305	1,141
4:00 PM	0	0	55	5	0	7	199	0	0	19	0	2	0	0	1	0	288	1,093
4:15 PM	0	0	48	13	0	5	191	0	0	21	0	5	0	1	0	0	284	
4:30 PM	0	0	77	12	0	0	147	3	0	15	1	8	0	0	0	1	264	
4:45 PM	0	0	66	4	0	3	157	0	0	23	0	4	0	0	0	0	257	
Count Total	0	0	486	73	0	28	1,452	5	0	147	2	42	0	2	1	2	2,240	
Peak Hour	0	0	224	38	0	19	810	1	0	70	0	20	0	1	1	1	1,185	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

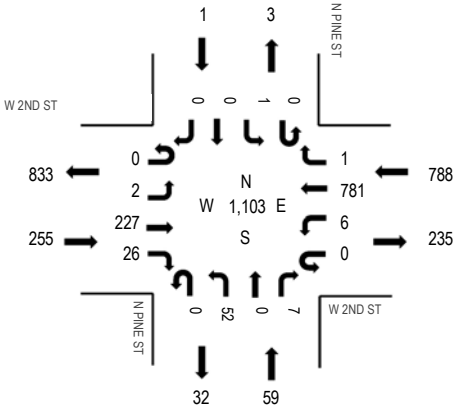
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	0	3	0	4	3:00 PM	0	0	0	0	0
3:15 PM	2	2	2	0	6	3:15 PM	0	1	0	0	1
3:30 PM	0	1	2	0	3	3:30 PM	0	3	0	0	3
3:45 PM	1	1	2	0	4	3:45 PM	0	0	0	0	0
4:00 PM	0	1	2	0	3	4:00 PM	0	0	0	0	0
4:15 PM	0	0	2	0	2	4:15 PM	0	0	0	0	0
4:30 PM	0	0	6	0	6	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0	4:45 PM	0	0	0	0	0
Count Total	4	5	19	0	28	Count Total	0	4	0	0	4
Peak Hour	1	3	8	0	12	Peak Hour	0	3	0	0	3

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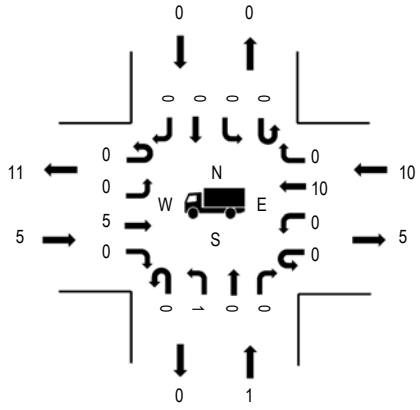
Location: 9 N PINE ST & W 2ND ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

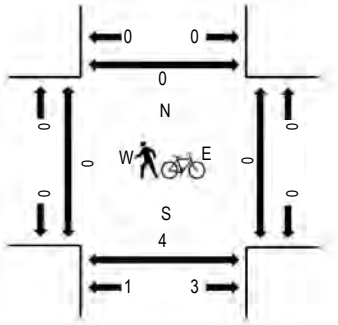
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	2.0%	0.91
WB	1.3%	0.95
NB	1.7%	0.87
SB	0.0%	0.25
All	1.5%	0.95

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N PINE ST Northbound				N PINE ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	63	10	0	2	135	1	0	12	0	4	0	1	0	1	229	1,068
3:15 PM	0	1	54	4	0	2	183	1	0	14	0	3	0	0	0	0	262	1,103
3:30 PM	0	1	62	6	0	2	205	0	0	13	0	1	0	0	0	0	290	1,091
3:45 PM	0	0	62	8	0	1	199	0	0	14	0	3	0	0	0	0	287	1,042
4:00 PM	0	0	49	8	0	1	194	0	0	11	0	0	0	1	0	0	264	985
4:15 PM	0	0	44	10	0	2	179	0	0	14	0	0	0	0	0	1	250	
4:30 PM	0	0	75	11	0	1	140	0	0	11	0	3	0	0	0	0	241	
4:45 PM	0	1	61	8	0	1	149	0	0	9	0	1	0	0	0	0	230	
Count Total	0	3	470	65	0	12	1,384	2	0	98	0	15	0	2	0	2	2,053	
Peak Hour	0	2	227	26	0	6	781	1	0	52	0	7	0	1	0	0	1,103	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

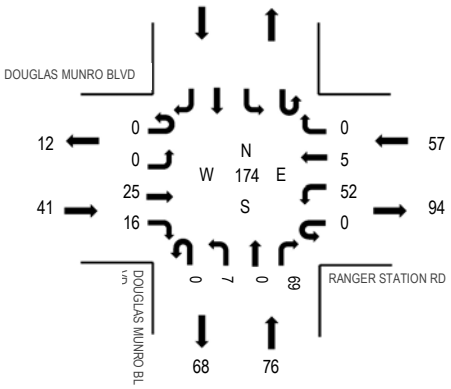
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	2	1	4	0	7	3:00 PM	0	1	1	0	2
3:15 PM	2	0	3	0	5	3:15 PM	0	1	0	0	1
3:30 PM	1	0	2	0	3	3:30 PM	0	3	0	0	3
3:45 PM	2	1	3	0	6	3:45 PM	0	0	0	0	0
4:00 PM	0	0	2	0	2	4:00 PM	0	0	0	0	0
4:15 PM	0	1	1	0	2	4:15 PM	0	0	0	0	0
4:30 PM	0	0	6	0	6	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0	4:45 PM	0	1	0	0	1
Count Total	7	3	21	0	31	Count Total	0	6	1	0	7
Peak Hour	5	1	10	0	16	Peak Hour	0	4	0	0	4

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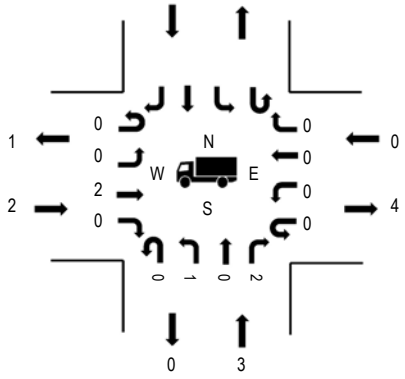
Location: 10 DOUGLAS MUNRO BLVD & RANGER STATION RD PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

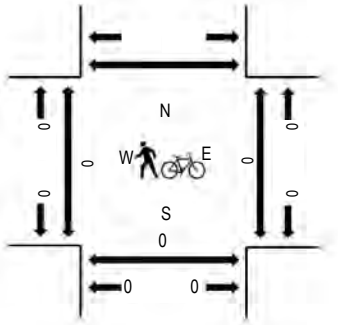
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	4.9%	0.79
WB	0.0%	0.84
NB	3.9%	0.73
SB		
All	2.9%	0.93

Traffic Counts - All Vehicles

Interval Start Time	DOUGLAS MUNRO BLVD Eastbound				RANGER STATION RD Westbound				DOUGLAS MUNRO BLVD Northbound				Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	7	1	0	9	0	0	1	1	0	14					33	169
3:15 PM	0	0	8	3	0	14	1	0	0	2	0	19					47	174
3:30 PM	0	0	3	4	0	11	3	0	0	2	0	24					47	172
3:45 PM	0	0	9	4	0	16	1	0	0	2	0	10					42	169
4:00 PM	0	0	5	5	0	11	0	0	0	1	0	16					38	170
4:15 PM	0	0	1	1	0	18	3	0	0	0	0	22					45	
4:30 PM	0	0	5	2	0	14	1	0	0	1	0	21					44	
4:45 PM	0	0	10	2	0	10	1	0	0	1	0	19					43	
Count Total	0	0	48	22	0	103	10	0	1	10	0	145					339	
Peak Hour	0	0	25	16	0	52	5	0	0	7	0	69					174	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

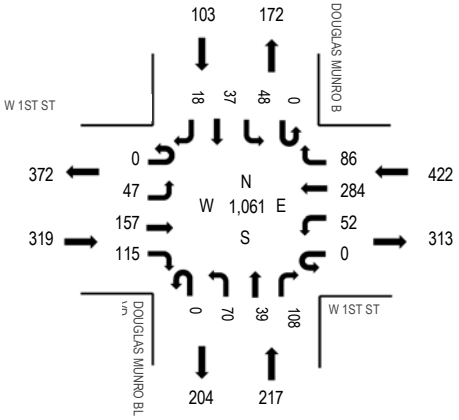
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	0	1		1	3:00 PM	0	1	0		1
3:15 PM	0	1	0		1	3:15 PM	0	0	0		0
3:30 PM	1	1	0		2	3:30 PM	0	0	0		0
3:45 PM	1	0	0		1	3:45 PM	0	0	0		0
4:00 PM	0	1	0		1	4:00 PM	0	0	0		0
4:15 PM	0	0	0		0	4:15 PM	0	0	0		0
4:30 PM	0	0	0		0	4:30 PM	0	0	0		0
4:45 PM	0	0	1		1	4:45 PM	0	0	0		0
Count Total	2	3	2		7	Count Total	0	1	0		1
Peak Hour	2	3	0		5	Peak Hour	0	0	0		0

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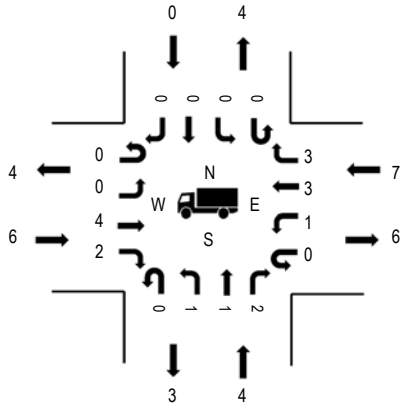
Location: 11 DOUGLAS MUNRO BLVD & W 1ST ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

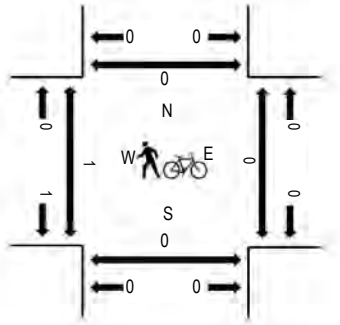
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.9%	0.88
WB	1.7%	0.84
NB	1.8%	0.89
SB	0.0%	0.80
All	1.6%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				DOUGLAS MUNRO BLVD Northbound				DOUGLAS MUNRO BLVD Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM	0	6	32	34	0	9	92	25	0	18	7	33	0	9	7	2	274	1,061
3:15 PM	0	14	35	28	0	16	75	14	0	12	15	34	0	17	9	6	275	1,048
3:30 PM	0	15	50	26	0	16	58	26	0	17	12	22	0	11	10	6	269	1,005
3:45 PM	0	12	40	27	0	11	59	21	0	23	5	19	0	11	11	4	243	990
4:00 PM	0	14	27	32	0	11	61	20	0	18	17	25	0	18	14	4	261	975
4:15 PM	0	9	32	17	0	14	70	14	0	13	16	21	0	13	9	4	232	
4:30 PM	0	15	36	24	0	9	67	21	0	20	17	22	0	13	7	3	254	
4:45 PM	0	9	25	30	0	13	54	19	0	15	16	22	0	13	9	3	228	
Count Total	0	94	277	218	0	99	536	160	0	136	105	198	0	105	76	32	2,036	
Peak Hour	0	47	157	115	0	52	284	86	0	70	39	108	0	48	37	18	1,061	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

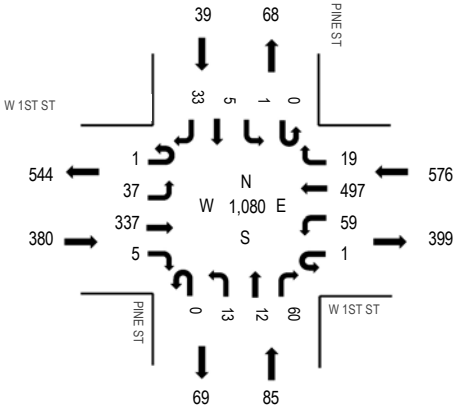
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	1	3	0	4	3:00 PM	0	0	0	0	0
3:15 PM	1	1	1	0	3	3:15 PM	0	0	0	0	0
3:30 PM	4	1	2	0	7	3:30 PM	0	0	0	0	0
3:45 PM	1	1	1	0	3	3:45 PM	1	0	0	0	1
4:00 PM	2	2	2	0	6	4:00 PM	0	0	0	0	0
4:15 PM	1	0	1	0	2	4:15 PM	0	0	0	0	0
4:30 PM	3	1	1	0	5	4:30 PM	0	0	0	0	0
4:45 PM	1	0	0	0	1	4:45 PM	0	4	0	0	4
Count Total	13	7	11	0	31	Count Total	1	4	0	0	5
Peak Hour	6	4	7	0	17	Peak Hour	1	0	0	0	1

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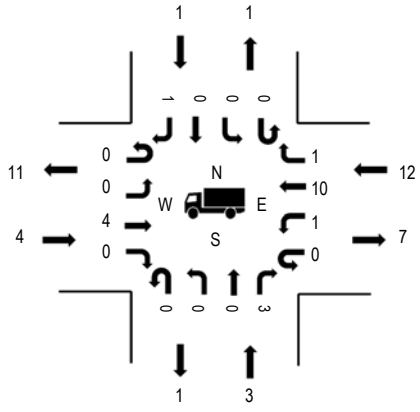
Location: 12 PINE ST & W 1ST ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

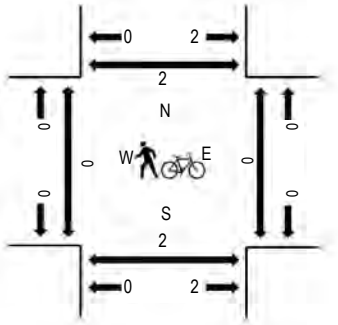
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.1%	0.90
WB	2.1%	0.88
NB	3.5%	0.89
SB	2.6%	0.70
All	1.9%	0.88

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				PINE ST Northbound				PINE ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	11	93	1	0	20	141	3	0	4	1	19	0	0	1	13	307	1,080
3:15 PM	0	8	93	1	0	10	118	6	0	3	6	14	0	1	2	4	266	1,018
3:30 PM	0	11	83	0	1	15	112	1	0	3	3	13	0	0	0	8	250	993
3:45 PM	1	7	68	3	0	14	126	9	0	3	2	14	0	0	2	8	257	1,001
4:00 PM	0	8	76	1	0	9	112	1	0	3	3	18	0	3	1	10	245	987
4:15 PM	1	7	79	1	0	10	105	4	0	6	2	15	0	1	2	8	241	
4:30 PM	0	5	82	3	0	15	111	5	0	7	4	13	0	0	2	11	258	
4:45 PM	0	4	74	0	0	17	109	5	0	4	1	20	0	1	2	6	243	
Count Total	2	61	648	10	1	110	934	34	0	33	22	126	0	6	12	68	2,067	
Peak Hour	1	37	337	5	1	59	497	19	0	13	12	60	0	1	5	33	1,080	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles				
	EB	NB	WB	SB	Total
3:00 PM	0	1	3	1	5
3:15 PM	0	1	3	0	4
3:30 PM	2	0	3	0	5
3:45 PM	2	1	3	0	6
4:00 PM	1	0	1	0	2
4:15 PM	2	0	1	0	3
4:30 PM	4	0	1	0	5
4:45 PM	1	0	0	0	1
Count Total	12	3	15	1	31
Peak Hour	4	3	12	1	20

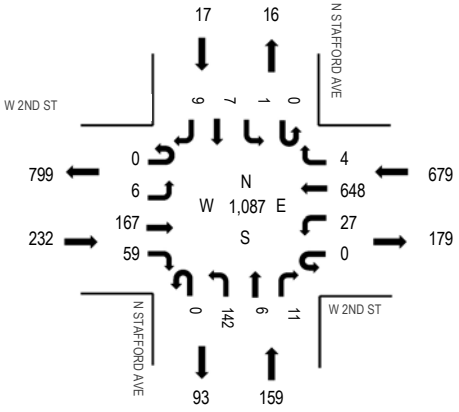
Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total
3:00 PM	0	2	0	0	2
3:15 PM	0	0	0	2	2
3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	0	0
4:15 PM	1	0	0	0	1
4:30 PM	0	1	0	0	1
4:45 PM	0	0	0	0	0
Count Total	1	3	0	2	6
Peak Hour	0	2	0	2	4

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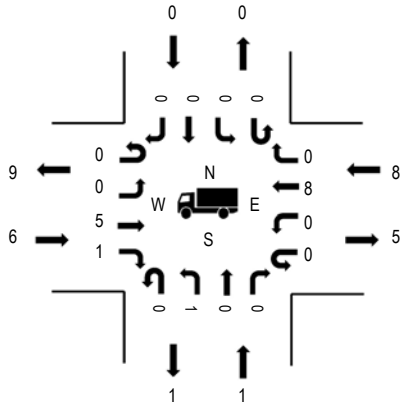
Location: 13 N STAFFORD AVE & W 2ND ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

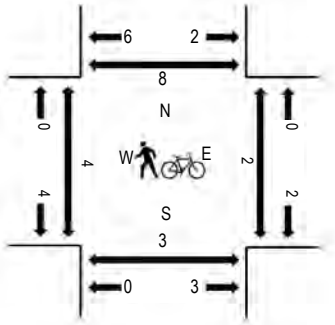
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	2.6%	0.92
WB	1.2%	0.99
NB	0.6%	0.85
SB	0.0%	0.71
All	1.4%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N STAFFORD AVE Northbound				N STAFFORD AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	1	57	10	0	9	118	1	0	19	2	1	0	0	3	4	225	1,050
3:15 PM	0	1	42	14	0	13	158	1	0	32	0	1	0	0	2	1	265	1,087
3:30 PM	0	1	50	11	0	6	163	0	0	41	4	2	0	1	1	4	284	1,066
3:45 PM	0	2	39	22	0	4	162	1	0	36	2	3	0	0	2	3	276	1,003
4:00 PM	0	2	36	12	0	4	165	2	0	33	0	5	0	0	2	1	262	963
4:15 PM	0	2	31	12	0	5	156	0	0	23	1	8	0	1	3	2	244	
4:30 PM	0	2	54	15	0	4	110	2	0	26	1	2	0	0	5	0	221	
4:45 PM	0	5	44	15	0	6	127	2	0	25	1	2	0	2	4	3	236	
Count Total	0	16	353	111	0	51	1,159	9	0	235	11	24	0	4	22	18	2,013	
Peak Hour	0	6	167	59	0	27	648	4	0	142	6	11	0	1	7	9	1,087	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

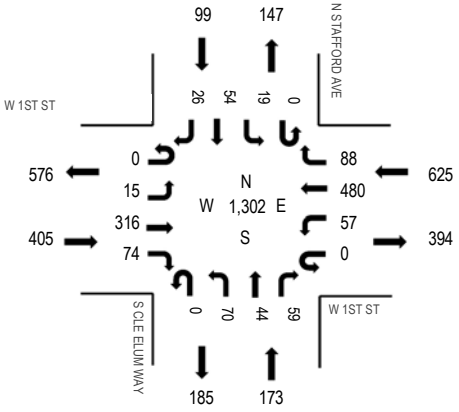
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	0	3	0	4	3:00 PM	0	1	1	2	4
3:15 PM	2	1	1	0	4	3:15 PM	1	0	2	2	5
3:30 PM	1	0	2	0	3	3:30 PM	0	3	0	0	3
3:45 PM	2	0	3	0	5	3:45 PM	0	0	0	4	4
4:00 PM	1	0	2	0	3	4:00 PM	3	0	0	2	5
4:15 PM	0	0	1	0	1	4:15 PM	0	0	0	3	3
4:30 PM	0	0	6	0	6	4:30 PM	0	1	0	0	1
4:45 PM	0	0	0	0	0	4:45 PM	0	1	0	0	1
Count Total	7	1	18	0	26	Count Total	4	6	3	13	26
Peak Hour	6	1	8	0	15	Peak Hour	4	3	2	8	17

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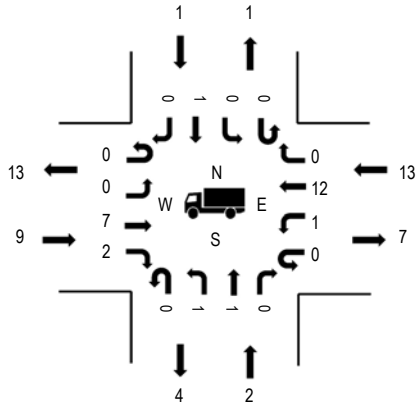
Location: 14 S CLE ELUM WAY & W 1ST ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

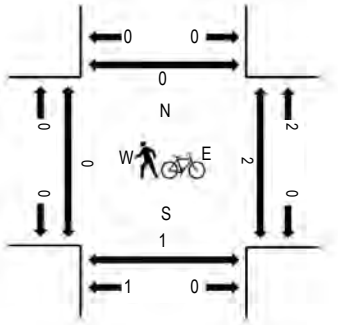
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	2.2%	0.90
WB	2.1%	0.95
NB	1.2%	0.82
SB	1.0%	0.83
All	1.9%	0.96

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				W 1ST ST Westbound				S CLE ELUM WAY Northbound				N STAFFORD AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	1	86	25	0	17	135	13	0	20	8	12	0	3	12	8	340	1,302
3:15 PM	0	2	86	20	0	7	119	27	0	14	8	16	0	6	17	7	329	1,255
3:30 PM	0	7	71	16	0	19	108	21	0	17	20	16	0	5	11	4	315	1,207
3:45 PM	0	5	73	13	0	14	118	27	0	19	8	15	0	5	14	7	318	1,201
4:00 PM	0	2	68	17	0	25	98	22	0	16	11	11	0	1	18	4	293	1,179
4:15 PM	0	5	77	18	0	8	97	17	0	18	11	12	0	3	11	4	281	
4:30 PM	0	4	63	22	0	20	114	14	0	12	10	22	0	6	17	5	309	
4:45 PM	0	1	69	28	0	16	115	17	0	10	9	6	0	1	14	10	296	
Count Total	0	27	593	159	0	126	904	158	0	126	85	110	0	30	114	49	2,481	
Peak Hour	0	15	316	74	0	57	480	88	0	70	44	59	0	19	54	26	1,302	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

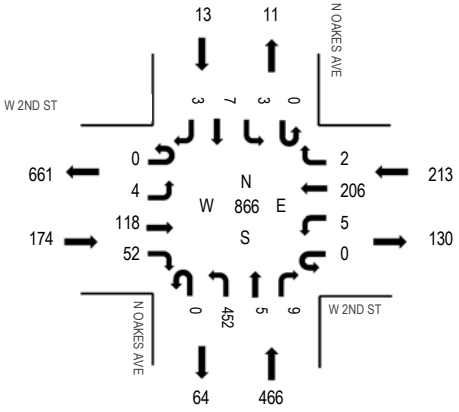
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	2	0	6	0	8	3:00 PM	0	0	0	0	0
3:15 PM	0	1	2	0	3	3:15 PM	0	1	0	0	1
3:30 PM	4	1	2	0	7	3:30 PM	0	0	0	0	0
3:45 PM	3	0	3	1	7	3:45 PM	0	0	2	0	2
4:00 PM	1	0	1	0	2	4:00 PM	3	0	0	0	3
4:15 PM	2	0	1	0	3	4:15 PM	0	0	1	0	1
4:30 PM	3	0	2	0	5	4:30 PM	1	0	0	0	1
4:45 PM	2	0	0	0	2	4:45 PM	0	0	0	0	0
Count Total	17	2	17	1	37	Count Total	4	1	3	0	8
Peak Hour	9	2	13	1	25	Peak Hour	0	1	2	0	3

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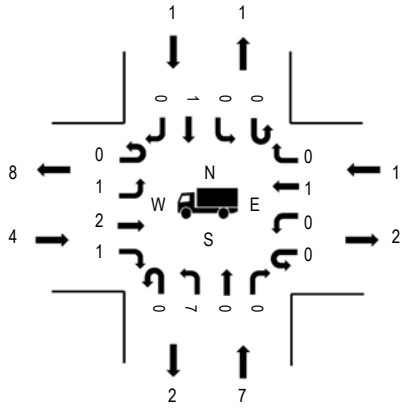
Location: 15 N OAKES AVE & W 2ND ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

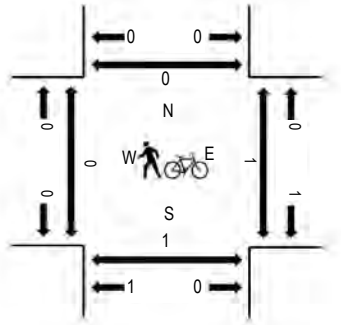
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	2.3%	0.85
WB	0.5%	0.87
NB	1.5%	0.92
SB	7.7%	0.41
All	1.5%	0.98

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N OAKES AVE Northbound				N OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	6	33	15	0	0	43	0	0	82	2	0	0	0	2	5	188	845
3:15 PM	0	0	27	12	0	1	60	0	0	107	1	3	0	1	3	1	216	866
3:30 PM	0	2	38	11	0	1	56	0	0	109	3	1	0	0	0	0	221	838
3:45 PM	0	2	28	19	0	2	44	1	0	114	1	1	0	2	4	2	220	798
4:00 PM	0	0	25	10	0	1	46	1	0	122	0	4	0	0	0	0	209	763
4:15 PM	0	1	23	10	0	0	32	1	0	113	2	3	0	0	2	1	188	
4:30 PM	0	2	36	19	0	0	32	1	0	84	1	3	0	1	1	1	181	
4:45 PM	0	2	25	16	0	2	36	1	0	90	8	2	0	1	0	2	185	
Count Total	0	15	235	112	0	7	349	5	0	821	18	17	0	5	12	12	1,608	
Peak Hour	0	4	118	52	0	5	206	2	0	452	5	9	0	3	7	3	866	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

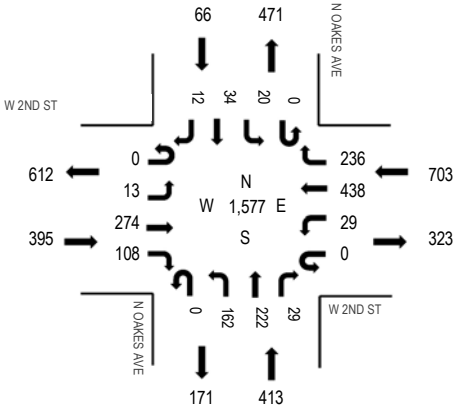
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	4	0	0	4	3:00 PM	0	0	0	0	0
3:15 PM	1	1	0	0	2	3:15 PM	0	0	0	0	0
3:30 PM	1	1	1	0	3	3:30 PM	0	0	0	0	0
3:45 PM	2	3	0	1	6	3:45 PM	0	1	1	0	2
4:00 PM	0	2	0	0	2	4:00 PM	0	0	0	0	0
4:15 PM	0	1	0	0	1	4:15 PM	0	0	0	0	0
4:30 PM	0	4	2	0	6	4:30 PM	0	0	2	0	2
4:45 PM	0	1	0	0	1	4:45 PM	1	0	0	0	1
Count Total	4	17	3	1	25	Count Total	1	1	3	0	5
Peak Hour	4	7	1	1	13	Peak Hour	0	1	1	0	2

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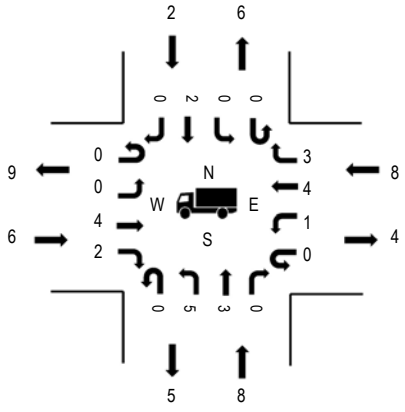
Location: 16 N OAKES AVE & W 2ND ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

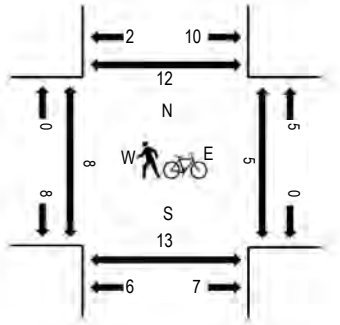
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.5%	0.85
WB	1.1%	0.96
NB	1.9%	0.88
SB	3.0%	0.61
All	1.5%	0.98

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N OAKES AVE Northbound				N OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	4	70	30	0	19	141	63	0	19	15	5	0	7	7	2	382	1,576
3:15 PM	0	6	78	32	0	8	123	52	0	36	49	3	0	6	6	3	402	1,577
3:30 PM	0	3	65	32	0	8	103	63	0	43	49	11	0	2	11	2	392	1,532
3:45 PM	0	0	69	20	0	7	104	56	0	47	64	6	0	7	15	5	400	1,532
4:00 PM	0	4	62	24	0	6	108	65	0	36	60	9	0	5	2	2	383	1,465
4:15 PM	0	3	67	25	0	8	89	50	0	34	63	6	0	2	8	2	357	
4:30 PM	0	2	73	22	0	6	125	39	0	46	49	7	0	10	9	4	392	
4:45 PM	0	7	55	17	0	3	94	34	0	41	61	2	0	11	6	2	333	
Count Total	0	29	539	202	0	65	887	422	0	302	410	49	0	50	64	22	3,041	
Peak Hour	0	13	274	108	0	29	438	236	0	162	222	29	0	20	34	12	1,577	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

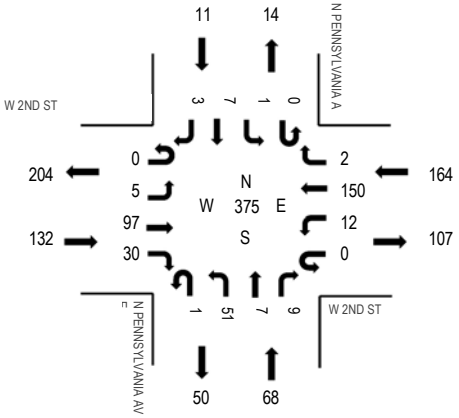
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	2	1	10	0	13	3:00 PM	0	2	4	5	11
3:15 PM	0	1	1	0	2	3:15 PM	2	4	2	0	8
3:30 PM	3	2	2	1	8	3:30 PM	0	4	0	10	14
3:45 PM	3	2	4	1	10	3:45 PM	4	2	3	2	11
4:00 PM	0	3	1	0	4	4:00 PM	2	3	0	0	5
4:15 PM	2	1	1	0	4	4:15 PM	0	1	0	0	1
4:30 PM	3	6	0	0	9	4:30 PM	0	3	2	0	5
4:45 PM	2	1	1	0	4	4:45 PM	0	7	6	0	13
Count Total	15	17	20	2	54	Count Total	8	26	17	17	68
Peak Hour	6	8	8	2	24	Peak Hour	8	13	5	12	38

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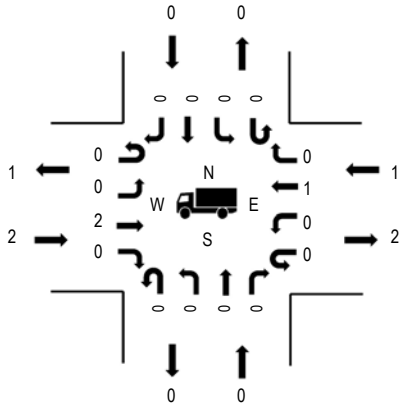
Location: 17 N PENNSYLVANIA AVE & W 2ND ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

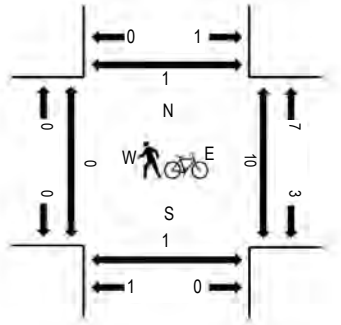
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.5%	0.80
WB	0.6%	0.79
NB	0.0%	0.85
SB	0.0%	0.46
All	0.8%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 2ND ST Eastbound				W 2ND ST Westbound				N PENNSYLVANIA AVE Northbound				N PENNSYLVANIA AVE Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM	0	0	28	5	0	4	29	1	0	9	3	2	0	1	4	1	87	375
3:15 PM	0	3	20	6	0	4	47	1	0	15	1	4	0	0	0	0	101	371
3:30 PM	0	1	26	14	0	2	40	0	0	15	0	1	0	0	1	1	101	336
3:45 PM	0	1	23	5	0	2	34	0	1	12	3	2	0	0	2	1	86	320
4:00 PM	0	3	19	7	0	4	30	0	0	16	1	1	0	0	1	1	83	301
4:15 PM	0	0	21	6	0	0	21	1	0	11	2	1	0	0	2	1	66	
4:30 PM	0	0	32	9	0	1	20	0	0	17	0	3	0	0	3	0	85	
4:45 PM	0	0	17	9	0	1	26	0	0	7	2	1	0	0	0	4	67	
Count Total	0	8	186	61	0	18	247	3	1	102	12	15	0	1	13	9	676	
Peak Hour	0	5	97	30	0	12	150	2	1	51	7	9	0	1	7	3	375	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

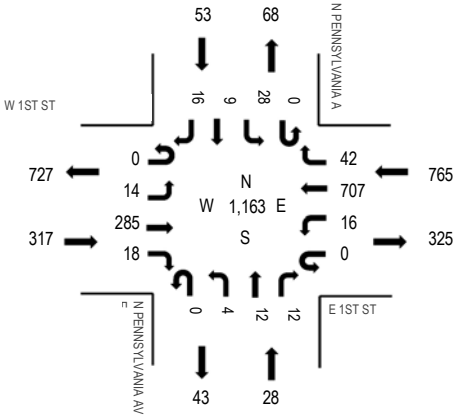
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	0	0	0	0	3:00 PM	0	1	4	0	5
3:15 PM	1	0	0	0	1	3:15 PM	0	0	4	0	4
3:30 PM	0	0	1	0	1	3:30 PM	0	0	2	1	3
3:45 PM	1	0	0	0	1	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	0	0	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	0	1	0	0	1	4:30 PM	0	0	1	0	1
4:45 PM	0	0	0	0	0	4:45 PM	0	1	0	0	1
Count Total	2	1	1	0	4	Count Total	0	2	11	1	14
Peak Hour	2	0	1	0	3	Peak Hour	0	1	10	1	12

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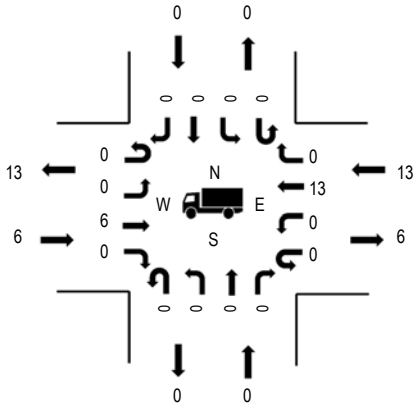
Location: 18 N PENNSYLVANIA AVE & E 1ST ST PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

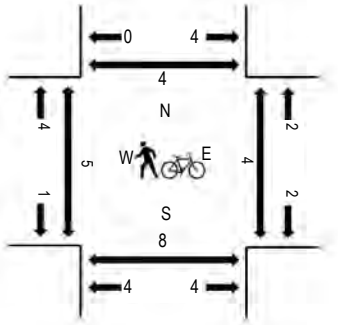
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.9%	0.98
WB	1.7%	0.87
NB	0.0%	0.88
SB	0.0%	0.66
All	1.6%	0.93

Traffic Counts - All Vehicles

Interval Start Time	W 1ST ST Eastbound				E 1ST ST Westbound				N PENNSYLVANIA AVE Northbound				N PENNSYLVANIA AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	4	69	5	0	2	209	9	0	0	2	3	0	2	1	6	312	1,163
3:15 PM	0	2	75	3	0	8	181	14	0	1	3	4	0	11	4	5	311	1,138
3:30 PM	0	2	69	7	0	3	167	10	0	2	3	2	0	9	3	4	281	1,070
3:45 PM	0	6	72	3	0	3	150	9	0	1	4	3	0	6	1	1	259	1,073
4:00 PM	0	6	68	4	0	5	168	14	0	4	2	2	0	7	2	5	287	1,037
4:15 PM	0	4	71	1	0	4	136	6	0	3	4	3	0	5	1	5	243	
4:30 PM	0	7	77	4	0	3	152	13	0	6	4	0	0	9	1	8	284	
4:45 PM	0	1	70	2	0	7	118	10	0	2	0	1	0	6	0	6	223	
Count Total	0	32	571	29	0	35	1,281	85	0	19	22	18	0	55	13	40	2,200	
Peak Hour	0	14	285	18	0	16	707	42	0	4	12	12	0	28	9	16	1,163	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

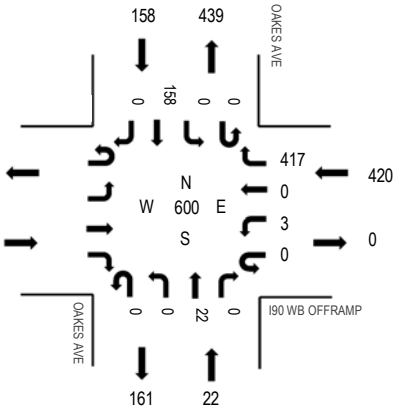
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	3	0	10	0	13	3:00 PM	5	2	0	0	7
3:15 PM	0	0	1	0	1	3:15 PM	0	2	3	0	5
3:30 PM	2	0	0	0	2	3:30 PM	0	3	1	1	5
3:45 PM	1	0	2	0	3	3:45 PM	0	1	0	3	4
4:00 PM	0	0	2	0	2	4:00 PM	0	5	2	2	9
4:15 PM	0	0	1	0	1	4:15 PM	0	3	0	0	3
4:30 PM	1	0	2	0	3	4:30 PM	0	4	3	2	9
4:45 PM	2	0	1	0	3	4:45 PM	0	2	0	0	2
Count Total	9	0	19	0	28	Count Total	5	22	9	8	44
Peak Hour	6	0	13	0	19	Peak Hour	5	8	4	4	21

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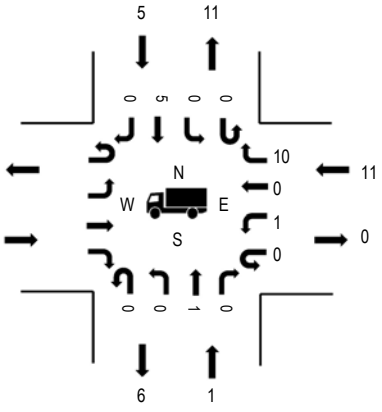
Location: 19 OAKES AVE & I90 WB OFFRAMP PM
Date: Sunday, August 18, 2019
Peak Hour: 03:30 PM - 04:30 PM

Peak Hour

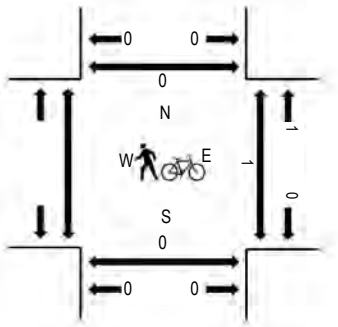
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB		
WB	2.6%	0.93
NB	4.5%	0.50
SB	3.2%	0.76
All	2.8%	0.88

Traffic Counts - All Vehicles

Interval Start Time	Eastbound				I90 WB OFFRAMP Westbound				OAKES AVE Northbound				OAKES AVE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM					0	1	0	27	0	0	2	0	0	0	40	0	70	519
3:15 PM					0	1	0	76	0	0	6	0	0	0	54	0	137	595
3:30 PM					0	1	0	106	0	0	11	0	0	0	52	0	170	600
3:45 PM					0	2	0	98	0	0	5	0	0	0	37	0	142	565
4:00 PM					0	0	0	113	0	0	2	0	0	0	31	0	146	568
4:15 PM					0	0	0	100	0	0	4	0	0	0	38	0	142	
4:30 PM					0	0	0	91	0	0	6	0	0	0	38	0	135	
4:45 PM					0	3	0	113	0	0	2	0	0	0	27	0	145	
Count Total					0	8	0	724	0	0	38	0	0	0	317	0	1,087	
Peak Hour					0	3	0	417	0	0	22	0	0	0	158	0	600	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

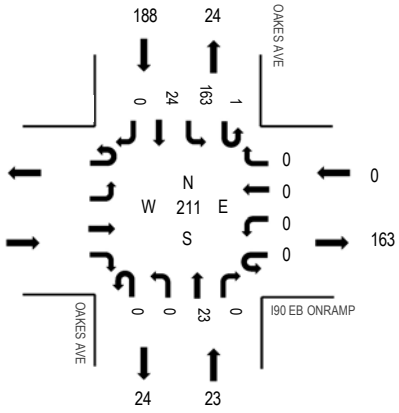
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM		0	1	0	1	3:00 PM		0	0	0	0
3:15 PM		0	1	0	1	3:15 PM		0	1	0	1
3:30 PM		1	2	1	4	3:30 PM		0	0	0	0
3:45 PM		0	3	2	5	3:45 PM		0	0	0	0
4:00 PM		0	2	1	3	4:00 PM		0	1	0	1
4:15 PM		0	4	1	5	4:15 PM		0	0	0	0
4:30 PM		0	3	3	6	4:30 PM		0	0	0	0
4:45 PM		0	2	1	3	4:45 PM		0	0	0	0
Count Total		1	18	9	28	Count Total		0	2	0	2
Peak Hour		1	11	5	17	Peak Hour		0	1	0	1

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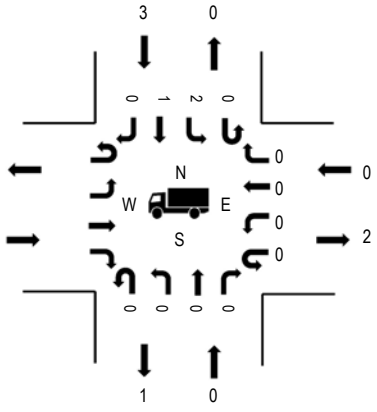
Location: 20 OAKES AVE & I90 EB ONRAMP PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

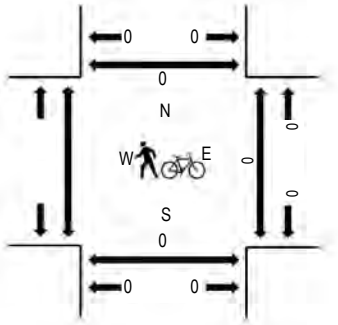
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB		
WB	0.0%	0.00
NB	0.0%	0.52
SB	1.6%	0.84
All	1.4%	0.82

Traffic Counts - All Vehicles

Interval Start Time	Eastbound				I90 EB ONRAMP Westbound				OAKES AVE Northbound				OAKES AVE Southbound					Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	Total	
3:00 PM					0	0	0	0	0	0	2	0	0	34	5	0	41	211
3:15 PM					0	0	0	0	0	0	6	0	0	48	8	0	62	203
3:30 PM					0	0	0	0	0	0	11	0	0	46	7	0	64	183
3:45 PM					0	0	0	0	0	0	4	0	1	35	4	0	44	166
4:00 PM					0	0	0	0	0	0	2	0	0	27	4	0	33	155
4:15 PM					0	0	0	0	0	0	4	1	0	34	3	0	42	
4:30 PM					0	0	0	0	0	0	8	0	1	36	2	0	47	
4:45 PM					0	0	0	0	0	0	3	0	1	24	5	0	33	
Count Total					0	0	0	0	0	0	40	1	3	284	38	0	366	
Peak Hour					0	0	0	0	0	0	23	0	1	163	24	0	211	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

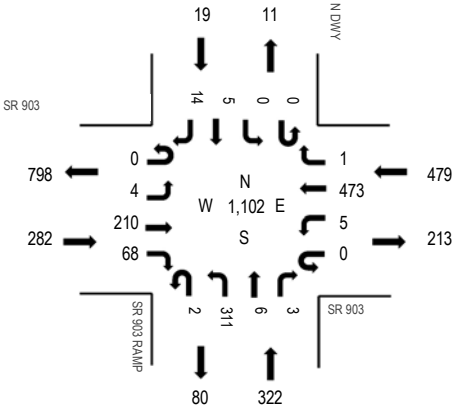
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM		0	0	0	0	3:00 PM		0	0	0	0
3:15 PM		0	0	0	0	3:15 PM		0	0	0	0
3:30 PM		0	0	2	2	3:30 PM		0	0	0	0
3:45 PM		0	0	1	1	3:45 PM		0	0	0	0
4:00 PM		0	0	1	1	4:00 PM		0	1	0	1
4:15 PM		0	0	1	1	4:15 PM		0	0	0	0
4:30 PM		0	0	2	2	4:30 PM		0	0	0	0
4:45 PM		0	0	1	1	4:45 PM		0	0	0	0
Count Total		0	0	8	8	Count Total		0	1	0	1
Peak Hour		0	0	3	3	Peak Hour		0	0	0	0

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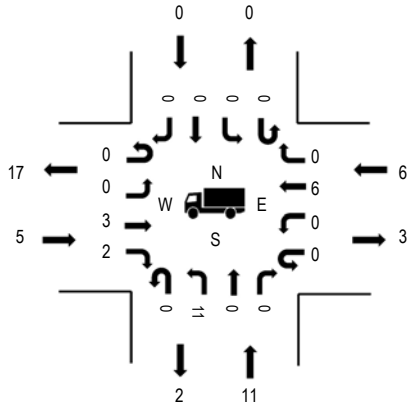
Location: 21 SR 903 RAMP & SR 903 PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

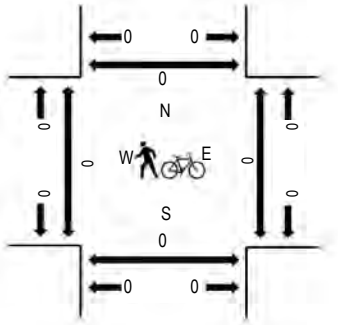
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.8%	0.82
WB	1.3%	0.92
NB	3.4%	0.74
SB	0.0%	0.68
All	2.0%	0.89

Traffic Counts - All Vehicles

Interval Start Time	SR 903 Eastbound				SR 903 Westbound				SR 903 RAMP Northbound				N DWY Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	3	47	12	0	0	130	0	0	107	2	0	0	0	2	5	308	1,102
3:15 PM	0	0	66	20	0	1	126	0	0	78	0	0	0	0	1	4	296	1,051
3:30 PM	0	1	53	17	0	0	118	1	0	64	1	2	0	0	1	1	259	968
3:45 PM	0	0	44	19	0	4	99	0	2	62	3	1	0	0	1	4	239	934
4:00 PM	0	0	48	22	0	0	133	0	0	50	0	1	0	2	0	1	257	887
4:15 PM	0	2	46	18	0	0	87	0	1	50	4	1	0	0	1	3	213	
4:30 PM	0	1	47	15	0	1	111	0	1	44	0	2	0	0	1	2	225	
4:45 PM	0	1	58	14	0	0	80	0	1	30	5	0	0	0	2	1	192	
Count Total	0	8	409	137	0	6	884	1	5	485	15	7	0	2	9	21	1,989	
Peak Hour	0	4	210	68	0	5	473	1	2	311	6	3	0	0	5	14	1,102	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

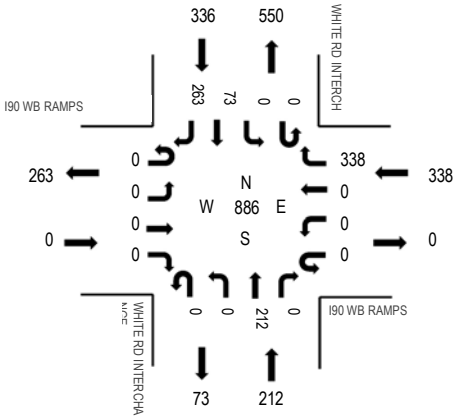
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1	4	2	0	7	3:00 PM	0	0	0	0	0
3:15 PM	1	4	0	0	5	3:15 PM	0	0	0	0	0
3:30 PM	0	3	2	0	5	3:30 PM	0	0	0	0	0
3:45 PM	3	0	2	0	5	3:45 PM	0	0	0	0	0
4:00 PM	1	1	0	0	2	4:00 PM	0	0	0	0	0
4:15 PM	2	1	1	0	4	4:15 PM	0	0	0	1	1
4:30 PM	1	2	3	0	6	4:30 PM	0	0	0	0	0
4:45 PM	1	1	2	0	4	4:45 PM	0	0	0	0	0
Count Total	10	16	12	0	38	Count Total	0	0	0	1	1
Peak Hour	5	11	6	0	22	Peak Hour	0	0	0	0	0

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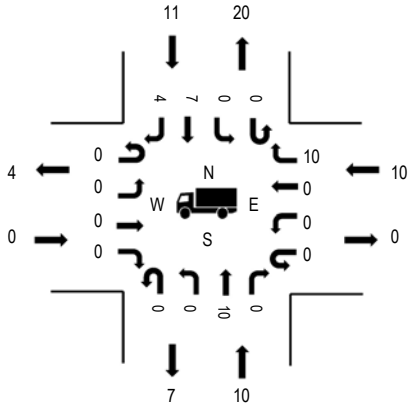
Location: 22 WHITE RD INTERCHANGE & I90 WB RAMPS PM
Date: Sunday, August 18, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

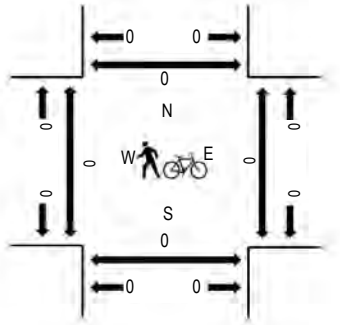
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.00
WB	3.0%	0.82
NB	4.7%	0.82
SB	3.3%	0.89
All	3.5%	0.88

Traffic Counts - All Vehicles

Interval Start Time	I90 WB RAMPS Eastbound				I90 WB RAMPS Westbound				WHITE RD INTERCHANGE Northbound				WHITE RD INTERCHANGE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	0	0	0	0	0	103	0	0	65	0	0	0	11	74	253	886
3:15 PM	0	0	0	0	0	0	0	71	0	0	58	0	0	0	23	71	223	855
3:30 PM	0	0	0	0	0	0	0	98	0	0	43	0	0	0	18	63	222	843
3:45 PM	0	0	0	0	0	0	0	66	0	0	46	0	0	0	21	55	188	808
4:00 PM	0	0	0	0	0	0	0	53	0	0	46	0	0	0	25	98	222	770
4:15 PM	0	0	0	0	0	0	0	50	0	0	60	0	0	0	22	79	211	
4:30 PM	0	0	0	0	0	0	0	44	0	0	44	0	0	0	14	85	187	
4:45 PM	0	0	0	0	0	0	0	30	0	0	40	0	0	0	14	66	150	
Count Total	0	0	0	0	0	0	0	515	0	0	402	0	0	0	148	591	1,656	
Peak Hour	0	0	0	0	0	0	0	338	0	0	212	0	0	0	73	263	886	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

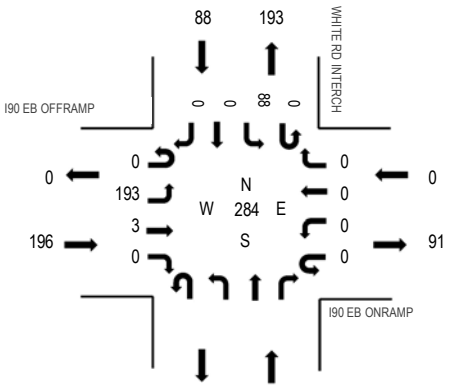
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	2	1	0	3	3:00 PM	0	0	0	0	0
3:15 PM	0	3	3	2	8	3:15 PM	0	0	0	0	0
3:30 PM	0	2	6	6	14	3:30 PM	0	0	0	0	0
3:45 PM	0	3	0	3	6	3:45 PM	0	0	0	0	0
4:00 PM	0	2	2	3	7	4:00 PM	0	0	0	0	0
4:15 PM	0	0	1	2	3	4:15 PM	0	0	0	0	0
4:30 PM	0	1	1	2	4	4:30 PM	0	0	0	0	0
4:45 PM	0	2	2	2	6	4:45 PM	0	0	0	0	0
Count Total	0	15	16	20	51	Count Total	0	0	0	0	0
Peak Hour	0	10	10	11	31	Peak Hour	0	0	0	0	0

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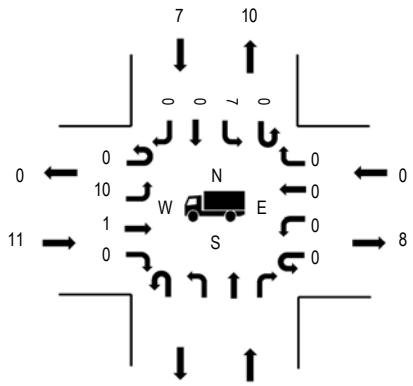
Location: 23 WHITE RD INTERCHANGE & I90 EB ONRAMP PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

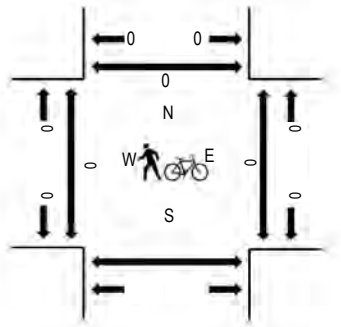
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	5.6%	0.80
WB	0.0%	0.00
NB		
SB	8.0%	0.88
All	6.3%	0.85

Traffic Counts - All Vehicles

Interval Start Time	I90 EB OFFRAMP Eastbound				I90 EB ONRAMP Westbound				Northbound				WHITE RD INTERCHANGE Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	44	1	0	0	0	0	0					2	10	0	0	57	268
3:15 PM	0	59	2	0	0	0	0	0					0	23	0	0	84	284
3:30 PM	0	42	0	0	0	0	0	0					0	19	0	0	61	282
3:45 PM	0	45	0	0	0	0	0	0					0	21	0	0	66	278
4:00 PM	0	47	1	0	0	0	0	0					0	25	0	0	73	267
4:15 PM	0	59	1	0	0	0	0	0					0	22	0	0	82	
4:30 PM	0	43	0	0	0	0	0	0					1	13	0	0	57	
4:45 PM	0	41	0	0	0	0	0	0					1	13	0	0	55	
Count Total	0	380	5	0	0	0	0	0					4	146	0	0	535	
Peak Hour	0	193	3	0	0	0	0	0					0	88	0	0	284	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

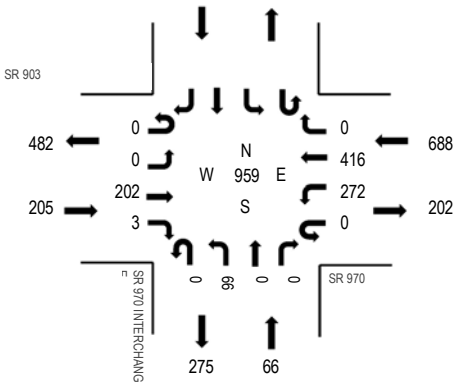
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	1		0	0	1	3:00 PM	0		0	0	0
3:15 PM	3		0	0	3	3:15 PM	0		0	0	0
3:30 PM	2		0	3	5	3:30 PM	0		0	0	0
3:45 PM	3		0	3	6	3:45 PM	0		0	0	0
4:00 PM	3		0	1	4	4:00 PM	0		0	0	0
4:15 PM	0		0	1	1	4:15 PM	0		0	0	0
4:30 PM	1		0	1	2	4:30 PM	0		0	0	0
4:45 PM	1		0	0	1	4:45 PM	0		0	0	0
Count Total	14		0	9	23	Count Total	0		0	0	0
Peak Hour	11		0	7	18	Peak Hour	0		0	0	0

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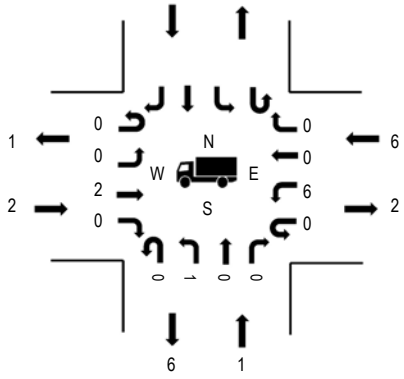
Location: 24 SR 970 INTERCHANGE & SR 970 PM
Date: Sunday, August 18, 2019
Peak Hour: 03:15 PM - 04:15 PM

Peak Hour

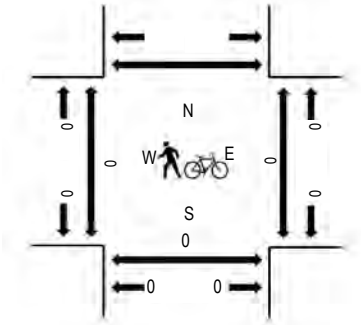
All Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	1.0%	0.80
WB	0.9%	0.79
NB	1.5%	0.63
SB		
All	0.9%	0.89

Traffic Counts - All Vehicles

Interval Start Time	SR 903 Eastbound				SR 970 Westbound				SR 970 INTERCHANGE Northbound				Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	48	0	0	73	107	0	0	27	0	0					255	944
3:15 PM	0	0	64	0	0	68	111	0	0	16	0	0					259	959
3:30 PM	0	0	54	0	0	61	95	0	0	26	0	0					236	915
3:45 PM	0	0	41	1	0	50	85	0	0	17	0	0					194	913
4:00 PM	0	0	43	2	0	93	125	0	0	7	0	0					270	917
4:15 PM	0	0	49	2	0	78	82	0	0	4	0	0					215	
4:30 PM	0	0	46	0	0	78	110	0	0	0	0	0					234	
4:45 PM	0	0	56	1	0	61	79	0	0	1	0	0					198	
Count Total	0	0	401	6	0	562	794	0	0	98	0	0					1,861	
Peak Hour	0	0	202	3	0	272	416	0	0	66	0	0					959	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles				
	EB	NB	WB	SB	Total
3:00 PM	1	0	2		3
3:15 PM	1	0	1		2
3:30 PM	0	0	3		3
3:45 PM	0	1	0		1
4:00 PM	1	0	2		3
4:15 PM	0	0	2		2
4:30 PM	0	0	4		4
4:45 PM	1	0	4		5
Count Total	4	1	18		23
Peak Hour	2	1	6		9

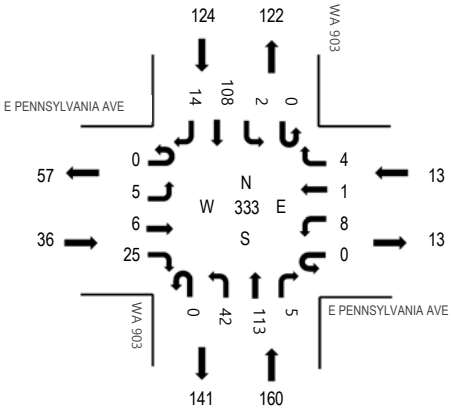
Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total
3:00 PM	0	0	0		0
3:15 PM	0	0	0		0
3:30 PM	0	0	0		0
3:45 PM	0	0	0		0
4:00 PM	0	0	0		0
4:15 PM	0	0	0		0
4:30 PM	0	0	0		0
4:45 PM	0	0	0		0
Count Total	0	0	0		0
Peak Hour	0	0	0		0

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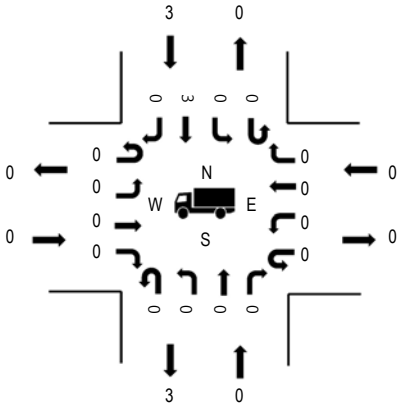
Location: 1 WA 903 & E PENNSYLVANIA AVE PM
Date: Sunday, December 8, 2019
Peak Hour: 03:00 PM - 04:00 PM

Peak Hour

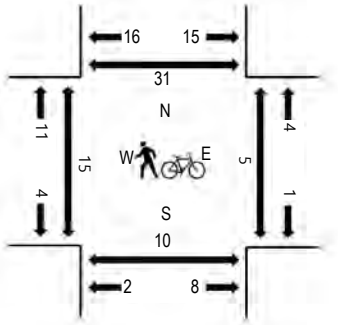
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.82
WB	0.0%	0.46
NB	0.0%	0.85
SB	2.4%	0.82
All	0.9%	0.94

Traffic Counts - Motorized Vehicles

Interval Start Time	E PENNSYLVANIA AVE Eastbound				E PENNSYLVANIA AVE Westbound				WA 903 Northbound				WA 903 Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	3	2	4	0	1	0	2	0	10	30	3	0	2	28	4	89	333
3:15 PM	0	0	3	8	0	4	1	2	0	10	20	0	0	0	35	3	86	317
3:30 PM	0	2	0	4	0	3	0	0	0	11	34	2	0	0	21	4	81	323
3:45 PM	0	0	1	9	0	0	0	0	0	11	29	0	0	0	24	3	77	308
4:00 PM	0	3	0	4	0	0	0	2	0	8	25	1	0	1	25	4	73	312
4:15 PM	0	2	2	14	0	1	1	0	0	9	28	2	0	1	27	5	92	
4:30 PM	0	0	1	7	0	1	0	1	0	2	26	3	1	0	23	1	66	
4:45 PM	0	0	3	9	0	6	0	0	0	7	20	4	0	1	28	3	81	
Count Total	0	10	12	59	0	16	2	7	0	68	212	15	1	5	211	27	645	
Peak Hour	0	5	6	25	0	8	1	4	0	42	113	5	0	2	108	14	333	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles				
	EB	NB	WB	SB	Total
3:00 PM	0	0	0	2	2
3:15 PM	0	0	0	1	1
3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	0	0
4:15 PM	0	1	0	1	2
4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0
Count Total	0	1	0	4	5
Peak Hour	0	0	0	3	3

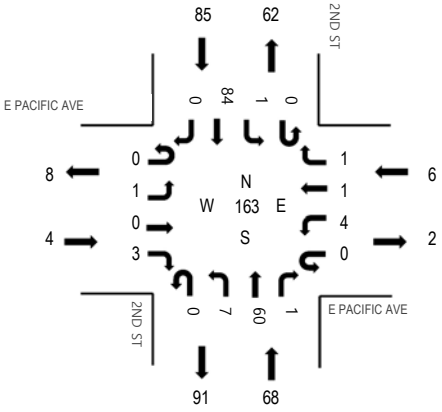
Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total
3:00 PM	5	7	0	6	18
3:15 PM	4	0	4	15	23
3:30 PM	2	3	1	3	9
3:45 PM	4	0	0	7	11
4:00 PM	3	1	3	1	8
4:15 PM	5	3	4	6	18
4:30 PM	0	0	2	5	7
4:45 PM	6	1	0	10	17
Count Total	29	15	14	53	111
Peak Hour	15	10	5	31	61

All Traffic Data Services Inc.
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www.alltrafficdata.net

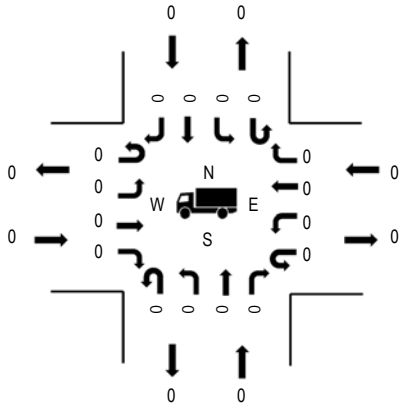
Location: 2 2ND ST & E PACIFIC AVE PM
Date: Sunday, December 8, 2019
Peak Hour: 03:45 PM - 04:45 PM

Peak Hour

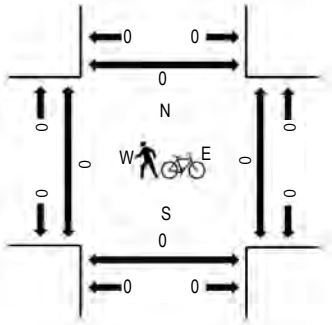
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.50
WB	0.0%	0.50
NB	0.0%	0.89
SB	0.0%	0.82
All	0.0%	0.93

Traffic Counts - Motorized Vehicles

Interval Start Time	E PACIFIC AVE Eastbound				E PACIFIC AVE Westbound				2ND ST Northbound				2ND ST Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	0	0	2	0	0	0	0	1	0	18	1	0	0	15	0	37	159
3:15 PM	0	0	0	1	0	0	0	0	0	1	20	1	0	0	28	0	51	159
3:30 PM	0	0	0	0	0	0	0	0	0	5	10	0	0	0	17	0	32	152
3:45 PM	0	0	0	1	0	0	1	0	0	0	19	0	0	0	18	0	39	163
4:00 PM	0	0	0	1	0	1	0	1	0	5	11	0	0	0	18	0	37	158
4:15 PM	0	1	0	1	0	0	0	0	0	0	18	1	0	0	23	0	44	
4:30 PM	0	0	0	0	0	3	0	0	0	2	12	0	0	1	25	0	43	
4:45 PM	0	0	1	1	0	0	1	0	0	1	12	2	0	1	15	0	34	
Count Total	0	1	1	7	0	4	2	1	1	14	120	5	0	2	159	0	317	
Peak Hour	0	1	0	3	0	4	1	1	0	7	60	1	0	1	84	0	163	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

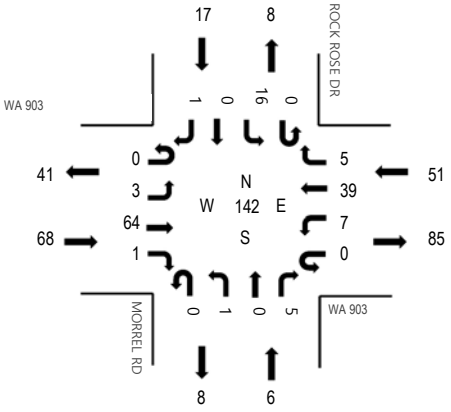
Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	0	0	0	0	3:00 PM	0	0	0	1	1
3:15 PM	0	0	0	0	0	3:15 PM	0	0	0	0	0
3:30 PM	0	0	0	0	0	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	0	0	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	0	0	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0	4:45 PM	0	0	0	0	0
Count Total	0	0	0	0	0	Count Total	0	0	0	1	1
Peak Hour	0	0	0	0	0	Peak Hour	0	0	0	0	0

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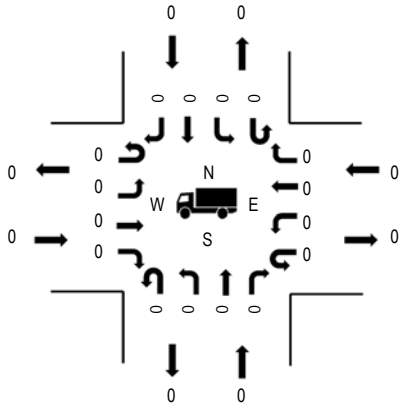
Location: 3 MORREL RD & WA 903 PM
Date: Sunday, December 8, 2019
Peak Hour: 03:45 PM - 04:45 PM

Peak Hour

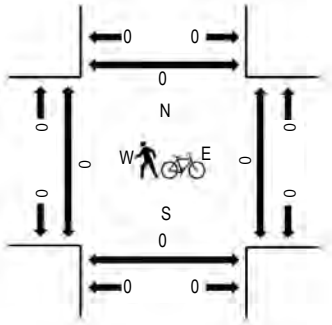
Motorized Vehicles



Heavy Vehicles



Pedestrians/Bicycles in Crosswalk



	HV%	PHF
EB	0.0%	0.85
WB	0.0%	0.91
NB	0.0%	0.75
SB	0.0%	0.85
All	0.0%	0.87

Traffic Counts - Motorized Vehicles

Interval Start Time	WA 903 Eastbound				WA 903 Westbound				MORREL RD Northbound				ROCK ROSE DR Southbound				Total	Rolling Hour
	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right	U-Turn	Left	Thru	Right		
3:00 PM	0	1	9	0	0	1	11	3	0	0	2	1	0	3	0	0	31	133
3:15 PM	0	0	19	0	0	4	10	3	0	1	0	2	0	2	1	0	42	134
3:30 PM	0	1	16	0	0	0	6	2	0	0	0	0	0	1	0	0	26	127
3:45 PM	0	1	16	0	0	1	10	0	0	1	0	1	0	4	0	0	34	142
4:00 PM	0	0	12	1	0	4	9	1	0	0	0	1	0	4	0	0	32	132
4:15 PM	0	0	18	0	0	1	8	3	0	0	0	1	0	3	0	1	35	
4:30 PM	0	2	18	0	0	1	12	1	0	0	0	2	0	5	0	0	41	
4:45 PM	0	2	9	1	0	1	7	0	0	0	0	2	0	2	0	0	24	
Count Total	0	7	117	2	0	13	73	13	0	2	2	10	0	24	1	1	265	
Peak Hour	0	3	64	1	0	7	39	5	0	1	0	5	0	16	0	1	142	

Traffic Counts - Heavy Vehicles and Pedestrians/Bicycles in Crosswalk

Interval Start Time	Heavy Vehicles					Interval Start Time	Pedestrians/Bicycles on Crosswalk				
	EB	NB	WB	SB	Total		EB	NB	WB	SB	Total
3:00 PM	0	0	0	0	0	3:00 PM	0	0	0	0	0
3:15 PM	0	0	0	0	0	3:15 PM	0	0	0	0	0
3:30 PM	0	0	0	0	0	3:30 PM	0	0	0	0	0
3:45 PM	0	0	0	0	0	3:45 PM	0	0	0	0	0
4:00 PM	0	0	0	0	0	4:00 PM	0	0	0	0	0
4:15 PM	0	0	0	0	0	4:15 PM	0	0	0	0	0
4:30 PM	0	0	0	0	0	4:30 PM	0	0	0	0	0
4:45 PM	0	0	0	0	0	4:45 PM	0	0	0	0	0
Count Total	0	0	0	0	0	Count Total	0	0	0	0	0
Peak Hour	0	0	0	0	0	Peak Hour	0	0	0	0	0

APPENDIX B

Weekday PM Peak Hour Trip Generation Summary and Calculations for SEIS Alternative 6 With 50% RV Occupancy

47 North
Current Land Use Plan (Alternative 6) - YEAR 2025 SCENARIO
Weekday PM Peak Hour Trip Generation Summary

Land Use	Units[1]	ITE LUC[2]	Directional Distribution[2] In	Directional Distribution[2] Out	Trip Rate or Equation[2]	Trips Generated In	Trips Generated Out	Trips Generated Total
WEEKDAY PM PEAK HOUR								
Proposed Use:								
Single-Family Detached Housing	264 DU	210	63%	37%	Ln(T) = 0.96Ln(X)+0.20	163	95	258
Internal Trips[3]	*5%*					*-9*	*-6*	*-15*
					Subtotal (less internal) =	154	89	243
Multifamily Housing (Low-Rise)	180 DU	220	63%	37%	Ln(T) = 0.89Ln(X)-0.02	63	37	100
Internal Trips[3]	*5%*					*-4*	*-2*	*-6*
					Subtotal (less internal) =	59	35	94
RV Park	314 occ. sites	416	65%	35%	0.27	55	30	85
Internal Trips[3]	*5%*					*-3*	*-2*	*-5*
					Subtotal (less internal) =	52	28	80
Retail	8,500 SF	820	48%	52%	Ln(T) = 0.74Ln(X)+2.89	42	46	88
Internal Trips[3]	*see above*					*-5*	*-11*	*-16*
Passby Trips[4]	*34%*					*-12*	*-12*	*-24*
					Subtotal (less internal and passby) =	25	23	48
Restaurant	6,500 SF	932	62%	38%	9.77	40	24	64
Internal Trips[3]	*see above*					*-5*	*-5*	*-10*
Passby Trips[4]	*43%*					*-14*	*-9*	*-23*
					Subtotal (less internal and passby) =	21	10	31
					Gross Proposed PM Peak Hour Trips =	**363**	**232**	**595**
					Less Total Internal Trips =	*-26*	*-26*	*-52*
					Less Total Pass-By Trips =	*-26*	*-21*	*-47*
					Net New PM Peak Hour Trips =	**311**	**185**	**496**

Notes:

[1] DU = Dwelling Units, Occ. Sites = Occupied Sites, SF = Square Feet.

[2] Institute of Transportation Engineers, Trip Generation Manual, 10th Edition.

[3] Internal trip reductions based on methodology documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

[4] Passby percent based on studies documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

NCHRP 8-51 Internal Trip Capture Estimation Tool			
Project Name:	47 North	**Organization:**	
Project Location:		**Performed By:**	TENW
Scenario Description:	Alternative 6	**Date:**	1/21/2020
Analysis Year:	2025 Weekday PM Peak	**Checked By:**	
Analysis Period:	**PM Street Peak Hour**	**Date:**	

Table 1-P: Base Vehicle-Trip Generation Estimates (Single-Use Site Estimate)

Land Use	Development Data (*For Information Only*)			Estimated Vehicle-Trips		
	ITE LUCs[1]	Quantity	Units	Total	Entering	Exiting
Office				0		
Retail	820	8,500	SF	88	42	46
Restaurant	932	6,500	SF	64	40	24
Cinema/Entertainment				0		
Residential	210/220/416	758	DU's	443	281	162
Hotel				0		
All Other Land Uses[2]				0		
Total				595	363	232

Table 2-P: Mode Split and Vehicle Occupancy Estimates

Land Use	Entering Trips			Exiting Trips		
	Veh. Occ.	% Transit	% Non-Motorized	Veh. Occ.	% Transit	% Non-Motorized
Office						
Retail						
Restaurant						
Cinema/Entertainment						
Residential						
Hotel						
All Other Land Uses[2]						

Table 3-P: Average Land Use Interchange Distances (Feet Walking Distance)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office						
Retail						
Restaurant						
Cinema/Entertainment						
Residential						
Hotel						

Table 4-P: Internal Person-Trip Origin-Destination Matrix*

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		0	0	0	0	0
Retail	0		12	0	12	0
Restaurant	0	10		0	4	0
Cinema/Entertainment	0	0	0		0	0
Residential	0	4	6	0		0
Hotel	0	0	0	0	0	

Table 5-P: Computations Summary

	Total	Entering	Exiting
All Person-Trips	595	363	232
Internal Capture Percentage	16%	13%	21%
External Vehicle-Trips[3]	499	315	184
External Transit-Trips[4]	0	0	0
External Non-Motorized Trips[4]	0	0	0

Table 6-P: Internal Trip Capture Percentages by Land Use

Land Use	Entering Trips	Exiting Trips
Office	N/A	N/A
Retail	33%	52%
Restaurant	45%	58%
Cinema/Entertainment	N/A	N/A
Residential	6%	6%
Hotel	N/A	N/A

[1]Land Use Codes (LUCs) from *Trip Generation Informational Report*, published by the Institute of Transportation Engineers.

[2]Total estimate for all other land uses at mixed-use development site-not subject to internal trip capture computations in this estimator

[3]Vehicle-trips computed using the mode split and vehicle occupancy values provided in Table 2-P

[4]Person-Trips

*Indicates computation that has been rounded to the nearest whole number.

Estimation Tool Developed by the Texas Transportation Institute

Project Name:	47 North
Analysis Period:	**PM Street Peak Hour**

Table 7-P: Conversion of Vehicle-Trip Ends to Person-Trip Ends

Land Use	Table 7-P (D): Entering Trips			Table 7-P (O): Exiting Trips		
	Veh. Occ.	Vehicle-Trips	Person-Trips*	Veh. Occ.	Vehicle-Trips	Person-Trips*
Office	1.00	0	0	1.00	0	0
Retail	1.00	42	42	1.00	46	46
Restaurant	1.00	40	40	1.00	24	24
Cinema/Entertainment	1.00	0	0	1.00	0	0
Residential	1.00	281	281	1.00	162	162
Hotel	1.00	0	0	1.00	0	0

Table 8-P (O): Internal Person-Trip Origin-Destination Matrix (Computed at Origin)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		0	0	0	0	0
Retail	1		13	2	12	2
Restaurant	1	10		2	4	2
Cinema/Entertainment	0	0	0		0	0
Residential	6	68	34	0		5
Hotel	0	0	0	0	0	

Table 8-P (D): Internal Person-Trip Origin-Destination Matrix (Computed at Destination)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		3	1	0	11	0
Retail	0		12	0	129	0
Restaurant	0	21		0	45	0
Cinema/Entertainment	0	2	1		11	0
Residential	0	4	6	0		0
Hotel	0	1	2	0	0	

Table 9-P (D): Internal and External Trips Summary (Entering Trips)

Destination Land Use	Person-Trip Estimates			External Trips by Mode*		
	Internal	External	Total	Vehicles[1]	Transit[2]	Non-Motorized[2]
Office	0	0	0	0	0	0
Retail	14	28	42	28	0	0
Restaurant	18	22	40	22	0	0
Cinema/Entertainment	0	0	0	0	0	0
Residential	16	265	281	265	0	0
Hotel	0	0	0	0	0	0
All Other Land Uses[3]	0	0	0	0	0	0

Table 9-P (O): Internal and External Trips Summary (Exiting Trips)

Origin Land Use	Person-Trip Estimates			External Trips by Mode*		
	Internal	External	Total	Vehicles[1]	Transit[2]	Non-Motorized[2]
Office	0	0	0	0	0	0
Retail	24	22	46	22	0	0
Restaurant	14	10	24	10	0	0
Cinema/Entertainment	0	0	0	0	0	0
Residential	10	152	162	152	0	0
Hotel	0	0	0	0	0	0
All Other Land Uses[3]	0	0	0	0	0	0

[1]Vehicle-trips computed using the mode split and vehicle occupancy values provided in Table 2-P

[2]Person-Trips

[3]Total estimate for all other land uses at mixed-use development site-not subject to internal trip capture computations in this estimator

*Indicates computation that has been rounded to the nearest whole number.

47 North
Current Land Use Plan (Alternative 6) - YEAR 2030 SCENARIO
Weekday PM Peak Hour Trip Generation Summary

Land Use	Units[1]	ITE LUC[2]	Directional Distribution[2] In	Directional Distribution[2] Out	Trip Rate or Equation[2]	Trips Generated In	Trips Generated Out	Trips Generated Total
WEEKDAY PM PEAK HOUR								
Proposed Use:								
Single-Family Detached Housing	527 DU	210	63%	37%	Ln(T) = 0.96Ln(X)+0.20	316	185	501
Internal Trips[3]						*-61*	*-30*	*-91*
					Subtotal (less internal) =	255	155	410
Multifamily Housing (Low-Rise)	180 DU	220	63%	37%	Ln(T) = 0.89Ln(X)-0.02	63	37	100
Internal Trips[3]						*-12*	*-6*	*-18*
					Subtotal (less internal) =	51	31	82
RV Park	314 occ. sites	416	65%	35%	0.27	55	30	85
Internal Trips[3]						*-11*	*-5*	*-16*
					Subtotal (less internal) =	44	25	69
Grocery	45,000 SF	850	51%	49%	Ln(T) = 0.75Ln(X)+3.21	220	211	431
Internal Trips[3]						*-24*	*-53*	*-77*
Passby Trips[4]	*36%*					*-65*	*-62*	*-127*
					Subtotal (less internal and passby) =	131	96	227
Retail	17,000 SF	820	48%	52%	Ln(T) = 0.74Ln(X)+2.89	70	76	146
Internal Trips[3]						*-7*	*-19*	*-26*
Passby Trips[4]	*34%*					*-20*	*-21*	*-41*
					Subtotal (less internal and passby) =	43	36	79
Restaurant	13,000 SF	932	62%	38%	9.77	79	48	127
Internal Trips[3]						*-9*	*-12*	*-21*
Passby Trips[4]	*43%*					*-29*	*-17*	*-46*
					Subtotal (less internal and passby) =	41	19	60
					Gross Proposed PM Peak Hour Trips =	**803**	**587**	**1,390**
					Less Total Internal Trips =	*-124*	*-125*	*-249*
					Less Total Pass-By Trips =	*-114*	*-100*	*-214*
					Net New PM Peak Hour Trips =	**565**	**362**	**927**

Notes:

[1] DU = Dwelling Units, Occ. Sites = Occupied Sites, SF = Square Feet.

[2] Institute of Transportation Engineers, Trip Generation Manual, 10th Edition.

[3] Internal trip reductions based on methodology documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

[4] Passby percent based on studies documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

NCHRP 8-51 Internal Trip Capture Estimation Tool			
Project Name:	47 North	**Organization:**	
Project Location:		**Performed By:**	TENW
Scenario Description:	Alternative 6	**Date:**	1/21/2020
Analysis Year:	2030 Weekday PM Peak	**Checked By:**	
Analysis Period:	**PM Street Peak Hour**	**Date:**	

Table 1-P: Base Vehicle-Trip Generation Estimates (Single-Use Site Estimate)

Land Use	Development Data (*For Information Only*)			Estimated Vehicle-Trips		
	ITE LUCs[1]	Quantity	Units	Total	Entering	Exiting
Office						
Retail	850/820	62,000	SF	577	290	287
Restaurant	932	13,000	SF	127	79	48
Cinema/Entertainment				0		
Residential	210/220/416	1,021	DU's	686	434	252
Hotel				0		
All Other Land Uses[2]				0		
Total				1390	803	587

Table 2-P: Mode Split and Vehicle Occupancy Estimates

Land Use	Entering Trips			Exiting Trips		
	Veh. Occ.	% Transit	% Non-Motorized	Veh. Occ.	% Transit	% Non-Motorized
Office						
Retail						
Restaurant						
Cinema/Entertainment						
Residential						
Hotel						
All Other Land Uses[2]						

Table 3-P: Average Land Use Interchange Distances (Feet Walking Distance)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office						
Retail						
Restaurant						
Cinema/Entertainment						
Residential						
Hotel						

Table 4-P: Internal Person-Trip Origin-Destination Matrix*

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		0	0	0	0	0
Retail	0		23	0	75	0
Restaurant	0	20		0	9	0
Cinema/Entertainment	0	0	0		0	0
Residential	0	29	11	0		0
Hotel	0	0	0	0	0	

Table 5-P: Computations Summary

	Total	Entering	Exiting
All Person-Trips	1,390	803	587
Internal Capture Percentage	24%	21%	28%
External Vehicle-Trips[3]	1,056	636	420
External Transit-Trips[4]	0	0	0
External Non-Motorized Trips[4]	0	0	0

Table 6-P: Internal Trip Capture Percentages by Land Use

Land Use	Entering Trips	Exiting Trips
Office	N/A	N/A
Retail	17%	34%
Restaurant	43%	60%
Cinema/Entertainment	N/A	N/A
Residential	19%	16%
Hotel	N/A	N/A

[1]Land Use Codes (LUCs) from *Trip Generation Informational Report*, published by the Institute of Transportation Engineers.

[2]Total estimate for all other land uses at mixed-use development site-not subject to internal trip capture computations in this estimator

[3]Vehicle-trips computed using the mode split and vehicle occupancy values provided in Table 2-P

[4]Person-Trips

*Indicates computation that has been rounded to the nearest whole number.

Estimation Tool Developed by the Texas Transportation Institute

Project Name:	47 North
Analysis Period:	**PM Street Peak Hour**

Table 7-P: Conversion of Vehicle-Trip Ends to Person-Trip Ends

Land Use	Table 7-P (D): Entering Trips			Table 7-P (O): Exiting Trips		
	Veh. Occ.	Vehicle-Trips	Person-Trips*	Veh. Occ.	Vehicle-Trips	Person-Trips*
Office	1.00	0	0	1.00	0	0
Retail	1.00	290	290	1.00	287	287
Restaurant	1.00	79	79	1.00	48	48
Cinema/Entertainment	1.00	0	0	1.00	0	0
Residential	1.00	434	434	1.00	252	252
Hotel	1.00	0	0	1.00	0	0

Table 8-P (O): Internal Person-Trip Origin-Destination Matrix (Computed at Origin)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		0	0	0	0	0
Retail	6		83	11	75	14
Restaurant	1	20		4	9	3
Cinema/Entertainment	0	0	0		0	0
Residential	10	106	53	0		8
Hotel	0	0	0	0	0	

Table 8-P (D): Internal Person-Trip Origin-Destination Matrix (Computed at Destination)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		23	2	0	17	0
Retail	0		23	0	200	0
Restaurant	0	145		0	69	0
Cinema/Entertainment	0	12	2		17	0
Residential	0	29	11	0		0
Hotel	0	6	4	0	0	

Table 9-P (D): Internal and External Trips Summary (Entering Trips)

Destination Land Use	Person-Trip Estimates			External Trips by Mode*		
	Internal	External	Total	Vehicles[1]	Transit[2]	Non-Motorized[2]
Office	0	0	0	0	0	0
Retail	49	241	290	241	0	0
Restaurant	34	45	79	45	0	0
Cinema/Entertainment	0	0	0	0	0	0
Residential	84	350	434	350	0	0
Hotel	0	0	0	0	0	0
All Other Land Uses[3]	0	0	0	0	0	0

Table 9-P (O): Internal and External Trips Summary (Exiting Trips)

Origin Land Use	Person-Trip Estimates			External Trips by Mode*		
	Internal	External	Total	Vehicles[1]	Transit[2]	Non-Motorized[2]
Office	0	0	0	0	0	0
Retail	98	189	287	189	0	0
Restaurant	29	19	48	19	0	0
Cinema/Entertainment	0	0	0	0	0	0
Residential	40	212	252	212	0	0
Hotel	0	0	0	0	0	0
All Other Land Uses[3]	0	0	0	0	0	0

[1]Vehicle-trips computed using the mode split and vehicle occupancy values provided in Table 2-P

[2]Person-Trips

[3]Total estimate for all other land uses at mixed-use development site-not subject to internal trip capture computations in this estimator

*Indicates computation that has been rounded to the nearest whole number.

47 North
Current Land Use Plan (Alternative 6) - YEAR 2037 SCENARIO
Weekday PM Peak Hour Trip Generation Summary

Land Use	Units[1]	ITE LUC[2]	Directional Distribution[2] In	Directional Distribution[2] Out	Trip Rate or Equation[2]	Trips Generated In	Trips Generated Out	Trips Generated Total
WEEKDAY PM PEAK HOUR								
Proposed Use:								
Single-Family Detached Housing	527 DU	210	63%	37%	Ln(T) = 0.96Ln(X)+0.20	316	185	501
Internal Trips[3]						*-71*	*-43*	*-114*
					Subtotal (less internal) =	245	142	387
Multifamily Housing (Low-Rise)	180 DU	220	63%	37%	Ln(T) = 0.89Ln(X)-0.02	63	37	100
Internal Trips[3]						*-14*	*-9*	*-23*
					Subtotal (less internal) =	49	28	77
RV Park	314 occ. sites	416	65%	35%	0.27	55	30	85
Internal Trips[3]						*-12*	*-7*	*-19*
					Subtotal (less internal) =	43	23	66
Grocery	45,000 SF	850	51%	49%	Ln(T) = 0.75Ln(X)+3.21	220	211	431
Internal Trips[3]						*-26*	*-38*	*-64*
Passby Trips[4]	*36%*					*-67*	*-65*	*-132*
					Subtotal (less internal and passby) =	127	108	235
Retail	25,000 SF	820	48%	52%	Ln(T) = 0.74Ln(X)+2.89	94	101	195
Internal Trips[3]						*-11*	*-18*	*-29*
Passby Trips[4]	*34%*					*-27*	*-29*	*-56*
					Subtotal (less internal and passby) =	56	54	110
Restaurant	20,000 SF	932	62%	38%	9.77	121	74	195
Internal Trips[3]						*-14*	*-13*	*-27*
Passby Trips[4]	*43%*					*-45*	*-27*	*-72*
					Subtotal (less internal and passby) =	62	34	96
Medical Office	60,000 SF	720	28%	72%	(T) = 3.39(X)+2.02	57	148	205
Internal Trips[3]						*-7*	*-27*	*-34*
					Subtotal (less internal) =	50	121	171
					Gross Proposed PM Peak Hour Trips =	**926**	**786**	**1,712**
					Less Total Internal Trips =	*-155*	*-155*	*-310*
					Less Total Pass-By Trips =	*-139*	*-121*	*-260*
					Net New PM Peak Hour Trips =	**632**	**510**	**1,142**

Notes:

[1] DU = Dwelling Units, Occ. Sites = Occupied Sites, SF = Square Feet.

[2] Institute of Transportation Engineers, Trip Generation Manual, 10th Edition.

[3] Internal trip reductions based on methodology documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

[4] Passby percent based on studies documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

NCHRP 8-51 Internal Trip Capture Estimation Tool			
Project Name:	47 North	**Organization:**	
Project Location:		**Performed By:**	TENW
Scenario Description:	Alternative 6	**Date:**	1/21/2020
Analysis Year:	2037 Weekday PM Peak	**Checked By:**	
Analysis Period:	**PM Street Peak Hour**	**Date:**	

Table 1-P: Base Vehicle-Trip Generation Estimates (Single-Use Site Estimate)

Land Use	Development Data (*For Information Only*)			Estimated Vehicle-Trips		
	ITE LUCs[1]	Quantity	Units	Total	Entering	Exiting
Office	720	60,000	SF	205	57	148
Retail	850/820	70,000	SF	626	314	312
Restaurant	932	20,000	SF	195	121	74
Cinema/Entertainment				0		
Residential	210/220/416	1,021	DU's	686	434	252
Hotel				0		
All Other Land Uses[2]				0		
Total				1712	926	786

Table 2-P: Mode Split and Vehicle Occupancy Estimates

Land Use	Entering Trips			Exiting Trips		
	Veh. Occ.	% Transit	% Non-Motorized	Veh. Occ.	% Transit	% Non-Motorized
Office						
Retail						
Restaurant						
Cinema/Entertainment						
Residential						
Hotel						
All Other Land Uses[2]						

Table 3-P: Average Land Use Interchange Distances (Feet Walking Distance)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office						
Retail						
Restaurant						
Cinema/Entertainment						
Residential						
Hotel						

Table 4-P: Internal Person-Trip Origin-Destination Matrix*

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		25	2	0	3	0
Retail	6		35	0	81	0
Restaurant	2	30		0	13	0
Cinema/Entertainment	0	0	0		0	0
Residential	10	31	17	0		0
Hotel	0	0	0	0	0	

Table 5-P: Computations Summary

	Total	Entering	Exiting
All Person-Trips	1,712	926	786
Internal Capture Percentage	30%	28%	32%
External Vehicle-Trips[3]	1,202	671	531
External Transit-Trips[4]	0	0	0
External Non-Motorized Trips[4]	0	0	0

Table 6-P: Internal Trip Capture Percentages by Land Use

Land Use	Entering Trips	Exiting Trips
Office	32%	20%
Retail	27%	39%
Restaurant	45%	61%
Cinema/Entertainment	N/A	N/A
Residential	22%	23%
Hotel	N/A	N/A

[1]Land Use Codes (LUCs) from *Trip Generation Informational Report*, published by the Institute of Transportation Engineers.

[2]Total estimate for all other land uses at mixed-use development site-not subject to internal trip capture computations in this estimator

[3]Vehicle-trips computed using the mode split and vehicle occupancy values provided in Table 2-P

[4]Person-Trips

*Indicates computation that has been rounded to the nearest whole number.

Estimation Tool Developed by the Texas Transportation Institute

Project Name:	47 North
Analysis Period:	**PM Street Peak Hour**

Table 7-P: Conversion of Vehicle-Trip Ends to Person-Trip Ends

Land Use	Table 7-P (D): Entering Trips			Table 7-P (O): Exiting Trips		
	Veh. Occ.	Vehicle-Trips	Person-Trips*	Veh. Occ.	Vehicle-Trips	Person-Trips*
Office	1.00	57	57	1.00	148	148
Retail	1.00	314	314	1.00	312	312
Restaurant	1.00	121	121	1.00	74	74
Cinema/Entertainment	1.00	0	0	1.00	0	0
Residential	1.00	434	434	1.00	252	252
Hotel	1.00	0	0	1.00	0	0

Table 8-P (O): Internal Person-Trip Origin-Destination Matrix (Computed at Origin)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		30	6	0	3	0
Retail	6		90	12	81	16
Restaurant	2	30		6	13	5
Cinema/Entertainment	0	0	0		0	0
Residential	10	106	53	0		8
Hotel	0	0	0	0	0	

Table 8-P (D): Internal Person-Trip Origin-Destination Matrix (Computed at Destination)

Origin (From)	Destination (To)					
	Office	Retail	Restaurant	Cinema/Entertainment	Residential	Hotel
Office		25	2	0	17	0
Retail	18		35	0	200	0
Restaurant	17	157		0	69	0
Cinema/Entertainment	3	13	4		17	0
Residential	32	31	17	0		0
Hotel	0	6	6	0	0	

Table 9-P (D): Internal and External Trips Summary (Entering Trips)

Destination Land Use	Person-Trip Estimates			External Trips by Mode*		
	Internal	External	Total	Vehicles[1]	Transit[2]	Non-Motorized[2]
Office	18	39	57	39	0	0
Retail	86	228	314	228	0	0
Restaurant	54	67	121	67	0	0
Cinema/Entertainment	0	0	0	0	0	0
Residential	97	337	434	337	0	0
Hotel	0	0	0	0	0	0
All Other Land Uses[3]	0	0	0	0	0	0

Table 9-P (O): Internal and External Trips Summary (Exiting Trips)

Origin Land Use	Person-Trip Estimates			External Trips by Mode*		
	Internal	External	Total	Vehicles[1]	Transit[2]	Non-Motorized[2]
Office	30	118	148	118	0	0
Retail	122	190	312	190	0	0
Restaurant	45	29	74	29	0	0
Cinema/Entertainment	0	0	0	0	0	0
Residential	58	194	252	194	0	0
Hotel	0	0	0	0	0	0
All Other Land Uses[3]	0	0	0	0	0	0

[1]Vehicle-trips computed using the mode split and vehicle occupancy values provided in Table 2-P

[2]Person-Trips

[3]Total estimate for all other land uses at mixed-use development site-not subject to internal trip capture computations in this estimator

*Indicates computation that has been rounded to the nearest whole number.

47 North
Current Land Use Plan (Alternative 6) - YEAR 2025 SCENARIO
Sunday Peak Hour Trip Generation Summary

Land Use	Units[1]	ITE LUC[2]	Directional Distribution[2] In	Directional Distribution[2] Out	Trip Rate or Equation[2]	Trips Generated In	Trips Generated Out	Trips Generated Total
SUNDAY PEAK HOUR								
Proposed Use:								
Single-Family Detached Housing	264 DU	210	53%	47%	(T) = 0.79(X)+11.02	117	103	220
Internal Trips[3]	*5%*					-6	-5	-11
					Subtotal (less internal) =	111	98	209
Multifamily Housing (Low-Rise)	180 DU	220	50%	50%	0.67	60	61	121
Internal Trips[3]	*5%*					-3	-3	-6
					Subtotal (less internal) =	57	58	115
RV Park[5]	314 occ. sites	416	50%	50%	0.27	42	43	85
Internal Trips[3]	*5%*					-2	-2	-4
					Subtotal (less internal) =	40	41	81
Retail	8,500 SF	820	49%	51%	2.79	12	12	24
Internal Trips[3]	*from above*					-4	-5	-9
Passby Trips[4]	*34%*					-2	-3	-5
					Subtotal (less internal and passby) =	6	4	10
Restaurant [6]	6,500 SF	932	55%	45%	5.42	19	16	35
Internal Trips[3]	*from above*					-6	-6	-12
Passby Trips[4]	*43%*					-5	-5	-10
					Subtotal (less internal and passby) =	8	5	13
					Gross Proposed Sunday Peak Hour Trips =	**250**	**235**	**485**
					Less Total Internal Trips =	*-21*	*-21*	*-42*
					Less Total Pass-By Trips =	*-7*	*-8*	*-15*
					Net New Sunday Peak Hour Trips =	**222**	**206**	**428**

Notes:

[1] DU = Dwelling Units, Occ. Sites = Occupied Sites, SF = Square Feet.

[2] Institute of Transportation Engineers, Trip Generation Manual, 10th Edition.

[3] Internal trip reductions based on methodology documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

[4] Passby percent based on studies documented in the ITE Trip Generation Handbook, 3rd Edition, 2017. Sunday peak hour pass-by rates assumed to be equal to weekday PM peak h

[5] There are no Sunday trip rates for an RV park. Therefore, the Sunday trip rates and directional distribution were assumed to be equal to the Weekday trip rates.

[6] Sunday peak hour trip rate for restaurant based on hourly distribution data in ITE Trip Generation Handbook, 3rd Edition, 2017.

47 North
Current Land Use Plan (Alternative 6) - YEAR 2030 SCENARIO
Sunday Peak Hour Trip Generation Summary

Land Use	Units[1]	ITE LUC[2]	Directional Distribution[2] In	Directional Distribution[2] Out	Trip Rate or Equation[2]	Trips Generated In	Trips Generated Out	Trips Generated Total
SUNDAY PEAK HOUR								
Proposed Use:								
Single-Family Detached Housing	527 DU	210	53%	47%	(T) = 0.79(X)+11.02	226	201	427
Internal Trips[3]	*18%*					*-41*	-36	*-77*
					Subtotal (less internal) =	185	165	350
Multifamily Housing (Low-Rise)	180 DU	220	50%	50%	0.67	60	61	121
Internal Trips[3]	*18%*					*-11*	*-11*	*-22*
					Subtotal (less internal) =	49	50	99
RV Park[5]	314 occ. sites	416	50%	50%	0.27	42	43	85
Internal Trips[3]	*18%*					*-8*	*-7*	*-15*
					Subtotal (less internal) =	34	36	70
Grocery [6]	45,000 SF	850	50%	50%	13.98	314	315	629
Internal Trips[3]	*from above*					*-45*	*-51*	-96
Passby Trips[4]	*36%*					-96	-96	*-192*
					Subtotal (less internal and passby) =	173	168	341
Retail	17,000 SF	820	49%	51%	2.79	23	24	47
Internal Trips[3]	*from above*					*-3*	*-4*	*-7*
Passby Trips[4]	*34%*					*-7*	*-7*	*-14*
					Subtotal (less internal and passby) =	13	13	26
Restaurant [6]	13,000 SF	932	55%	45%	5.42	38	32	70
Internal Trips[3]	*from above*					*-5*	*-5*	*-10*
Passby Trips[4]	*43%*					*-14*	*-12*	*-26*
					Subtotal (less internal and passby) =	19	15	34
					Gross Proposed Sunday Peak Hour Trips =	**703**	**676**	**1,379**
					Less Total Internal Trips =	*-113*	*-114*	*-227*
					Less Total Pass-By Trips =	*-117*	*-115*	*-232*
					Net New Sunday Peak Hour Trips =	**473**	**447**	**920**

Notes:

[1] DU = Dwelling Units, Occ. Sites = Occupied Sites, SF = Square Feet.

[2] Institute of Transportation Engineers, Trip Generation Manual, 10th Edition.

[3] Internal trip reductions based on methodology documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

[4] Passby percent based on studies documented in the ITE Trip Generation Handbook, 3rd Edition, 2017. Sunday peak hour pass-by rates assumed to be equal to weekday PM peak h

[5] There are no Sunday trip rates for an RV park. Therefore, the Sunday trip rates and directional distribution were assumed to be equal to the Weekday trip rates.

[6] Sunday peak hour trip rate for grocery and restaurant based on hourly distribution data in ITE Trip Generation Handbook, 3rd Edition, 2017.

47 North
Current Land Use Plan (Alternative 6) - YEAR 2037 SCENARIO
Sunday Peak Hour Trip Generation Summary

Land Use	Units[1]	ITE LUC[2]	Directional Distribution[2] In	Directional Distribution[2] Out	Trip Rate or Equation[2]	Trips Generated In	Trips Generated Out	Trips Generated Total
SUNDAY PEAK HOUR								
Proposed Use:								
Single-Family Detached Housing	527 DU	210	53%	47%	(T) = 0.79(X)+11.02	226	201	427
Internal Trips[3]	*23%*					*-52*	*-46*	*-98*
					Subtotal (less internal) =	174	155	329
Multifamily Housing (Low-Rise)	180 DU	220	50%	50%	0.67	60	61	121
Internal Trips[3]	*23%*					*-14*	*-14*	*-28*
					Subtotal (less internal) =	46	47	93
RV Park[5]	314 occ. sites	416	50%	50%	0.27	42	43	85
Internal Trips[3]	*23%*					*-10*	*-10*	*-20*
					Subtotal (less internal) =	32	33	65
Grocery[6]	45,000 SF	850	50%	50%	13.98	314	315	629
Internal Trips[3]	*from above*					*-52*	*-58*	*-110*
Passby Trips[4]	*36%*					*-93*	*-94*	*-187*
					Subtotal (less internal and passby) =	169	163	332
Retail	25,000 SF	820	49%	51%	2.79	34	36	70
Internal Trips[3]	*from above*					*-6*	*-7*	*-13*
Passby Trips[4]	*34%*					*-9*	*-10*	*-19*
					Subtotal (less internal and passby) =	19	19	38
Restaurant[6]	20,000 SF	932	55%	45%	5.42	*59*	49	108
Internal Trips[3]	*from above*					*-10*	*-9*	*-19*
Passby Trips[4]	*43%*					*-21*	*-17*	*-38*
					Subtotal (less internal and passby) =	28	23	51
Medical Office	60,000 SF	720	52%	48%	0.32	10	9	19
Internal Trips[3]	*from above*					*-2*	*-2*	*-4*
					Subtotal (less internal) =	8	7	15
					Gross Proposed Sunday Peak Hour Trips =	**745**	**714**	**1,459**
					Less Total Internal Trips =	*-146*	*-146*	*-292*
					Less Total Pass-By Trips =	*-123*	*-121*	*-244*
					Net New Sunday Peak Hour Trips =	**476**	**447**	**923**

Notes:

[1] DU = Dwelling Units, Occ. Sites = Occupied Sites, SF = Square Feet.

[2] Institute of Transportation Engineers, Trip Generation Manual, 10th Edition.

[3] Internal trip reductions based on methodology documented in the ITE Trip Generation Handbook, 3rd Edition, 2017.

[4] Passby percent based on studies documented in the ITE Trip Generation Handbook, 3rd Edition, 2017. Sunday peak hour pass-by rates assumed to be equal to weekday PM peak h

[5] There are no Sunday trip rates for an RV park. Therefore, the Sunday trip rates and directional distribution were assumed to be equal to the Weekday trip rates.

[6] Sunday peak hour trip rate for grocery and restaurant based on hourly distribution data in ITE Trip Generation Handbook, 3rd Edition, 2017.

APPENDIX C

Detailed Pro-Rata Share Calculations – Method A and Method B

WEEKDAY PM PEAK HOUR PRO-RATA CALCULATIONS - METHOD A

Assumes 50% RV occupancy

#	Intersection	Year/Scenario Improvement is Needed (based on 100% RV occupancy)	Existing (2019) Traffic Volumes	Year 2025						Year 2031						Year 2037					
					SEIS Alternative 6						SEIS Alternative 6						SEIS Alternative 6				
				Baseline Traffic Volumes	SEIS Alt 6 Project Trips (50% RV occupancy)	Traffic Volumes with SEIS Alt 6	SEIS Alt 6 Pro-Rata Share	47 North Share (84%)	Commercial Share (16%)	Baseline Traffic Volumes	SEIS Alt 6 Project Trips (50% RV occupancy)	Traffic Volumes with SEIS Alt 6	SEIS Alt 6 Pro-Rata Share	47 North Share (61%)	Commercial Share (39%)	Baseline Traffic Volumes	SEIS Alt 6 Project Trips (50% RV occupancy)	Traffic Volumes with SEIS Alt 6	SEIS Alt 6 Pro-Rata Share	47 North Share (46%)	Commercial Share (54%)
1	Bullfrog Rd / I 90 EB Ramps	2031 Alt 6	244	375						485	116	357	100.0%	61.0%	39.0%						
2	Bullfrog Rd / I 90 WB Ramps	2037 Alt 5 & Alt 6	346	605												1,165	219	1,038	100.0%	0.0%	100.0%
3	Tumble Creek Dr / Bullfrog Rd	2037 Alt 5 & Alt 6	382	630												1,220	245	1,083	100.0%	0.0%	100.0%
7	Denny Ave / W Second St (SR 903)	2031 Alt 5 & Alt 6	695	1000						1190	533	1028	100.0%	61.0%	39.0%						
8	Ranger Station Rd / Miller Ave / W Second St (SR 90	2025 baseline	741	1110	312	681	45.8%	38.5%	7.3%												
9	N Pine St / W Second St (SR 903)	2025 Alt 5 & Alt 6	613	990	270	647	100.0%	84.0%	16.0%												
11	Douglas Munro Blvd / W First St	2025 baseline	1022	1185	36	199	18.1%	15.2%	2.9%												
12	Pine St / W First St	2025 baseline	1001	1085	29	113	25.7%	21.6%	4.1%												
13	N Stafford Ave / W Second St (SR 903)	2025 baseline	667	1080	234	647	36.2%	30.4%	5.8%												
15	N Oakes Ave / W Second St	2025 baseline	512	870	153	511	29.9%	25.1%	4.8%												
21	SR 903 / Pennsylvania Ave	2031 Alt 5 & Alt 6	711	910						1030	110	429	100.0%	61.0%	39.0%						

WEEKDAY PM PEAK HOUR PRO-RATA CALCULATIONS - METHOD B

Assumes 50% RV occupancy

#	Intersection	Year/Scenario Improvement is Needed (based on 100% RV occupancy)	EXISTING (2019)	Year 2025						Year 2031						Year 2037					
					SEIS Alternative 6						SEIS Alternative 6						SEIS Alternative 6				
				Baseline Traffic Volumes	SEIS Alt 6 Project Trips (50% RV occupancy)	Traffic Volumes with SEIS Alt 6	SEIS Alt 6 Pro-Rata Share	47 North Share (84%)	Commercial Share (16%)	Baseline Traffic Volumes	SEIS Alt 6 Project Trips (50% RV occupancy)	Traffic Volumes with SEIS Alt 6	SEIS Alt 6 Pro-Rata Share	47 North Share (61%)	Commercial Share (39%)	Baseline Traffic Volumes	SEIS Alt 6 Project Trips (50% RV occupancy)	Traffic Volumes with SEIS Alt 6	SEIS Alt 6 Pro-Rata Share	47 North Share (46%)	Commercial Share (54%)
1	Bullfrog Rd / I 90 EB Ramps	2031 Alt 6	244	375						485	116	357	32.5%	19.8%	12.7%						
2	Bullfrog Rd / I 90 WB Ramps	2037 Alt 5 & Alt 6	346	605												1,165	219	1,038	21.1%	9.7%	11.4%
3	Tumble Creek Dr / Bullfrog Rd	2037 Alt 5 & Alt 6	382	630												1,220	245	1,083	22.6%	10.4%	12.2%
7	Denny Ave / W Second St (SR 903)	2031 Alt 5 & Alt 6	695	1000						1190	533	1028	51.8%	31.6%	20.2%						
8	Ranger Station Rd / Miller Ave / W Second St (SR 9	2025 Baseline	741	1110	312	681	45.8%	38.5%	7.3%												
9	N Pine St / W Second St (SR 903)	2025 Alt 5 & Alt 6	613	990	270	647	41.7%	35.0%	6.7%												
11	Douglas Munro Blvd / W First St	2025 baseline	1022	1185	36	199	18.1%	15.2%	2.9%												
12	Pine St / W First St	2025 baseline	1001	1085	29	113	25.7%	21.6%	4.1%												
13	N Stafford Ave / W Second St (SR 903)	2025 baseline	667	1080	234	647	36.2%	30.4%	5.8%												
15	N Oakes Ave / W Second St	2025 baseline	512	870	153	511	29.9%	25.1%	4.8%												
21	SR 903 / Pennsylvania Ave	2031 Alt 5 & Alt 6	711	910						1030	110	429	25.6%	15.6%	10.0%						

Appendix B

UPDATED CULTURAL RESOURCES REPORT

CULTURAL RESOURCES TECHNICAL REPORT FOR THE 47° NORTH PROJECT MASTER SITE PLAN FINAL SEIS, CLE ELUM, KITTITAS COUNTY, WASHINGTON

BY

NICOLE CLENNON, PROJECT ARCHAEOLOGIST
MARGARET BERGER, PRINCIPAL INVESTIGATOR

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CRC PROJECT #1910A

SEPTEMBER 16, 2020
REVISED JANUARY 20, 2021

Cultural Resource Consultants

CULTURAL RESOURCES REPORT COVER SHEET

Author: Nicole Clennon and Margaret Berger

Title of Report: Cultural Resources Technical Report for the 47º North Project Master Site Plan Final SEIS, Cle Elum, Kittitas County, Washington

Date of Report: September 16, 2020; revised January 20, 2021

County(ies): Kittitas Section: 21, 27, 28, 29, 30, 31, 32
Township: 20 N Range: 15 E

Quad: Cle Elum, WA; Ronald, WA Acres: approximately 824

PDF of report submitted (REQUIRED) ☐ Yes

Historic Property Inventory Forms to be Approved Online? ☐ Yes ☒ No

Archaeological Site(s)/Isolate(s) Found or Amended? ☒ Yes ☐ No

TCP(s) found? ☐ Yes ☒ No

Replace a draft? ☐ Yes ☒ No

Satisfy a DAHP Archaeological Excavation Permit requirement? ☐ Yes # ☒ No

Were Human Remains Found? ☐ Yes DAHP Case # ☒ No

DAHP Archaeological Site #:
45KT1019
45KT1227
45KT1368
45KT1376
45KT1484
45KT2092
45KT2096
45KT2098
45KT2099
45KT2139
45KT2140
45KT2141
45KT2146
45KT3331
45KT3332

- Submission of PDFs is required.
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Cultural Resources Technical Report for the
47º North Project Master Site Plan Final SEIS,
Cle Elum, Kittitas County, Washington

Table of Contents

Management Summary 1
1.0 Administrative Data 1
1.1 Overview 1
1.2 Project Description 2
2.0 Methodology and Regulations 5
2.1 2002 Cle Elum EIS Methodology and Regulations 5
2.2 2020 SEIS Methodology and Regulations 6
3.0 Affected Environment 6
3.1 2002 Cle Elum EIS Affected Environment 6
3.2 2020 SEIS Affected Environment 7
3.2.1 Overview 7
3.2.2 Environmental Context 7
3.2.3 Archaeological Context 9
3.2.4 Ethnographic Context 10
3.2.5 Historic Context 11
3.2.6 Historical Records Search 12
3.2.7 Cultural Resources Database Review 13
3.3 Archaeological Expectations 20
3.3.1 Archaeological Predictive Model 20
3.3.2 Archaeological Expectations 20
3.4 Field Investigations 21
3.4.1 Archaeological Monitoring 21
3.5 Results and Recommendations 22
3.5.1 Investigation Results 22
4.0 Impacts of the Alternatives 34
4.1 2002 Cle Elum FEIS Impacts 34
4.2 2020 SEIS Impacts 34
5.0 Conclusions 35
6.0 Mitigation Measures 38
7.0 Limitations of this Assessment 39
8.0 References 39
Attachment A. Project Correspondence Between CRC and Yakama Nation. 48
Attachment B. Archaeological Monitoring Logs. 49
Attachment C. State of Washington Archaeological Site Inventory Form Updates, 45KT2092 and 45KT2098 69
Attachment D. Archaeological Shovel Probe Investigations 70
Attachment E. Inadvertent discovery protocol. 73

Management Summary

This report supports the Final Supplemental Environmental Impact Statement (FSEIS) for the 47º North Project in City of Cle Elum, Kittitas County, Washington. EA Engineering, Science, and Technology, Inc., requested that Cultural Resource Consultants, LLC (CRC) prepare this cultural resources analysis to evaluate potential impacts to cultural resources from two SEIS alternatives: SEIS Alternative 6 (Proposed 47° North Master Site Plan Amendment), and SEIS Alternative 5 the No Action Alternative (Approved Bullfrog Flats Master Site Plan). Methodology and regulations, affected environment, and impacts of the SEIS alternatives have been analyzed and compared to those under FEIS Alternative 5 (Original Bullfrog Flats Master Site Plan, as outlined in the 2002 Cle Elum UGA FEIS).

In 2002, archaeologists identified 23 cultural resources within the approximately 1,000-acre Bullfrog Flats project site. At that time, impacts specific to each cultural resource site individually were not identified. However, a number of mitigation measurements were recommended if the project were to proceed. Background research and field investigations conducted by Cultural Resource Consultants, LLC (CRC) resulted in the identification of 15 previously recorded precontact or historic-era archaeological sites within the 824-acre portion of the Bullfrog Flats site currently proposed for development and adjacent 25-acre property contemplated for future development. Seven of these sites are located in or near proposed ground disturbances. One of these sites was previously determined eligible for the National Register, however no evidence of the site remains. Field investigations did not identify any as yet unrecorded historic-era or precontact cultural resources within the project site and adjacent property, nor was there any evidence found to suggest a high potential for as-yet unrecorded archaeological deposits to be contained within areas proposed for development. No significant impacts on cultural resources have been identified for either SEIS Alternative 5 or SEIS Alternative 6. In the event that the project encounters as-yet unknown cultural resources, potential mitigation measures are discussed and an inadvertent discovery protocol is provided.

1.0 Administrative Data

1.1 Overview

Report Title: Cultural Resources Technical Report for the 47º North Project Master Site Plan Final SEIS, Kittitas County, Washington

Author (s): Nicole Clennon and Margaret Berger

Report Date: September 16, 2020; revised January 20, 2021

Location: This project is located in the western portion of the City of Cle Elum.

Legal Description: The legal description for the project is in Section 21, 27, 28, 29, 30, 31, and 32 Township 20 North, Range 15 East, W.M.

USGS 7.5' Topographic Map(s): Cle Elum, WA; Ronald, WA; Wenatchee, WA (Figure 1).

Total Area Involved: approximately 849 acres (824-acre 47° North site + adjacent 25-acre property).

Regulatory Nexus: State Environmental Policy Act (SEPA)

1.2 Project Description

Sun Communities plans to create a mixed use development including residential (single family, multi-family, and RV resort), commercial, and recreational uses. The approximately 824-acre project site is located outside in the western portion of the City of Cle Elum, south of Bullfrog Road and north of Interstate 90. In 2002, the Cle Elum UGA EIS was issued. Subsequently, the Bullfrog Flats Master Site Plan was approved, and Subarea Plan, Zoning, and Development Agreement adopted; the 1,100-acre Bullfrog Flats site was subsequently annexed to the City of Cle Elum. Sun Communities is proposing revisions to the Bullfrog Flats Master Site Plan on an 824-acre portion of the site now called 47° North; and, commercial development is contemplated by Suncadia in the future on an adjacent 25-acre property. Some of these revisions constitute Major Modifications to the approved Master Plan. As a result, the City of Cle Elum has determined that a SEIS is required, supplementing the 2002 Cle Elum UGA EIS. This report compares the methodology and regulations utilized, affected environment, and potential impacts of the 2002 UGA Cle Elum FEIS Alternative 5 (Original Bullfrog Flats Master Site Plan) and the 2020 SEIS project alternatives. The SEIS alternatives under analysis in this assessment are SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment; and the SEIS Alternative 5 (No Action Alternative) – Approved Bullfrog Flats Master Site Plan.

For purposes of this report, the area of interest (hereafter, “the project location”) for cultural resources is considered to contain the locations of all project elements as described above and as shown in Figures 1 and 2.

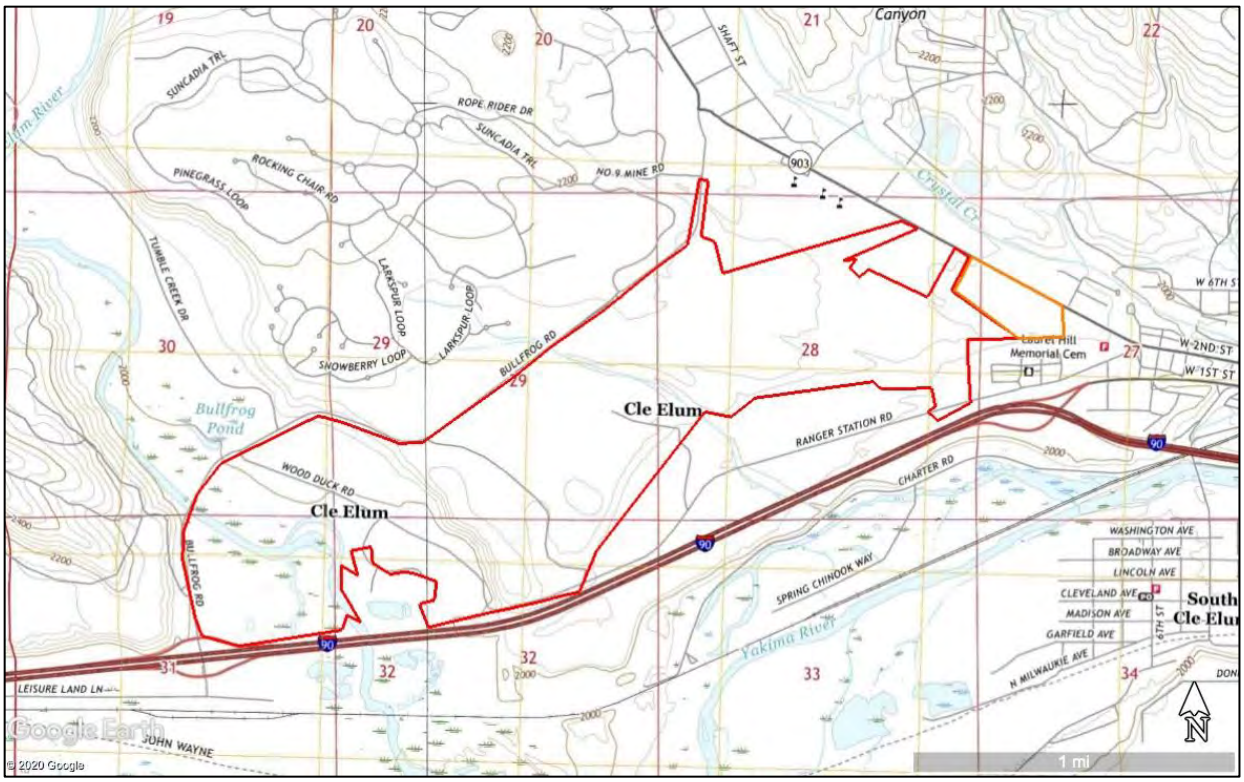


Figure 1. Portion of USGS 7.5' topographic map annotated with the project location in red and potential future commercial development in orange.



Figure 2. Satellite imagery annotated with the project location in red, potential future commercial development in orange, and areas anticipated to be disturbed based on 2019 project conceptual design in blue.

SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment

Alternative 6 represents the Applicant's proposed revisions to the approved Master Plan, and includes phased development of a mix of residential, RV resort, and open space/recreational facilities on the 824-ac. project site (Figure 3). A 25-ac. property adjacent to the site could be developed in commercial uses in the future. This alternative would develop 353 acres for residential, recreation, commercial, utility, and other uses, and would leave 471 acres as open space.

A 25-ac. property located off-site, adjacent to the site's eastern boundary could be developed in commercial uses at some point in the future by the property owner, Suncadia. This potential off-site development may involve a total of 150,000 sq. ft. of commercial uses, including: grocery store, retail, restaurant, and medical office uses, could be developed on approximately 18 ac. of the property. No development is proposed on the property at this time. However, hypothetical development of the property is included here in order to understand the potential impacts of this development, including the cumulative impacts of this development together with development of 47° N. Should this hypothetical development be pursued in the future, a cultural resources survey would be conducted on the 25-ac. property.

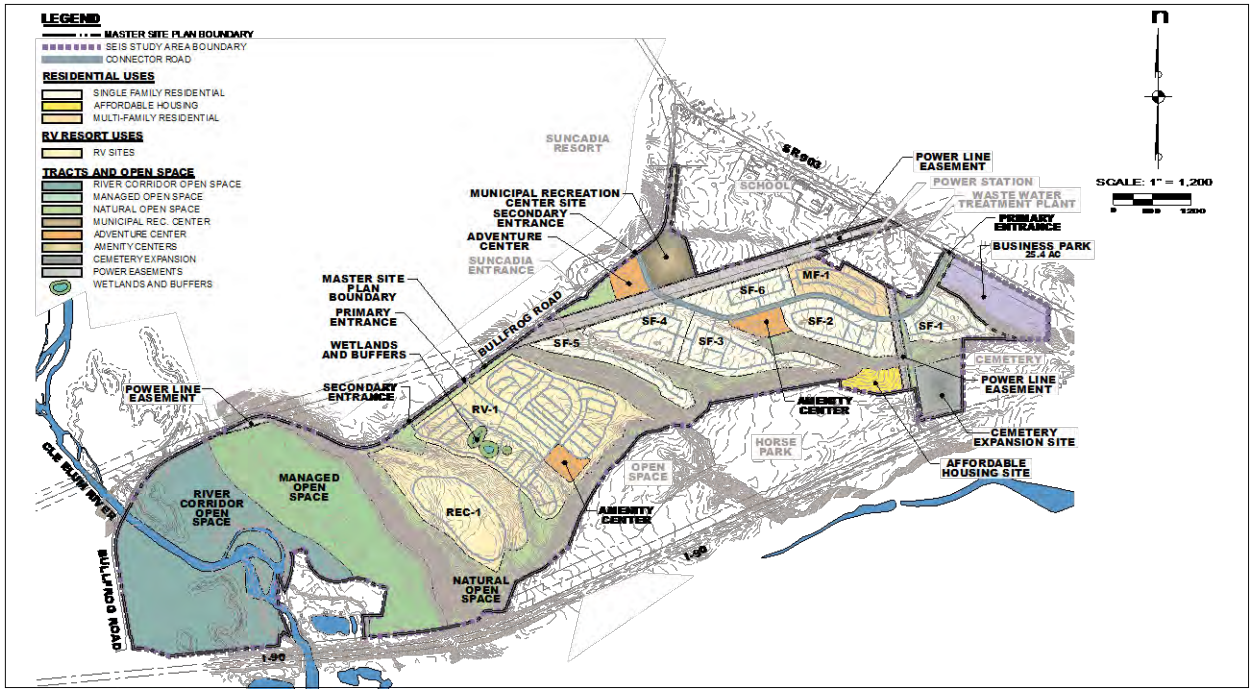


Figure 3. Figure illustrating SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment, prepared by ESM Consulting Engineers.

SEIS Alternative 5 (No Action Alternative) – Approved Bullfrog Flats Master Site Plan

The SEIS No Action Alternative assumes that development of FEIS Alternative 5 from the 2002 UGA FEIS, which became the approved Master Plan, would occur under current conditions (Figure 4). SEIS Alternative 5 would include development of a mix of residential and employment uses, open space/recreational facilities, and future development areas on a 1,100-ac. site. This alternative would develop a total of 577 acres for residential, recreation, commercial,

utility, and other uses. Development on 222 acres has occurred since 2002. This includes the development of the Horsepark in the Reserve area, water treatment plant, and school expansion, resulting in 355 acres of remaining development. In this alternative, 524 acres would remain as open space.

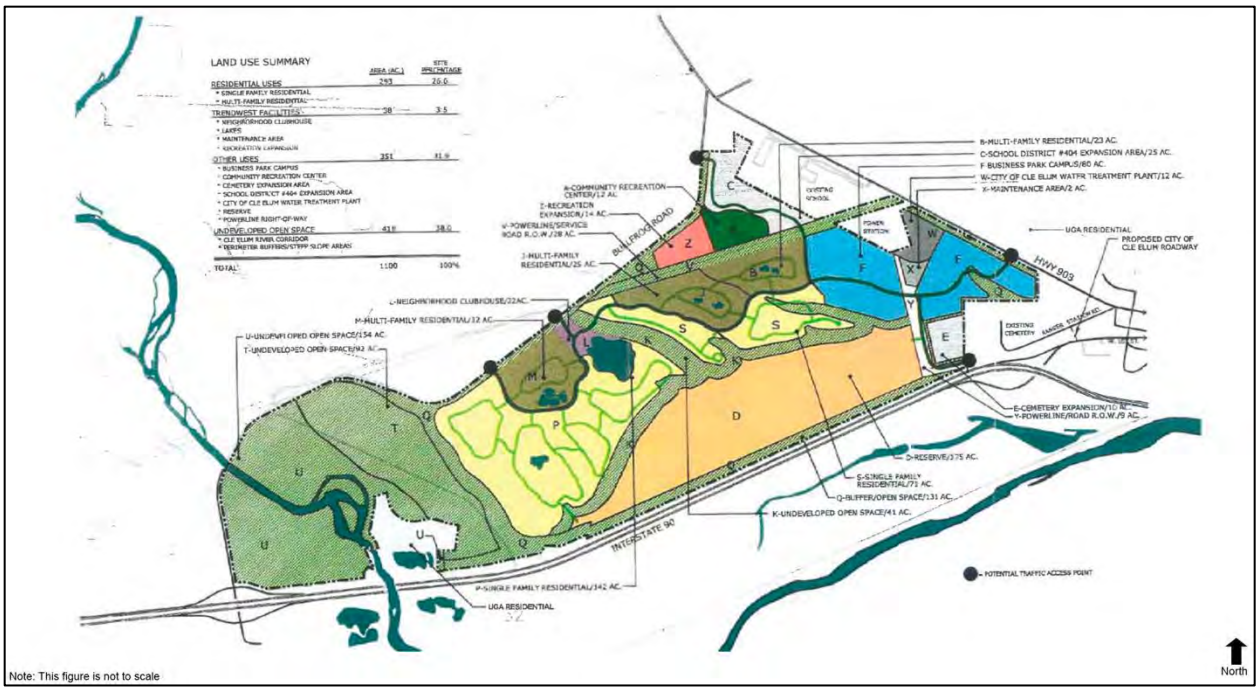


Figure 4. Figure illustrating SEIS Alternative 5 (No Action Alternative) – Approved Bullfrog Flats Master Site Plan (City of Cle Elum 2002).

2.0 Methodology and Regulations

2.1 2002 Cle Elum EIS Methodology and Regulations

Methodology and regulations for the 2002 Cle Elum EIS report (Cle Elum 2002) were described previously in the Draft EIS report (Cle Elum 2001). The methodology included pre-field and field elements. Archaeologists conducted pre-field research which included a search for previously recorded archaeological sites and survey reports on file at the Washington State Office of Archaeology and Historic Preservation (OAHP) (DAHP). Historical documents at federal and state archival centers were reviewed. In addition, county and city personnel knowledgeable about land use within the general Cle Elum area were interviewed (Cle Elum 2001).

Methods used to conduct the archaeological survey consisted of a literature review of historical documents, examination of historical photographs, a pedestrian survey, and documentation of cultural resources. Additionally, local residents and members of the Yakama Nation were interviewed to assist in identification of cultural resources within the Cle Elum UGA (Cle Elum 2001:3.13-1). According to Griffin and Churchill (1998b:17), YIN Cultural Resource Program manager Johnson Meninick, and members of his staff, visited the MountainStar resort property on several occasions and shared information on the past use of project lands.

The cultural resources survey was conducted in compliance with Section 106 of the National Historic Preservation Act, the Advisory Council on Historic Preservation Bulletin 38, the American Indian Religious Freedom Act of 1978 (PL 101-601), and the Native American Graves Protection and Repatriation Act of 1990 (PL 101-601).

2.2 2020 SEIS Methodology and Regulations

In 2019, an assessment was developed for the SEIS as a component of preconstruction environmental review with the goal of preventing cultural resources from being disturbed by the proposed project by identifying archaeological or historic sites within the project location. CRC's work was intended, in part, to assist in addressing state regulations pertaining to the identification and protection of cultural resources (e.g., RCW 27.44, RCW 27.53). The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly disturbing archaeological sites without a permit from the Department of Archaeology and Historic Preservation (DAHP), the Indian Graves and Records Act (RCW 27.44) prohibits knowingly disturbing Native American or historic graves. This project is subject to the State Environmental Policy Act (SEPA), which requires that impacts to cultural resources be considered during the public environmental review process. Under SEPA, the DAHP is the sole agency with technical expertise in regard to cultural resources and provides formal opinions to local governments and other state agencies on a site's significance and the impact of proposed projects upon such sites.

CRC's work consisted of review of available project information and correspondence provided by the project proponent, local environmental and cultural information, and historical maps; and field investigations. Field investigations consisted of archaeological monitoring of geotechnical exploration pits, pedestrian survey, and subsurface testing via hand excavated shovel test probes. On November 13, 2019, CRC contacted cultural resources staff at the Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) on a technical staff- to-technical staff basis to inquire about project-related cultural information or concerns (Attachment A). This communication was not intended to be or intended to replace formal government-to-government consultation with affected Tribes. At the time this report was completed no responses regarding the project had been received. Any additional information made available subsequent to the submission of this report will be included in a revision of this report. This assessment utilized a research design that considered previous studies, the magnitude and nature of the undertaking, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the project, as well as other applicable laws, standards, and guidelines (per 36CFR800.4 (b)(1)) (DAHP 2019a).

3.0 Affected Environment

3.1 2002 Cle Elum EIS Affected Environment

Information for the cultural resources that would potentially be impacted based on FEIS Alternative 5 from the 2002 Cle Elum FEIS was summarized from *A Land Use History of the Proposed Mountain StarResort: The Results of a Cultural Resource Survey along the Lower Cle Elum River* (Churchill and Griffin 1999). Churchill and Griffin (1999) identified twenty-three previously recorded archaeological resources that are located within the FEIS Alternative 5 area.

Of the 23 previously recorded archaeological resources, six were precontact (four sites and two isolates). All six precontact archaeological resources were found to be potentially eligible for listing on the National Register of Historic Places (NRHP) under Criterion D based on their ability to yield potential information about settlement and subsistence patterns that are significant to the understanding of regional prehistory.

Of the remaining 17 historic-era archaeological sites, 14 were designated as refuse scatters dating from the mid-nineteenth to the twentieth centuries. These were considered to potentially contain subsurface components that may be eligible for inclusion in the NRHP. The remaining three historic-era archaeological resources include the Cle Elum Chlorination Building, sections of the old Cle Elum waterline, and an isolated find. The 2002 report did not state whether or not these cultural resources were eligible for listing on the NRHP.

Also noted was the possibility that a segment of the Yakama Trail is located within an area designated as undeveloped open space according to the FEIS Alternative 5 plans. This area was considered to potentially have significance as a Traditional Cultural Property.

3.2 2020 SEIS Affected Environment

3.2.1 Overview

In 2019, a comprehensive assessment was conducted for the SEIS to determine the potential impacts to the affected environment. The context presented here summarizes environmental, ethnographic, historical, and archaeological information presented in: previously completed cultural resource assessment reports by reference; archaeological and historic data from DAHP and WISAARD records search; ethnographic resources; geological and soils surveys (e.g., USDA NRCS 2019; WA DNR 2019); historical maps and documents from Bureau of Land Management United States Surveyor General (USSG) Land Status & Cadastral Survey Records database, HistoryLink, Historic Map Works, HistoricAerials (NETR 2019), University of Washington's Digital Collection, Washington State University's Early Washington Maps Collection, and in CRC's library. Field investigations for this assessment were inclusive of archaeological monitoring, pedestrian survey, and subsurface testing.

3.2.2 Environmental Context

Overview: The project is located along the eastern slopes of the Cascade Mountains within the Cle Elum River Basin in Central Washington. The Cle Elum River passes through the western portion of the proposed project and converges with the Yakima River approximately .6 mile south of the project. The project boundary is partially demarcated by I-90 to the south and Bullfrog Road to the west and north. Elevation within the project ranges from 1982 to 2164 feet. The property is forested and is currently utilized by horseback riders, hikers, and bike riders. There are a number of trails and dirt roads throughout the project location. The project lies on two distinct terraces, the upper terrace being in the eastern two-thirds of the project and the lower terrace in the western third. The property is located within the *Abies grandis* (grand fir) zone of the North Cascades Province (Franklin and Dyrness 1973). Other plants within the project include snowberry, Oregon grape, blackberry, wild rose, strawberry, various grasses and weeds, kinnikinnick, and balsam root. Currently, ground disturbance is planned under the SEIS

alternatives for the upper terrace and potentially in two locations on the lower terrace where Public Trail Parks are planned.

Geomorphology: The topography and geology of the central Washington region has been shaped by a unique series of geomorphological events that are reflected in the landscape of the project location. The project is within the Northern Cascade Province characterized by north-south trending mountains comprised primarily of ancient sedimentary rock that have been partially metamorphosed. The peaks and ridges within this zone are relatively uniform in elevation and the valleys are consistently deep with steep sides (Franklin and Dyrness 1973).

As previously described by Ives and Gough (2010):

> Bedrock in the project area dates from the Eocene Epoch (ca. 55-34 million years ago) and includes a series of early Eocene sandstones and siltstones of the Swauk Formation capped by "the relatively undeformed lava flows of the middle Eocene Teanaway Formation that are in turn overlain by the coal-bearing fluvial sandstone beds of the Roslyn Formation." (Tabor et al. 2000:13). These extensively mined, coal bearing beds in the vicinity of the project area appear as "thick-bedded nonmarine arkosic sandstone, conspicuously white, weathering yellow" (Tabor et al. 1982:14).

The Pleistocene epoch, defined by successive glaciation during a cooler climatic period, began approximately 2.5 million years ago. During the Late Pleistocene or last glacial period (110,000-12,000 years ago), the Cordilleran ice sheet covered much of the American northwest and scoured the landscape during advance and retreat episodes caused by localized climate fluctuations. By the end of the Pleistocene, much of the Cle Elum and surrounding valleys (e.g., Keechelus and Kachess) were covered by extensive glaciation. The onset of climatic warming approximately 14,000 years ago caused the ice sheets to retreat to the north and began the transition into the Holocene. During this period, glacial lakes formed behind heavy terminal moraines that had built up across the valley (Franklin and Dyrness 1973; Saunders 1914).

Mapped Surface Geologic Unit(s): The surface geology in the project location is mapped as Qal, Pleistocene glacial and nonglacial deposits (WA DNR 2019). This unit is described as alluvium, colluvium, loess, till, outwash, glacial drift, etc. This includes sediments ranging in size from boulders to clay.

Mapped Soil Unit(s): Several soil units are mapped in the project location (USDA NRCS 2019). The majority of the project is located on an upper, flat terrace above the Cle Elum River. This portion of the project is mapped as Roslyn ashy sandy loam, 0 to 5 percent slopes. These soils are formed on terraces from glacial drift with a mantle of loess and volcanic ash. A typical profile of this soil unit is moderately decomposed plant material from 0 to 1 inch, two horizons of ashy sandy loam from 1 to 15 inches, loam from 15 to 37 inches, and two horizons of gravelly loam from 37 to 60 inches below the ground surface.

The lower terrace in the western section of the project location consists of Racker ashy sandy loam, 0 to 5 percent slopes. This soil forms on terraces from glacial outwash with a mantle of volcanic ash. A typical profile of this soil unit consists of moderately decomposed plant material from 0 to 1 inch, ashy sandy loam from 1 to 5 inches, gravelly ashy sandy loam from 5 to 12

inches, and two horizons of very cobbly loamy sand from 12 to 60 inches below the ground surface.

The slope between these two soil units consists of Dystroxerepts, 45 to 65 percent south slopes. This soil forms on escarpments in glacial outwash with an influence of volcanic ash in the upper part. A typical profile of this soil consists of moderately decomposed plant material from 0 to 1 inch, ashy sandy loam from 1 to 7 inches, gravelly ashy loam from 7 to 18 inches, and very gravelly sandy loam from 18 to 60 inches below the ground surface.

Climate: Since the late Pleistocene, three major episodes of climate change have contributed to variations in temperature, sediment accumulation, and vegetation development (Mehringer 1985). As discussed above, the climate became relatively warmer between approximately 13,000 and 9000 years B.P. and vegetation communities began to develop as glaciers retreated and landforms stabilized. The climate became increasingly warmer and drier during the Holocene. As a result, the streams and lakes that characterized the late Pleistocene began to evaporate resulting in a shift from hydric to xeric vegetation communities that were later replaced by mixed coniferous forests and deciduous shrubs by approximately 4000 B.P. By 2500 B.P., the climate shifted to a cooler and wetter regime comparable to the present-day conditions. Historically, the Columbia River valley and major drainages in the surrounding area contained a relatively rich environment where an array of plant and animal resources could be procured (Chatters 1986).

3.2.3 Archaeological Context

Archaeological evidence suggests that as the transition into an ice-free regional landscape allowed the area to be suitable for habitation in the late Pleistocene following the subsidence of glacially derived floods and the stabilization of local landforms. Subsequent changes to landforms, climate, and vegetation influenced the available resources and, consequently, the spatial distribution and subsistence strategies of humans living on the landscape. Recent investigations support human presence in northwestern North America dating to the late Pleistocene (Gilbert et. al 2008). The Cle Elum and Roslyn areas fall within an area encompassed by the Columbia River Plateau Cultural Area (Anastasio 1972; Ames et al. 1998). Early human occupation in the Cle Elum area and Columbia Plateau dates to approximately 13,000 years ago and provides the upper limit of generally accepted phase designations developed from previous research for the Plateau region (e.g., Beck and Jones 2010; Brown et al. 2019; Chatters 1986; Daugherty 1956; Galm et al. 1981; Greengo 1982, 1986; Hollenbeck and Carter 1986; Lohse 1985, 2005; Mehringer and Foit 1990; Nelson 1969; Rice 1969; Schalk 1982). These designations follow changes in settlement and subsistence strategies through time as climate, technology and population density changed. The trend noted in these phases is a pattern of adaptation from an upland hunting strategy to a semi-sedentary riverine-based subsistence organization over time. This change broadly occurs between an earlier tradition comprised of several phases (Western Stemmed Tradition: ca.13,000 to 11,000 B.P.; Clovis: ca. 11,500(?) to 11,000 B.P.; Windust: ca. 11,000 to 8000 B.P.; Vantage/Cascade: ca. 8000 to 4500 B.P.) and a subsequent, two-phase tradition: Frenchman Springs (ca. 4500 to 2500 B.P.), and Cayuse (ca. 2500 B.P. to 250 B.P.) (Ames et al. 1998; Swanson 1956) and is summarized in Berger (2015):

> The division between the two broad traditions is marked by the archaeological appearance of several apparent innovations. Pithouses are first recognized during this time; other artifacts appear, such as

> those suggestive of resource intensification (ground stone mortars, pestles, and net sinkers). Also apparent is increased variation in stone-working technology, decline in the predominance of basalt, and the appearance of small stemmed and larger notched projectile points. Archaeological evidence of a riverine-based residence pattern, supported by seasonal camps at upland locations, appears to correspond with the ethnographically observed Plateau pattern. The earliest manifestations of this residence pattern are present by about 4500 years ago.
>
> The Plateau winter village pattern, noted in ethnographic literature, appears to have been established by 2500 B.P. The Plateau subsistence model indicates a pattern of riverine settlement, a reliance on riverine and root resources, the development of complex fishing technologies, and the extension of trading patterns and extension of apparent political links (Greengo 1986; Nelson 1969; Swanson 1956). An increase in the frequency of net sinkers suggests a multifaceted economy emphasizing large-scale fishing, this possibly organized into inter-village groups. Points dated to the Cayuse period are generally smaller, with notching occasionally added to the chipped triangular form (Nelson 1969). Bow and arrow technology appears to be widespread by about 2000 years B.P., based on the morphology of projectile points from this time period. Cultural traditions established by the onset of the Cayuse phase appear to persist with little variation to the contact era, about 200 years ago, when disruptions associated with the Euro-American presence in the region resulted in a breakdown of traditional social patterns.

3.2.4 Ethnographic Context

Traditional Territory: The project location is situated within the traditional territory of the Sahaptin-speaking Kittitas and Yakama people (Ray 1936; Schuster 1998; Spier 1936). The Kittitas and Yakama utilized the upper Yakima River Region as a residential area as well as part of their seasonal rounds following their subsistence practices (Bynum et al. 1995). Other groups, such as the Southern Lushootseed-speaking Snoqualmie bands also ventured into the Cascade Range, and may have overlapped with the Kittitas and Yakama. The resource rich area provided groups the ability to sustain themselves following a generally cyclical pattern (Spier 1936). As summarized by Griffin and Churchill (1998a):

> The cultures of the Columbia River Plateau area were characterized by locally autonomous villages, which sometimes grouped together to form bands with a central chieftainship (Ray 1939; Anastasio 1975). Territorial boundaries were generally delineated by geography, but were crossed regularly (Chance 1973). Each band had a permanent winter village located along a principal water source with principal subsistence activities comprised of hunting, fishing and the gathering of plant resources. Subsistence activities generally followed a cyclical pattern. Winter villages were used until the snows melted and early spring roots and berries became available. From early spring to early summer, inhabitants would separate into smaller groups in order to hunt game and gather roots and berries in the uplands. Fishing activities dominated between mid-June to October. During the summer season small groups would begin to concentrate at fisheries along the principal area drainages. After the fish runs had ended, native peoples scattered into the mountain regions to hunt large game and pick berries. By the time the winter snows first began to appear, native families would have migrated back to their winter villages.

Trading centers such as The Dalles and Celilo Falls were important to interior Plateau people and Coast Salish alike. Goods such as roots, horses, furs, skins, dried clams and salmon, pemmican, clothing, baskets, and robes were items often traded (Schuster 1998). In addition to gathering on the Columbia River, trails through Snoqualmie Pass and the Cascade Mountains facilitated trade amongst the Plateau and Puget Sound Indian groups. These trails became useful for early non-Native travelers as well for trapping and trading (Prater 1981).

Ethnographic Place Names: Early ethnographers documented locations of villages and names for resource areas, water bodies, and other cultural or geographic landscape features from local informants. Knowledge of these features contributes to the broader archaeological context of the project location and the nature of the archaeology that may be encountered during this assessment. Similar to elsewhere, ethnographic named places are largely centered on water bodies (J. Miller 1998). On the southern end of Cle Elum Lake, northwest of the town of Cle Elum is *tlie'lam*, an important summer village (Ray 1936). This village was said to have attracted as many as 1,000 people to fish during June and July. The winter village *tátxanisha* was located on the southern banks of the Yakima River approximately four miles downriver from the town of Cle Elum. Another winter village, *tiánawins* was located near the mouth of the Teanaway River (Ray 1936; Shuster 1998). No recorded places have been mapped in the project location in available, reviewed literature.

3.2.5 Historic Context

The first non-native settlers, Catholic missionaries, 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 Cle Elum, and were placed on a reservation in the lower Yakima Valley.

> The project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855 (12 Stat. 951). The Treaty between Yakama Nation and the United States Government set forth that Yakama Nation shall retain rights to resources upon lands defined therein as Ceded Lands and Usual and Accustomed Places. These Treaty Reserved Rights have been defended and affirmed at the highest level of our judicial system. Yakama Nation continues to exercise Treaty-Reserved Rights to protect traditional resources. [N. Oliver, Yakama Nation Cultural Resources Program, electronic transmittal to City of Cle Elum, 2 October 2020; copy on file at CRC]

Most of the Kittitas had been forced onto the Yakama Reservation by 1859 (Kershner 2013). Soon after, cattle ranchers began to inhabit the lower Kittitas Valley in search of fertile range land. Miners discovered gold and coal in the area beginning in the 1870s and the influx of travelers began (Shideler 1986:43). In 1883, two childhood friends, Walter Reed and Thomas Gamble, reunited and filed preemption claims in what would become Cle Elum (Newland and Newland-Thompson 2018). Two years later, Reed amongst others discovered coal three miles to the west within the future townsite of Roslyn. Miners flocked to the region. Coincidently, the Northern Pacific railroad was steadily pushing westward and nearing the upper Kittitas Valley. A depot was planned for Teanaway; however Reed was able to influence the Northern Pacific and had the depot moved to Cle Elum and requested the engineers plot the town (Kittitas County Centennial Committee 1989). The name Cle Elum comes from Native names for the river. According to Oliver and Camuso (2017:13),

> The Cle Elum River is a traditional use area. Its native place name is *tlelam* its meaning "water passing through bluffs" or "converging ridges that open up into a valley" (Johnson Meninick, personal communication, May 10, 2017). Historic documents indicate the place name of *tle-el-lum* is derived by the native inhabitants name for the river, its meaning being "swift water" (Interstate Publishing Company 1904).

In addition to mining the nearby hills and working for the railroad, people found employment logging the surrounding forests, which primarily supported the burgeoning mining industry. A

town was starting to emerge. By 1890, Cle Elum had a population of 337 people. That same year a dedicated school building was built (Shideler 1986: 31).

By the 1920s, the mining industry in Cle Elum had begun to fade and it was completely gone by the 1960s. The secondary industry, logging, had already peaked by then as well (Kershner 2013). With the absence of coal mining and the decline of logging, the population of Cle Elum steadily declined through the majority of the twentieth century. The construction of the Sunset Highway in 1915, and later Interstate 90 in 1964, provided jobs in the short term and enabled Cle Elum the opportunity to become a welcome spot for travelers and tourists in the future (Shideler 1986). Cle Elum is the first substantial town on the east side of the Cascades from I-90 located just 31 miles east of Snoqualmie Pass. Cle Elum's economy became increasingly dependent on tourism and recreation through the twentieth century. In 2003 the construction of a residential/recreational resort, Suncadia, commenced which marked a new era of tourism in the Cle Elum area. The number of tourists visiting the area has increased greatly and the permanent population of the town is slowly rising. Within the project area, selective logging has likely occurred, however most recently the area has been utilized recreationally by horse riders, dirt bikers, and hikers.

3.2.6 Historical Records Search

Review of historical maps and aerial imagery provide an understanding of the historic and modern land use, and ownership of the project. The General Land Office (GLO) conducted early cadastral surveys to define or re-establish the boundaries and subdivisions of Federal Lands of the United States so that land patents could be issued transferring the title of the land from the Federal government to individuals. The 1881 GLO map depicts the project north of the Yakama River (Yakima River) with the Tleealum River (Cle Elum River) passing through the western section of the project location flowing from north to south (USSG 1881). A road is depicted on this map traveling in an east to west direction and passes through the project location in Sections 32 and 31. A small trail is also depicted on this map, crossing the Tleealum River (Cle Elum River) at the boundary of Sections 32 and 31. No other trails, homesteads, 'Indian villages', or other cultural features are shown in the project location.

Records on file at the Bureau of Land Management (2019) demonstrate the following land claims within the project:

- Thomas R. Brazil received a patent for the SE¼ of Section 28 on November 9, 1891 (BLM Serial Nr: WAYAA 056236; Document Nr. 1020; Authority: March 3, 1873: Sale-Coal Land [17 Stat. 607]);
- Marion H. Cahil received a patent for the NE¼ of Section 28 on February 7, 1893 (BLM Serial Nr: WAYAA 056249; Document Nr. 1104; Authority: March 3, 1873: Sale-Coal Land [17 Stat. 607]); J
- James A. Dennis received a patent for the SW¼ of Section 28 on November 9, 1891 (BLM Serial Nr: WAYAA 056239; Document Nr. 1023; Authority: March 3, 1873: Sale-Coal Land [17 Stat. 607]);
- Michael Richards received a patent for the NW¼ of Section 28 on August 18, 1888 (BLM Serial Nr: WAYAA 056225; Document Nr. 171; Authority: May 20, 1862: Homestead Entry Original [12 Stat. 392]);

- Northern Pacific Railroad Company received a patent for Section 29, the E½ of Section 31, and the NE ¼ of Section 32 on November 4, 1895 (BLM Serial Nr: WAYAA 045468; Document Nr. 44; Authority: July 2, 1864: Grant-RR Northern Pacific [13 Stat. 365]);
- George Elliot received a patent for the NE¼SE¼ of Section 30 and the S½SE¼ of Section 30 on February 7, 1893 (BLM Serial Nr: WAYAA 056251; Document Nr. 1106; Authority: March 3, 1873: Sale-Coal Land [17 Stat. 607]);
- Moses M. Emerson received a patent for the SW¼NW¼ of Section 32 on February 21, 1902 (BLM Serial Nr: WAYAA 056274; Document Nr. 1317; Authority: April 24, 1820: Sale-Cash Entry [3 Stat. 566]);
- Charles E. Rader received a patent for the SE¼NW¼ of Section 32 on March 3, 1893 (BLM Serial Nr: WAYAA 056254; Document Nr. 1129; Authority: March 3, 1873: Sale-Coal Land [17 Stat. 607]); and
- Winfield S. Wilson received a patent for the N½NW¼ of Section 32 on October 18, 1892 (BLM Serial Nr: WAYAA 056248; Document Nr. 1090; Authority: March 3, 1873: Sale-Coal Land [17 Stat. 607]).

The 1956 county atlas depicts the project within lands owned by Northwestern Improvement Company, which was a subsidiary of the Northern Pacific Railway. There are a number of roads within the project location, including the Old Sunset Hwy (Metsker 1956). Historic aerial imagery is not available until 1994 for the project location (Google Inc. 2019; NETR 2019). Imagery from this time shows the project within forested land with the transmission line corridors and Wood Duck Road in their current locations. A few trails can also be seen in imagery from that time. Between 1998 and 2006, a dirt road was constructed coming off of Bullfrog Road within the transmission line corridor and the trails previously noted became more apparent (Google Inc. 2019; NETR 2019).

3.2.7 Cultural Resources Database Review

A review of DAHP's WISAARD database identified previous cultural resource studies, recorded precontact and historic archaeological sites, and recorded historic built environment (e.g., sites, structures, buildings, objects, landscapes) in proximity to the project, which helps gauge the potential and likely nature of cultural resources present within the project location (DAHP 2019b). Cultural resources are typically defined as significant or potentially significant if they are identified as of special importance to an ethnic group or Indian tribe or if the resource is considered to meet certain eligibility criteria for the NRHP or other local, state, or national historic registers. Based on NRHP assessment criteria developed by the National Park Service (NPS 2002:2), historical significance is conveyed by properties that:

A. Are associated with events that have made a significant contribution to the broad patterns of our history; or

B. Are associated with the lives of persons significant in our past; or

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that

represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

According to NRHP guidelines, the "essential physical features" of a property must be intact for it to convey its significance, and the resource must retain its integrity, or "the ability of a property to convey its significance" (NPS 2002:44). The seven aspects of integrity are:

1) Location (the place where the historic property was constructed or the place where the historic event occurred);

2) Design (the combination of elements that create the form, plan, space, structure, and style of a property);

3) Setting (the physical environment of a historic property);

4) Materials (the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property);

5) Workmanship (the physical evidence of the crafts of a particular culture or people during any given period of history or prehistory);

6) Feeling (a property's expression of the aesthetic or historic sense of a particular period of time); and

7) Association (the direct link between an important historic event or person and a historic property).

Criteria used for assessment of potential eligibility for the Washington Heritage Register (WHR) are similar to NRHP criteria. Criteria to qualify include:

- The resource should have documented historical significance at the local or state level

- The resource should have a high to medium level of integrity

- The resource must be at least 50 years old. If newer, the resource should have documented exceptional significance

Eighty previously recorded cultural resources have been identified within one mile of the project location, 15 of which are recorded within the proposed project boundary. Seven cultural resource assessments have been conducted within the project location and an additional 21 assessments have been conducted within approximately one mile of the proposed project. These investigations have been completed for proposed land developments (Churchill and Griffin 1999a; Griffin and Churchill 1998a, 1998b, 1999; Landreau 2009; Schroeder and Landreau

2012; Vaughn et al 2012; Woody et al. 2008), a water treatment facility installation (Churchill and Griffin 1999b), the sale of Forest Service property (Beidl 2005), tree thinning (Churchill and Griffin 1998), timber harvesting (Churchill 1997; F. Miller 1998; Oliver and Camuso 2014), substation improvements (Schultze et al. 2012), fiber optic line installation (Fagan 1999), sinkhole restoration (Griffin and Churchill 1998c), fish habitat restoration (Hamilton et al. 2001), road improvements (Landreau and Schroeder 2013), railyard development (McCombs 2002), park installation (Oliver and Camuso 2017), pathway construction (Root and Ferguson 2008; Vaughn et al. 2011), weigh station development and expansion (Holstine 1997; Robinson 1996), transportation facility construction (Perhay and Amell 2019), slash pile burning (Griffin and Churchill 1998d), and horse park development and improvements (Ives and Gough 2010; Komen and Ives 2010). Most of the previous studies were considered to have a moderate to high probability of observing cultural materials. This was likely due to the proximity to the Cle Elum and Yakima Rivers and known use of the area. Only five previous studies completed within one mile did not identify archaeological sites (Churchill 1997; Landreau and Schroeder 2013; F. Miller 1998; Perhay and Amell 2019; Root and Ferguson 2008).

There are 80 sites recorded within a one-mile radius of the project location. Many of these sites have been evaluated for eligibility to be listed in the NRHP and have received a determination from DAHP. Sites recorded within one mile from the project include historic debris/refuse scatters (40), historic mining properties (4), historic railroad properties (1), historic buildings/foundations (3), historic homesteads (3), historic trail (1), historic waterline (1), historic bridge (1), historic isolates (5), precontact isolates (9), precontact camps (4), precontact lithic material (6), and depressions of unknown age or purpose (2). Of these sites, 15 (45KT1019, 45KT1227, 45KT1368, 45KT1376, 45KT1484, 45KT2092, 45KT2096, 45KT2098, 45KT2099, 45KT2139, 45KT2140, 45KT2141, 45KT2146, 45KT3331, and 45KT3332) are located within the proposed project boundary. Each of these sites has been evaluated for eligibility to be listed in the NRHP and received a determination from DAHP. Two sites were re-evaluated in the course of subsequent investigations but DAHP did not issue a new eligibility determination.

Sites 45KT2092, 45KT2096, 45KT2098, 45KT2099, 45KT2139, 45KT2140, and 45KT2141 were recorded as historic refuse scatters and were determined not eligible for the National Register of Historic Places (NRHP). These sites are either within, or close to areas with potential ground disturbances and may be impacted by the proposed project.

Site 45KT1484 was recorded as precontact isolate consisting of a single flake fragment and was determined not eligible for the NRHP. Although the site is located within the proposed project boundary, it is not within areas with proposed ground disturbances and will not be impacted by the project as planned.

Site 45KT2146 was recorded as an historic waterline and was determined not eligible for the NRHP. Portions of the historic waterline pass through areas of proposed ground disturbance and may be impacted by the proposed project.

Site 45KT3331 consists of the Cle Elum waterline chlorination building. This site was determined not eligible for the NRHP and is outside the areas with proposed ground disturbances; as such, it will not be impacted by the project as planned.

Site 45KT3332 is a historic debris scatter described as a two glass vessels and six vent hole cans discarded just east of Bullfrog Road. It was determined not eligible for the NRHP and is outside the areas with proposed ground disturbances; as such, it will not be impacted by the project as planned.

Site 45KT1019 was recorded as a sparse precontact lithic scatter and was determined eligible for the NRHP. When first recorded in 1995, the site had been heavily impacted by modern use (Powell 1995). A subsequent visit to the site described additional heavy impacts from logging and observed just one lithic flake (Churchill 1998). This site is located outside the areas of proposed ground disturbances and will not be impacted by the project as planned.

Site 45KT1227 was originally recorded as a precontact isolate consisting of a sparse scatter of lithic debitage and raw material (Powell 1994). In 1998, archaeologists revisited the site location and expanded the site to include three additional pieces of debitage and raw materials that were observed outside the original site boundary. The initial artifacts observed in 1994 were not relocated (Churchill 1999). Archaeologists once again revisited the site in 2010 (Ives and Gough 2010). At that time, 14 shovel test probes were excavated. No cultural materials or features were observed. The site was originally determined eligible for the NRHP, however Ives and Gough (2010) noted that the site no longer contains properties that have yielded or would be likely to yield information important in history or prehistory and therefore should no longer be considered eligible.

Site 45KT1368 was first recorded as a sparse lithic scatter and was determined eligible for the NRHP. The site was later found to be much more extensive, consisting of protohistoric aged artifacts, features, possible house structures, and human remains. This site is outside the areas with proposed ground disturbances and will not be impacted by the project as planned.

Site 45KT1376 was initially recorded as an isolated biface fragment and the site was determined eligible for the NRHP (Griffin 1998). Subsequent testing of the site recovered eight additional artifacts (six pieces of debitage, a uniface, and a battered cobble [pestle]) from between 20 and 40 cmbs (Churchill 1999). Archaeologists revisited and tested the site again in 2010 (Ives and Gough 2010). At that time, a single lithic flake was recovered from subsurface investigations consisting of 46 shovel test probes. Archaeologists noted that the low density and poor context of artifacts recovered from the site leave little research potential and recommend that the site no longer be considered eligible for listing in the NRHP. Regardless, the site is located outside the areas with proposed ground disturbances and will not be impacted by the project as planned.

Table 1. Archaeological sites recorded within a one-mile radius from the proposed project location (DAHP 2019).

Site Number	Site Type	Distance from Project	Historic Register Status
45KT1019	Precontact lithic scatter	Within project location but outside proposed development	Determined eligible

Site Number	Site Type	Distance from Project	Historic Register Status
45KT1227	Precontact lithic material	Within project location and proposed development	Determined eligible; later recommended not eligible (Ives and Gough 2010)
45KT1368	Precontact camp and human remains	Within project location but outside proposed development	Determined eligible
45KT1376	Precontact camp	Within project location but outside proposed development	Determined eligible; later recommended not eligible (Ives and Gough 2010)
45KT1484	Precontact isolate	Within project location but outside proposed development	Determined not eligible
45KT2092	Historic refuse scatter	Within project location and proposed development	Determined not eligible
45KT2096	Historic debris scatter	Within project location and proposed development	Determined not eligible
45KT2098	Historic refuse scatter	Within project location and proposed development	Determined not eligible
45KT2099	Historic refuse scatter	Within project location and proposed development	Determined not eligible
45KT2139	Historic refuse scatter	Within project location and proposed development	Determined not eligible
45KT2140	Historic refuse scatter	Within project location but outside proposed development	Determined not eligible
45KT2141	Historic refuse scatter	Within project location and proposed development	Determined not eligible
45KT2146	Historic waterline	Within project location and proposed development	Determined not eligible
45KT3331	Historic structure/waterline chlorinating building	Within project location but outside proposed development	Determined not eligible
45KT3332	Historic debris scatter	Within project location but outside proposed development	Determined not eligible
45KT1018	Depression	.61 mile [redacted]	Determined eligible
45KT1361	Precontact isolate	.1 mile [redacted]	Determined eligible
45KT1364	Precontact lithic material	.77 mile [redacted]	Determine eligible
45KT1365	Precontact lithic material	.66 mile [redacted]	Determined eligible
45KT1367	Depression	.1 mile [redacted]	Determined eligible
45KT1373	Precontact isolate	.67 mile [redacted]	Determine eligible
45KT1374	Precontact isolate	.47 mile [redacted]	Determined eligible
45KT1375	Precontact isolate	.5 mile [redacted]	Determined eligible
45KT1378	Historic cabin/homestead	.96 mile [redacted]	Determined eligible
45KT1380	Historic mine complex	.62 mile [redacted]	Determined eligible
45KT1642	Precontact isolate	.47 mile [redacted]	Determined not eligible
45KT1643	Precontact camp	.22 mile [redacted]	Not determined
45KT1644	Precontact camp	.1 mile [redacted]	Not determined
45KT1738	Precontact isolate	.35 mile [redacted]	Not determined
45KT2079	Historic refuse scatter	.1 mile [redacted]	Determined not eligible
45KT2080	Historic refuse scatter	.1 mile [redacted]	Determined not eligible
45KT2081	Historic refuse scatter	.21 mile [redacted]	Determined not eligible
45KT2082	Historic debris scatter	.71 mile [redacted]	Determined not eligible
45KT2083	Historic debris scatter	.04 mile [redacted]	Determined not eligible
45KT2084	Historic debris scatter	.06 mile [redacted]	Determined not eligible
45KT2085	Historic debris scatter	.10 mile [redacted]	Determined not eligible

Site Number	Site Type	Distance from Project	Historic Register Status
45KT2086	Historic debris scatter	.84 mile	Determined not eligible
45KT2087	Historic debris scatter	.57 mile	Determined not eligible
45KT2088	Historic debris scatter	.64 mile	Determined not eligible
45KT2090	Historic debris scatter	.5 mile	Determined not eligible
45KT2091	Historic foundation	.5 mile	Determined not eligible
45KT2093	Historic refuse scatter	.27 mile	Determined not eligible
45KT2094	Historic homestead	.42 mile	Determined not eligible
45KT2095	Historic debris scatter	.1 mile	Determined not eligible
45KT2097	Historic refuse scatter	.28 mile	Determined not eligible
45KT2100	Historic mining	.4 mile	Not determined
45KT2101	Historic homestead	.48 mile	Determined not eligible
45KT2135	Historic bridge	.06 mile	Determined not eligible
45KT2136	Historic refuse scatter	.35 mile	Determined not eligible
45KT2137	Historic refuse scatter	.41 mile	Determined not eligible
45KT2138	Historic refuse scatter	.44 mile	Determined not eligible
45KT2611	Historic debris scatter	.34 mile	Not determined
45KT2618	Historic isolate	.42 mile	Not determined
45KT2710	Historic railroad	.27 mile	Not determined
45KT2825	Historic debris scatter	.86 mile	Determined not eligible
45KT2901	Historic debris scatter	.83 mile	Determined not eligible
45KT3054	Historic mining	.1 mile	Determined not eligible
45KT3333	Historic debris scatter	.73 mile	Determined not eligible
45KT3343	Historic isolate	.15 mile	Determined not eligible
45KT3347	Historic refuse scatter	.27 mile	Not determined
45KT3348	Historic debris scatter	.5 mile	Not determined
45KT3349	Historic structure	.16 mile	Not determined
45KT3354	Historic mining	.62 mile	Determined not eligible
45KT3461	Precontact isolate	.55 mile	Not determined
45KT3462	Precontact isolate	.61 mile	Not determined
45KT3463	Precontact lithic material	.54 mile	Not determined
45KT3464	Precontact lithic material	.77 mile	Not determined
45KT3483	Historic refuse scatter	.05 mile	Not determined
45KT3486	Historic refuse scatter	.15 mile	Determined not eligible
45KT3487	Historic refuse scatter	.2 mile	Determined not eligible
45KT3488	Historic refuse scatter	.2 mile	Determined not eligible
45KT3489	Historic refuse scatter	.2 mile	Determined not eligible
45KT3490	Historic debris scatter	.1 mile	Determined not eligible
45KT3492	Historic refuse scatter	.06 mile	Determined not eligible
45KT3493	Historic isolate	.15 mile	Not determined
34KT3494	Historic isolate	.15 mile	Not determined
45KT3495	Historic isolate	.2 mile	Not determined
45KT3735	Historic refuse scatter	.27 mile	Not determined
45KT3736	Historic refuse scatter	.37 mile	Not determined
45KT4021	Historic trail	.18 mile	Determined eligible

There are five properties listed on either the NRHP or WHR or both within one mile of the project location: the Cle Elum-Roslyn Beneficial Association Hospital; the Chicago, Milwaukee, St. Paul, & Pacific Railroad; the Roslyn Riders Club House, Track & Arena; and the Roslyn Historic District (Table 2). None of these properties will be impacted by the current project plans.

Table 2. Historic register listed properties located within one mile from the project (DAHP 2019).

DAHP Property #	Address	Resource Name/Common Name	Build Date	Historic Use	Historic Register Status
DT179	South Cle Elum	Chicago, Milwaukee, St. Paul, & Pacific Railroad: South Cle Elum Yard	1909	Transportation	NRHP; WHR
700160	505 Power St Cle Elum, WA	Cle Elum-Roslyn Beneficial Association Hospital	1905	Hospital	NRHP; WHR
700380	SR903 and Martin Rd Cle Elum, WA	Roslyn Rider Club House, Track, and Arena	1956	Cultural landscape	WHR
700244	119 W 1st Cle Elum, WA	Douglas A Munro Memorial	1948	Memorial	WHR
DT00002	WA 2E Roslyn, WA	Roslyn Historic District	1886	Historic District	NRHP; WHR

Additionally, four structures have been inventoried within approximately .50 mile of the project location (Table 3). None of these structures are located within the project location and will not be impacted by the current project plans.

Table 3. Historic inventoried properties located within .5 mile from the project (DAHP 2019).

DAHP Property #	Address	Resource Name/Common Name	Build Date	Historic Use	Historic Register Status
4113	BNSF railroad between Easton and Cle Elum	BNSF Bridge No. 28.1	1942	Bridge	Not determined.
48143	803 W 2nd St Cle Elum, WA	Ranger Residence	1934	Single Dwelling	Determined eligible
633685	704 W 2nd St Cle Elum, WA	Ranger House	1910	Multiple Dwelling	Not determined
633207	713 Roslyn Pl Cle Elum, WA	None	1910	Single Dwelling	Determined not eligible

Two cemeteries have been recorded within one mile of the project location. They are located outside of the area proposed for development and will not be impacted by the project plans.

Table 3. Cemeteries located within approximately one-mile radius of the project (DAHP 2019).

Name	Record ID	Address	Established Date	Historic Register Status
Laurel Hill Memorial Park	45KT3086	119 W 1st St Cle Elum, WA	Unknown	Not determined
[redacted] lithic scatter	45KT1368	Cle Elum River, [redacted]	Precontact	Not determined

3.3 Archaeological Expectations

3.3.1 Archaeological Predictive Model

The DAHP statewide predictive model uses environmental data about the locations of known archaeological sites to identify where previously unknown sites are more likely to be found. The model correlates locations of known archaeological data to environmental data "to determine the probability that, under a particular set of environmental conditions, another location would be expected to contain an archaeological site" (Kauhi and Markert 2009:2-3). Environmental data categories included in the model are elevation, slope, aspect, distance to water, geology, soils, and landforms. According to the model, the majority of the project location is ranked as "Survey Highly Advised: Very High Risk" (DAHP 2019b). Small sections within the project location are ranked as "Survey Highly Advised: High Risk", and "Survey Recommended: Moderate Risk". These areas are located on steep slopes between the upper and lower terraces.

3.3.2 Archaeological Expectations

This assessment considers the implications of the predictive model coupled with an understanding of geomorphological context, local settlement patterns, and post-depositional processes to characterize the potential for archaeological deposits to be encountered. Precontact, ethnographic, and historic data generally support the ranking generated by DAHP's predictive model. Surface geology and soils in the project are the product of Late Pleistocene glaciers. Mapped surface geology and soils suggest that deposition since the outburst floods at the end of the Pleistocene has been minimal and any archaeological deposits would be relatively near the ground surface.

Sections of the project location may have been disturbed by prior developments such as those for which previous cultural resource assessments were conducted. These assessments were completed in response to land development (Churchill and Griffin 1998a, 1998b); water treatment facility installation (Churchill and Griffin 1999); horse park development and improvements (Ives and Gough 2010; Komen and Ives 2010); and weigh station development and expansion (Robinson 1996). However, the majority of the project location has not been surveyed and likely has minimal disturbances. In these areas, if present, intact precontact archaeology would be observed on or near the ground surface and atop the Pleistocene glacier deposits, which are anticipated to be shallowly buried. Precontact archaeology may range in age from Clovis-era (approximately 12,000 years ago) to the ethnohistoric period (beginning approximately 200 years ago). Precontact activities in the project location were likely more transient in nature and could have included overland travel, temporary camps, and/or resource gathering/hunting activities as well as possible ceremonial activities. Precontact materials that may be observed could include middens, caches, hearth features, fire-modified rock, lithic scatters, bone or stone tools or implements, faunal remains, and/or other materials that may represent more transient activities. Precontact sites that have been previously recorded within the project primarily consist of lithic scatters or isolates. Two camps, one with a burial, have been recorded near the Cle Elum River. Because ground disturbing activities are proposed far from the river, it is not likely that sites of a more permanent nature would be observed.

Historic-era archaeological materials, if present, would likely be on or near the ground surface and consist of historic debris scatters or concentrations related to camping, mining, or logging.

These resources are not anticipated to embody the potential to be significant (i.e. intact) and would not likely be eligible for listing on historic registers. Numerous refuse scatters have been recorded near and within the project location. It is anticipated that if historic-era archaeological materials are observed, they would likely be of similar nature.

3.4 Field Investigations

3.4.1 Archaeological Monitoring

Date(s) of Monitoring: October 21-24 2019

Monitoring Methodology: Archaeological monitoring entailed having an archaeologist on site to monitoring geotechnical investigations consisting of the excavation of 47 exploration pits. Exploration pits would be excavated to a maximum depth of 17 feet and would be 3-4 feet wide and 8-9 feet long. The goal of monitoring was to observe subsurface conditions and identify any buried precontact or historic-era archaeological materials or human remains that may be encountered. Monitoring was performed by or under the supervision of a "professional archaeologist" (RCW 27.53.030 (8)).

The monitoring archaeologist stood in close proximity to construction equipment in order to view subsurface deposits as they are exposed and was in close communication with equipment operators to ensure adequate opportunity for observation and documentation. Archaeological monitoring sought to identify potential buried surfaces, anthropogenic sediments, and archaeological features such as shell middens, hearths, or artifact-bearing strata. The monitoring archaeologist inspected project excavations and the recovered sediments for indications of such archaeological resources. The archaeologist was provided the opportunity to screen excavated sediments and matrix samples when it was judged useful to the identification process. It was not expected that any modern fill (e.g., imported culturally-sterile fill) or glacial sediments would be included in screening procedures. If cultural materials were observed in spoils piles, it was expected that these would be removed for examination and that the opportunity to screen spoil sediments would be available. Tested locations were photographed and recorded using a handheld GPS unit.

Monitoring conducted by: Nicole Clennon

3.4.2 Archaeological Survey

Total Area Examined: The entire project site (824 acres) + adjacent property (25 acres).

Areas not examined: None.

Date(s) of Survey: November 18-20, 2019

Weather and Surface Visibility: Weather conditions consisted of cool (45 – 50 °F) partially cloudy days. Mineral soil visibility in the project location was generally poor due to dense forest

duff. Gravelly soils were observed in several areas, primarily on trails and dirt roads throughout the project.

Field Methodology: Fieldwork consisted of pedestrian surface survey and subsurface testing via hand excavated shovel test probes. This project is currently in design phase and archaeological survey was focused on locations of anticipated ground disturbance. This survey did not include the boundary delineation or evaluative testing of previously known archaeological sites. The area designated as potential future commercial space was not investigated during this field investigation. This location will need to be investigated in the future if development is sought. Surface survey was conducted in meandering transects targeting locations with mineral soil visibility. Shovel probes were excavated in areas with proposed ground disturbances and areas that would likely contain deeper Holocene loess based on observations gathered during archaeological monitoring. Probes were manually excavated with a shovel and measured 40 centimeters (cm) in diameter. Target depth for the probes was 20 cm into intact glacial deposits or to the extent of the shovel (approximately 1 m). All sediments were passed through ¼-inch hardware mesh to screen for artifacts. Probe locations were recorded using a handheld GPS unit.

Fieldwork conducted by: Nicole Clennon and Lizzie Fellars. Notes are on file with CRC.

3.5 Results and Recommendations

3.5.1 Investigation Results

Archaeological Monitoring: Archaeological monitoring consisted of observing the excavation of 47 exploration pits on the upper terrace of the project location between Interstate 90 and Bullfrog Road (Figure 5). Daily archaeological monitoring logs were completed and are provided as Attachment B.

The exploration pits extended to depths between 3 and 17 feet below surface and were typically measured 3-4 feet wide by 8-9 feet long. The depositional context of the exploration pits consisted of topsoil, atop varying amounts of loess, atop either glacial till or glacial outwash.

Archaeological monitoring of geotechnical investigations did not result in the identification of artifacts of cultural deposits nor did it demonstrate that the tested locations had a high probability to contain as yet unrecorded archaeological deposits. Monitoring demonstrated that sediments in the horizontal and vertical limits of the project's anticipated ground disturbance had the potential to contain cultural deposits within the loess deposits. The loess deposits varied from 0 to 8.5 feet below the surface, but were most often less than 3 feet deep.

[*figure redacted due to sensitive information*]
Figure 5. Satellite imagery annotated with the project location in red, potential future commercial development in orange, previously recorded archaeological sites, and the locations of 2019 geotechnical testing (Exploration Pits = EP).

Archaeological Survey: Pedestrian survey provided information on the current condition of the project and helped to gauge the potential for as-yet unknown archaeology within the project location. The project vegetation is comprised of a mix of evergreen trees (e.g., ponderosa pine, Douglas fir), shrubs (snowberry, Oregon grape, blackberry, wild rose), various grasses and weeds, kinnikinnick, and balsam root (Figure 6). The forest appeared to have been logged selectively leaving a relatively open forest canopy and trees ranging in age. Few dirt roads and trails were observed on the upper terrace (eastern and central portion of the project location) (Figures 7 and 8). Transmission line corridors were present in the far eastern and northern portion of the project location (Figure 9). The upper and lower terrace were separated by a steep slope. Both the upper and lower terraces were generally flat, with slightly more undulation on the upper terrace. Horse trails and an obstacle course were observed on the lower terrace (Figure 10). No previously unrecorded historic-era or precontact cultural materials were observed during surface survey.

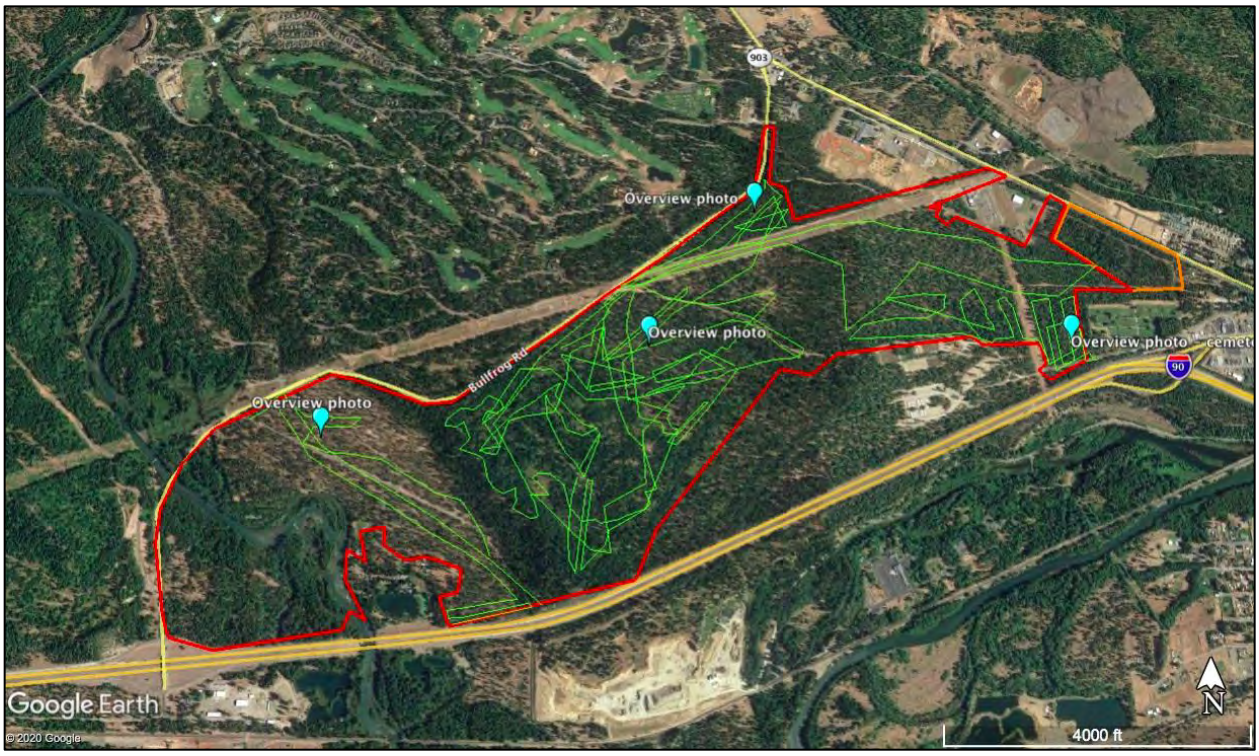


Figure 6. Satellite imagery annotated with the project location in red, approximate survey transects in green, and overview photo locations in blue.



Figure 7. Overview of project area as seen within the proposed cemetery expansion, view to the east.



Figure 8. Overview of project area as seen within the upper terrace, view to the southwest.



Figure 9. Overview of project area from the upper terrace demonstrating an example of a dirt road, view to the east.



Figure 10. Overview of project area from the lower terrace demonstrating an example of the horse obstacle course features, view to the east.

Archaeologists revisited previously recorded sites that were located within or near areas of proposed disturbances, with the goal of documenting any changes in site conditions since they were last inventoried. State of Washington Archaeological Site Inventory Form updates would be completed if any substantial changes were observed.

Site 45KT1227

This site was originally recorded as a sparse lithic scatter (Powell 1994). Subsequent visits to the site location were unable to relocate the lithic scatter, but did observe three additional artifacts (two flakes and one raw material fragment?) on the ground surface (Griffin and Churchill 1998a). The site boundary was expanded at that time and was determined eligible for the NRHP in 1999. The site was resurveyed and tested in 2009 (Ives and Gough 2010). No cultural materials or features were observed at that time. The site was recommended to be no longer eligible for the NRHP at that time. No evidence of the site was observed during the current investigation.

Site 45KT2092

This site was originally recorded as refuse scatter consisting of two isolated scatters and a large pile of rocks (Griffin and Churchill 1998a). A subsequent visit to the site relocated the rock pile, but saw no evidence of the historic domestic refuse dump (Ives and Gough 2010). Archaeologists revisited the site during the current investigation. Approximately 20 vent hole and sanitary cans, 5 ceramics, and one window glass shard were observed (Figure 11). There was no evidence of the large rock pile noted in 1998 and 2010. This site is located in close proximity to a developed portion of a horse obstacle course and was likely altered to accommodate horse traffic. The archaeological site inventory form for this site was updated (Attachment C).



Figure 11. Representative photo of ceramic artifacts observed at 45KT2092.

Site 45KT2096

This site was originally recorded as a large historic refuse scatter consisting of nine clusters of refuse with sparse amounts of refuse between the clusters (Griffin and Churchill 1998a). Approximately 528 tinned cans, 77 glass fragments, and other miscellaneous debris were identified at that time. The site has changed considerably since then. Evidence of the site was observed in the current investigation; however the number of artifacts has greatly diminished through time. Approximately 100 tinned cans and 50 bricks were observed during this investigation (Figures 12 and 13). It is unknown whether artifacts have been buried by natural processes or removed by relic collectors.



Figure 12. Representative photo of a tinned can concentration observed at 45KT2096.



Figure 13. Representative photo of the brick concentration observed at 45KT2096.

Site 45KT2098

This site was originally recorded as an historic domestic refuse scatter. The site location as mapped was revisited (Griffin and Churchill 1998a). No evidence of the medium-sized refuse scatter was observed during this field investigation. Whether the site has been eradicated by land altering activities, buried by natural processes, or removed by relic collectors is unknown. The archaeological site inventory form for this site was updated (Attachment C).

Site 45KT2139

This site was originally recorded as a historic refuse scatter (Griffin and Churchill 1998a). Archaeologists visited the site in 2010 (Ives and Gough). The site was not relocated at that time. No evidence of the sparse historic refuse scatter was observed during the current investigation. Whether the site has been eradicated by land altering activities, buried by natural processes, or removed by relic collectors is unknown.

Site 45KT2141

This site originally consisted of discrete scatter of tin cans, glass fragments, and few ceramic shards (Griffin and Churchill 1998a). When the site was revisited in 2010 (Ives and Gough), archaeologists observed the previously recorded domestic scatter in addition to a scatter of oyster shell. They suggested the shell was most likely a modern deposit. Archaeologists revisited the site in 2019. The site was observed to be in the same condition as previously recorded (Figures 14 and 15).



Figure 14. Overview of 45KT2141, view to the south.



Figure 15. Representative photo of a Rainier beer can observed at 45KT2141.

45KT2146 and 45KT3331

This site was originally recorded as the Cle Elum Waterline Complex. The recorded waterline (45KT2146) spanned from the Cle Elum River to the town of Cle Elum (Griffin and Churchill 1998a). The section of the waterline within the currently proposed project has been revisited numerous times, most recently in 2009 (Ives and Gough 2010). Segments of the original wire wrapped wooden stave waterline, as well as the chlorination building (45KT3331) were observed and generally remain as previously described (Figures 16 and 17).



Figure 16. Representative photo of wire wrapped wooden piping observed at 45KT2146.



Figure 17. Overview of the chlorination building (45KT3331) associated with the Cle Elum waterline, view to the northwest.

In addition to the 47 monitored geotechnical explorations described above, archaeological subsurface investigations were achieved through the placement of 23 shovel probes (Figures 18 – 21; Attachment D). Shovel probes were placed in areas with proposed ground disturbance to supplement observations from archaeological monitoring of the geotechnical explorations. Data from archaeological monitoring was utilized to target locations with a higher likelihood of containing Holocene loess that could potentially have intact archaeological material. The number of shovel test probes is considered adequate based on multiple lines of evidence. There have been numerous prior investigations consisting of surveying and subsurface testing throughout the project location. Widespread surface glacial deposits were observed during monitoring of geotechnical exploration pits. Additionally, previously recorded precontact sites in the project vicinity are generally located on the lower terrace near the river which will not be developed and is within the proposal's designated open space.

Probes 1 – 4 were placed in the proposed Adventure and Municipal Center locations. Probes 5 – 16 were located on the upper terrace where the majority of ground disturbance is proposed for construction of an RV Resort and Manufactured Housing. Probes 17 – 20 were located in the proposed cemetery expansion. Probes 21 – 23 were placed in each of the proposed Public Trail Parks. Probes ranged in depth from 22 to 100 centimeters below the surface, with an average depth of 59.5 centimeters. Seven of the probes consisted of a soil profile that can be described as a stratum of duff and sandy loam topsoil, followed by a stratum of sandy loam loess atop Pleistocene glacial sediments. Holocene loess was not observed in the remaining sixteen probes. No precontact or historic-era materials or deposits were identified. The probes were backfilled immediately following documentation.

[*figure redacted due to sensitive information*]
Figure 18. Satellite image of project location in red, potential future commercial development in orange, previously recorded archaeological sites, and probe locations.



Figure 19. Overview of typical subsurface conditions as observed in probe 9.



Figure 20. Overview of typical subsurface conditions as observed in probe 14.



Figure 21. Overview of typical subsurface conditions as observed in probe 21.

H-02

4.0 Impacts of the Alternatives

4.1 2002 Cle Elum FEIS Impacts

FEIS Alternative 5 – Original Bullfrog Flats Master Site Plan

In the 2002 Cle Elum EIS study, potential impacts to historic and cultural resources are inexplicit and do not include specific sites that may potentially be impacted. Twenty-three cultural resources were identified within the proposed project. It was stated that the majority of the development was proposed for the upper two-thirds of the property with the lower third reserved for undeveloped open space and the majority of the previously recorded sites are located within the lower third of the project location. Impacts to individual sites were not determined, as the specific location of ground-disturbing activities and the sites were not specified. It was noted that construction could potentially impact undiscovered archaeological sites as well as previously recorded sites. Impacts could include disturbance from excavation, increased pedestrian and vehicular traffic, compaction of sediments associated with project staging areas, erosion, illegal collecting, and spiritual diminution of possible Traditional Cultural Properties. In addition, potential construction impacts to the Cle Elum Chlorination Building were considered to include destruction of the structure and/or an alteration to the property's setting (Cle Elum 2002).

4.2 2020 SEIS Impacts

The magnitude of impacts to cultural resources was considered less-than-significant or significant, as follows:

- Less-than-significant—Impacts were considered less-than-significant if they pose little to no risk, whether direct or indirect, to documented archaeological or historic resources or potentially eligible for listing on the NRHP and/or the WHR.

- Significant—Impacts were considered significant if they pose a risk, whether direct or indirect, to documented archaeological or historic resources eligible or potentially eligible for listing on the NRHP and/or the WHR.

SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment

A comprehensive analysis conducted in 2019 for the SEIS identified a number of potential impacts to cultural resources under the current proposal (SEIS Alt. 6 – Proposed 47° North Master Site Plan Amendment). Seven previously recorded sites were located within or near areas of proposed disturbance (45KT1227, 45KT2092, 45KT2096, 45KT2098, 45KT2139, 45KT2141, 45KT2146). Four of these previously recorded sites (45KT2092, 45KT2096, 45KT2141, 45KT2146) were relocated in 2019, and each of these has been determined not eligible for the NRHP. The current investigation did not identify any evidence to recommend these sites eligible for the NRHP. The remaining three sites (45KT1227, 45KT2098, 45KT2139) were not relocated during this investigation. Of these sites, only one (45KT1227) had been previously determined eligible for the NRHP. This site, originally recorded as a sparse lithic scatter, was thoroughly tested in 2010. At that time, no evidence was observed of the site and it was determined to no longer contain the properties necessary to remain eligible for listing on the NRHP. No evidence of the site was observed again during the current investigation and we concur with the eligibility recommendation made in 2010 (Ives and Gough 2010). The above-mentioned sites could

potentially be impacted or destroyed by proposed site development; however, due to the NRHP status, impacts to these sites would not be considered significant. Potential impacts to as-yet unknown cultural resources would be less under SEIS Alternative 6 than under FEIS Alternative 5 due to the decreased acreage proposed for development (353 acres versus 577 acres, respectively). However, of the 577 acres proposed in FEIS Alternative 5, 222 acres have been developed since 2002 (e.g., for the Horse Park, water treatment plant, and school expansion). The 25-acre potential future commercial area was not explored in the 2019 field investigation and may contain as-yet unknown cultural resources.

SEIS Alternative 5 (No Action Alternative) – Approved Bullfrog Flats Master Site Plan
Under the SEIS Alternative 5, although cultural resources could potentially be impacted or destroyed, these actions would not be considered significant because these sites have been determined not eligible for listing on the NRHP. Based on the results of the investigation for the 2020 SEIS, potential impacts to as-yet unknown cultural resources would be greater due to the larger acreage proposed for development under SEIS Alternative 5. However, some sites that had not been evaluated for listing on the NRHP when the 2002 EIS was prepared (45KT2146, 45KT3332, 45KT2141, 54KT2139, 45KT3331, 45KT2140, 45KT2092, 45KT1484, 45KT2099, 45KT2098, 45KT2096) have since been determined not eligible for listing on the NRHP. Impacts to such sites would not be considered significant. A number of recorded archaeological resources (45KT2093, 45KT2080, 45KT2081, 45KT2097, 45KT3343, 45KT2079) are located within the 175-acre reserve in the SEIS Alternative 5 plan. Since the 2002 EIS, development of the Horse Park has occurred in this area, and all of these sites have been determined not eligible for listing on the NRHP. Sites 45KT1019, 45KT1368, 45KT1376 remain eligible for listing on the NRHP but are not within areas of proposed ground disturbance. There was no evidence of the Yakama Trail that was considered to potentially be significant as a TCP.

5.0 Conclusions

The 2002 Cle Elum EIS identified 23 cultural resources within the project location. At that time, impacts to specific sites were not discussed. However, a number of mitigation measures were identified to reduce or eliminate potential impacts to cultural resources. These measures included; 1) subsurface testing in order to determine if significant cultural resources are present, 2) if reasonably possible, avoid all cultural resources and establish a 50-m buffer around cultural resources, 3) if avoidance of cultural resources is not possible, testing of the sites to determine eligibility for listing on the NRHP is recommended, and 4) an archaeological permit would be obtained from OAHP (DAHP) before land is disturbed within known potentially significant sites.

In 2019, CRC completed background research, tribal communication, and field investigations, inclusive of archaeological monitoring of 47 geotechnical test trenches, pedestrian survey, and excavation of 23 shovel probes for the 2020 SEIS (Figure 22). Observed sediments were generally consistent with those mapped for the location, Holocene loess atop Pleistocene sediments. In many locations, the Holocene loess was not observed. The excavation of geotechnical test trenches provided a significant coverage over the areas anticipated to be disturbed based on project conceptual design. Shovel probes were excavated in locations that are anticipated to be disturbed that were not covered by the test trenches and in locations that would have a greater likelihood of containing Holocene sediments based on observations during

monitoring. The geotechnical test trenches demonstrated pockets of higher probability areas within the middle section of the project boundary, on the western half of the upper terrace. Some of the trenches and shovel test probes in this area contained Holocene sediments while others did not. Because of this, many of the shovel probes were concentrated in this area.

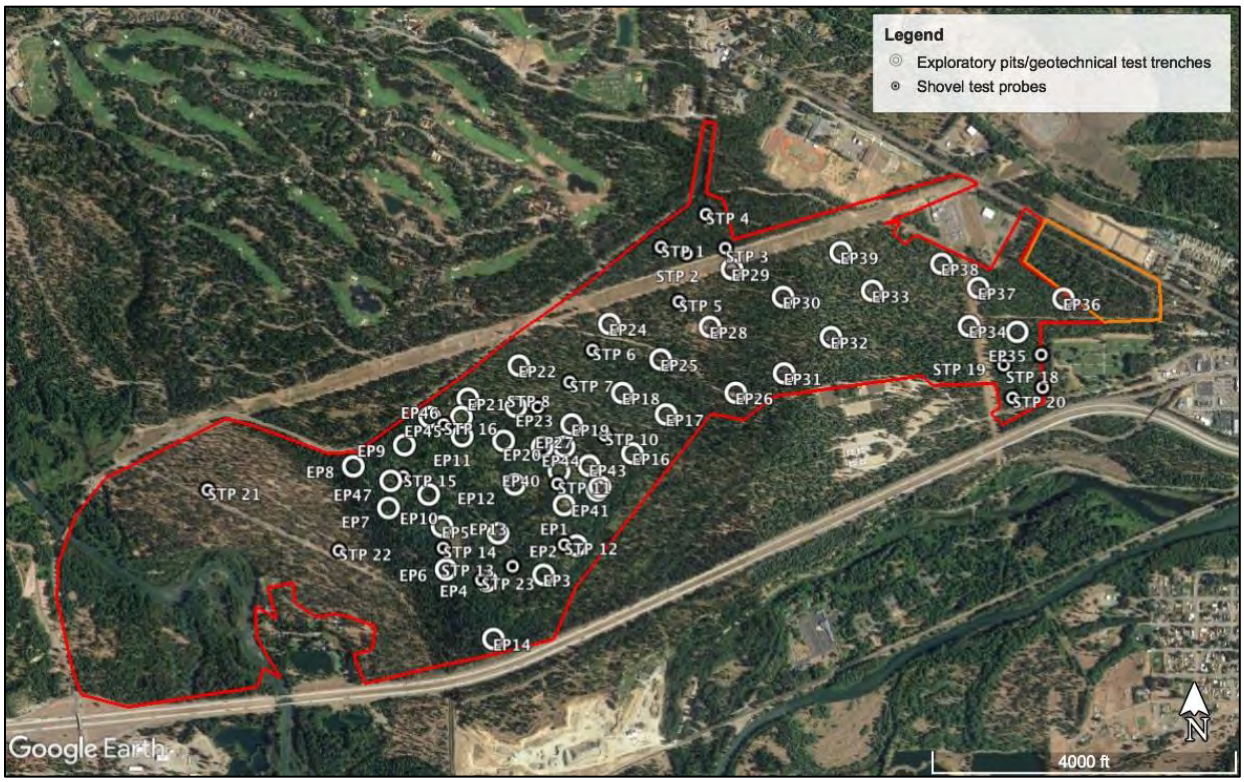


Figure 22. Satellite image of project location in red, potential future commercial development in orange, geotechnical test trench locations, and probe locations.

CRC's investigations resulted in the identification of 15 previously recorded precontact or historic-era archaeological sites within the project location (Table 4, Figures 23 – 37). Seven of these sites are located in or near proposed ground disturbances. One of these sites was previously determined eligible for the National Register, however no evidence of the site remains. Field investigations did not identify any as yet unrecorded historic-era or precontact cultural resources within the project, nor was any evidence found to suggest a high potential for as-yet unrecorded archaeological deposits to be contained within the proposed development areas. No significant impacts on cultural resources have been identified with development of the SEIS alternatives.

Table 4. Summary of archaeological sites and proposed project plans.

Site Number	Site Type, Contents, and Dimensions	Proposed Action in Site Location
45KT1019	Precontact lithic scatter consisting of one lithic flake.	None; located within river corridor open space.
45KT1227	Precontact lithic material consisting of a total of 6 lithic flakes and pieces of raw material observed in 1994 and 1998 (three pieces each time). No artifacts were observed in 2010 or 2019 site visits.	Public trail park.

Site Number	Site Type, Contents, and Dimensions	Proposed Action in Site Location
45KT1368	Precontact camp consisting of lithic artifacts, features, possible house structures, and human remains. Measures 50 m (N/S) by 30 m (E/W).	None; located within river corridor open space.
45KT1376	Precontact camp consisting of a total of 10 pieces of lithic material (biface fragment, seven pieces of debitage, a uniface, and a battered cobble [pestle]). Measures 90 m by 130 m.	None; located within managed open space.
45KT1484	Precontact isolate consisting of a single flake fragment.	None; located within managed open space.
45KT2092	Historic refuse scatter consisting of over 100 tinned cans, over eight ceramic fragments, six glass fragments, and a possible bumper fragment. Measures 54 ft by 78 ft.	Public trail park.
45KT2096	Historic debris scatter consisting of nine clusters of historic refuse totally approximately 528 tinned cans, 77 glass jar fragments, and an assortment of miscellaneous debris. Measures 1200 ft by 1200 ft.	Municipal rec center.
45KT2098	Historic refuse scatter consisting of 29 tinned cans, and few glass and ceramic artifacts. Measures 65 ft by 81 ft.	Affordable housing development
45KT2099	Historic refuse scatter consisting of seven tinned cans. Measures 13 ft by 16 ft.	Manufactured housing.
45KT2139	Historic refuse scatter consisting of 26 tinned cans. Measures 21 ft by 24 ft.	Public trail park.
45KT2140	Historic refuse scatter consisting of 69 tinned cans, two teapots, and car body parts. Measures 262 ft by 131 ft.	None; located within managed open space.
45KT2141	Historic refuse scatter consisting of seven tinned cans, 24 glass fragments, and over seven ceramic fragments. Measures 90 ft by 75 ft.	Public trail park.
45KT2146	Portion of the Cle Elum Waterline. The waterline measures over 7 miles, .90 mile of which is within the proposed project.	Public trail park.
45KT3331	Historic structure/waterline chlorinating building. Measures 20 ft by 12 ft.	None; located within managed open space.
45KT3332	Historic debris scatter consisting of six tinned cans and two glass bottles. Measures 25 ft by 25 ft.	None; located within river corridor open space.

[*figure redacted due to sensitive information*]
Figure 23. Satellite image of 45KT1019 within project location.

[*figure redacted due to sensitive information*]
Figure 24. Satellite image of 45KT1227 within project location.

[*figure redacted due to sensitive information*]
Figure 25. Satellite image of 45KT1368 within project location.

[*figure redacted due to sensitive information*]
Figure 26. Satellite image of 45KT1376 within project location.

[*figure redacted due to sensitive information*]
Figure 27. Satellite image of 45KT1484 within project location.

[*figure redacted due to sensitive information*]
Figure 28. Satellite image of 45KT2092 within project location.

[*figure redacted due to sensitive information*]
Figure 29. Satellite image of 45KT2096 within project location.

[*figure redacted due to sensitive information*]
Figure 30. Satellite image of 45KT2098 within project location.

[*figure redacted due to sensitive information*]
Figure 31. Satellite image of 45KT2099 within project location.

[*figure redacted due to sensitive information*]
Figure 32. Satellite image of 45KT2139 within project location.

[*figure redacted due to sensitive information*]
Figure 33. Satellite image of 45KT2140 within project location.

[*figure redacted due to sensitive information*]
Figure 34. Satellite image of 45KT2141 within project location.

[*figure redacted due to sensitive information*]
Figure 35. Satellite image of 45KT2146 within project location.

[*figure redacted due to sensitive information*]
Figure 36. Satellite image of 45KT3331 within project location.

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Figure 37. Satellite image of 45KT3332 within project location.

6.0 Mitigation Measures

Although no significant impacts on cultural resources have been identified with development of the SEIS alternatives, the following mitigation measures should be implemented in order to reduce or eliminate potential impacts to significant cultural resources:

- Consultation with DAHP and Confederated Tribes and Bands of the Yakama Nation (Yakama Nation) would continue.

- Compliance with all state regulations (e.g., RCW 27.44, RCW 27.53, SEPA) related to cultural resources would continue. This includes following state law regarding the need for any disturbance to archaeological sites with objects that pre-date the historic era (i.e. precontact archaeological sites) or to historic archaeological resources that are eligible for or listed in the NRHP to be conducted under an Archaeological Site Alteration Permit from DAHP. Alterations to a site can include adding fill, building on, removing trees, using heavy equipment on, compacting, or other activities that would change or potentially impact the site, as well as archaeological excavations.

- An inadvertent discovery plan would be adopted for the project and made available onsite during construction.

- Onsite monitoring by a professional archaeologist or cultural resources specialist will take place during all ground disturbing activities with potential to intersect Holocene

deposits, which were observed up to 8.5 feet below surface, including clearing, grubbing, grading, and construction excavations.

- Construction personnel would be trained on the identification of archaeological resources.

- When the 25-acre property contemplated for future commercial use is proposed to be developed, a field investigation of the property should be conducted.

Should any potentially significant archaeological sites be discovered and it is not possible to avoid them, impacts would be generated. However, it is expected that these impacts could potentially be minimized through development and implementation of additional mitigation measures appropriate to the nature and extent of discovered sites. In the event that ground disturbing or other activities do result in the inadvertent discovery of archaeological deposits, work should be halted in the immediate area and contact made with DAHP. Work should be halted until such time as further investigation and appropriate consultation is concluded. In the unlikely event of the inadvertent discovery of human remains, work should be immediately halted in the area, the discovery covered and secured against further disturbance, and contact effected with law enforcement personnel, consistent with the provisions set forth in RCW 27.44.055 and RCW 68.60.055. Attachment E outlines protocols for inadvertent discoveries in detail.

7.0 Limitations of this Assessment

No cultural resources study can wholly eliminate uncertainty regarding the potential for prehistoric sites, historic properties or traditional cultural properties to be associated with a project. The information presented in this report is based on professional opinions derived from our analysis and interpretation of available documents, records, literature, and information identified in this report, and on our field investigation and observations as described herein. Conclusions and recommendations presented apply to project conditions existing at the time of our study and those reasonably foreseeable. The data, conclusions, and interpretations in this report should not be construed as a warranty of subsurface conditions described in this report. They cannot necessarily apply to site changes of which CRC is not aware and has not had the opportunity to evaluate.

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Attachment A. Project Correspondence Between CRC and Yakama Nation.

Cultural Resource Consultants

November 13, 2019

Confederated Tribes and Bands of the Yakama Nation
Mr. Johnson Meninick
PO Box 151
Toppenish, WA 98948

Re: Cultural Resources Assessment for the 47º North Project, Cle Elum, Kittitas County, WA

Dear Johnson:

I am writing to inform you of a cultural resources assessment for the above referenced project and to seek additional information about the project area the Tribe may have that is not readily available through other written sources. This letter is on a technical staff-to-technical staff basis to inquire about project-related cultural information or concerns. It is not intended as formal government-to-government consultation to be initiated by the appropriate regulatory agency.

The approximately 824-acre 47º North project is located in the western portion of the City of Cle Elum. In 2002, the Cle Elum UGA EIS was issued. Subsequently, the 47º North Master Site Plan was approved, and Subarea Plan, Zoning, and Development Agreement adopted. Sun Communities is proposing revisions to the 47º North Master Site Plan, including changes in the type but not the number of residential units, and modifications to the employment uses, open space, and access locations. Some of these revisions constitute Major Modifications to the approved Master Plan. As a result, the City of Cle Elum has determined that a SEIS is required, supplementing the 2002 Cle Elum UGA EIS.

We are in the process of reviewing available information. Background research will include a site files search at the Washington State Department of Archaeology and Historic Preservation, review of previously recorded cultural resource reports, and review of pertinent published literature and ethnographies. Results of our investigations will be presented in a technical memo.

We are aware that not all information is contained within published sources. Should the Tribe have additional information to support our assessment, we would very much like to include it in our study. Please contact me at sonja@crcwa.com or 360-395-8879 should you wish to provide any comments. I appreciate your assistance in this matter and look forward to hearing from you.

Sincerely,

Sonja Kleinschmidt
Projects Manager

CULTURAL RESOURCE CONSULTANTS, LLC. 1416 NW 46TH ST, STE 105 PMB346, SEATTLE, WA 98107
PHONE 206.855.9020 - sonja@crcwa.com

Attachment B. Archaeological Monitoring Logs.

DAILY ARCHAEOLOGICAL MONITORING LOG
47ºN PROJECT, CLE ELUM, WA
GEOTECH TESTING ARCHAEOLOGICAL MONITORING
CRC PROJECT NO. 1910A-1

TIME AND DATE: October 21, 2019

MONITOR: Nicole Clennon

PROJECT COMPONENT MONITORED: Excavation of EP1, EP2, EP3, EP4, EP5, EP6, EP7, EP8, EP9, and EP10.

GENERAL FIELD CONDITIONS: Approximately 45º, rainy, and overcast. Surface conditions consisted primarily of a dense forest floor with few dirt trails and roads .

ARCHAEOLOGY OBSERVED: None.

NARRATIVE: The archaeologist arrived on site along with two geologists from Associated Earth Sciences Incorporated, Tim Peter and Tyler Gilsdorf, and one excavator. Monitoring components for the day included ten trench locations. All trench locations were well away from previously recorded eligible archaeological sites. Prior to subsurface testing the archaeologist examined the surface and surrounding vicinity for archaeological material; none were observed.

Exploratory pit excavations consisted of the extraction of sediment with a backhoe in order to determine the subsurface conditions of the project location.

No archaeological or historical materials were observed. No shell, charcoal, fire-cracked rock, woody debris nor any other indications that would indicate the presence of buried archaeological deposits or materials were observed from the geotechnical samples.

FIGURES



Figure 1. Overview of the typical conditions in geotechnical trench location as observed in EP-2, view to the northeast.



Figure 2. Overview of the typical conditions in geotechnical trench location as observed in EP-4, view to the north.

Table 1. Depositional context observed in EP-1 (UTM Zone 10 652310 m E, 5228400 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-3.5	Yellow brown silt (loess)
3.5-14	Yellow brown unsorted glacial till

Table 2. Depositional context observed in EP-2 (UTM Zone 10 652363 m E, 5228241 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-13	Yellow brown unsorted glacial till

Table 3. Depositional context observed in EP-3 (UTM Zone 10 652236 m E, 5228123 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-2.5	Yellow brown silt (loess)
3.5-14	Yellow brown unsorted glacial till

Table 4. Depositional context observed in EP-4 (UTM Zone 10 652012 m E, 5228092 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-5.5	Yellow brown silt (loess)
5.5-13	Yellow brown glacial outwash

Table 5. Depositional context observed in EP-5 (UTM Zone 10 651830 m E, 5228302 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-6	Yellow brown silt (loess)
6-13	Yellow brown unsorted glacial till

Table 6. Depositional context observed in EP-6 (UTM Zone 10 651850 m E, 5228133 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-4	Yellow brown silt (loess)
4-14	Yellow brown glacial till

Table 7. Depositional context observed in EP-7 (UTM Zone 10 651615 m E, 5228369 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-8.5	Yellow brown silt (loess)
8.5-13	Yellow brown glacial till

Table 8. Depositional context observed in EP-8 (UTM Zone 10 651470 m E, 5228529 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-5	Yellow brown silt (loess)
5-12	Yellow brown glacial outwash

Table 9. Depositional context observed in EP-9 (UTM Zone 10 651674 m E, 5228619 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-5.5	Yellow brown silt (loess)
5.5-11	Yellow brown glacial till

Table 10. Depositional context observed in EP-10 (UTM Zone 10 651774 m E, 5228427 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-7	Yellow brown silt (loess)
7-10	Yellow brown glacial till



Figure 3. Representative photograph of the subsurface conditions observed in EP-2.



Figure 4. Representative photograph of the subsurface conditions observed in EP-4.

DAILY ARCHAEOLOGICAL MONITORING LOG
47ºN PROJECT, CLE ELUM, WA
GEOTECH TESTING ARCHAEOLOGICAL MONITORING
CRC PROJECT NO. 1910A-1

TIME AND DATE: October 22, 2019

MONITOR: Nicole Clennon

PROJECT COMPONENT MONITORED: Excavation of EP11, EP12, EP13, EP14, EP15, EP16, EP17, EP18, EP19, EP20, EP21, EP22, EP23, EP24, EP25, EP26, EP27, and EP28.

GENERAL FIELD CONDITIONS: Approximately 55º and sunny. Surface conditions consisted primarily of a dense forest floor with few dirt trails and roads .

ARCHAEOLOGY OBSERVED: None.

NARRATIVE: The archaeologist arrived on site along with two geologists from Associated Earth Sciences Incorporated, Tim Peter and Tyler Gilsdorf, and two excavators. Monitoring components for the day included eighteen trench locations. All trench locations were well away from previously recorded eligible archaeological sites. Prior to subsurface testing the archaeologist examined the surface and surrounding vicinity for archaeological material; none were observed.

Exploratory pit excavations consisted of the extraction of sediment with a backhoe in order to determine the subsurface conditions of the project location.

No archaeological or historical materials were observed. No shell, charcoal, fire-cracked rock, woody debris nor any other indications that would indicate the presence of buried archaeological deposits or materials were observed from the geotechnical samples.

FIGURES



Figure 1. Overview of the typical conditions at geotechnical trench location EP-14, view to the northeast.



Figure 2. Overview of the typical conditions at geotechnical trench location EP-28, view to the south.

Table 1. Depositional context observed in EP-11 (UTM Zone 10 651901 m E, 5228660 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-2	Yellow brown silt (loess)
2-12	Yellow brown unsorted glacial till

Table 2. Depositional context observed in EP-12 (UTM Zone 10 652113 m E, 5228476 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-2.5	Brown loam (topsoil)
2.5-16.5	Yellow brown glacial till

Table 3. Depositional context observed in EP-13 (UTM Zone 10 652052 m E, 5228281 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1.5	Brown loam (topsoil)
1-9	Yellow brown glacial outwash
9-10	Yellow brown unsorted glacial till
10-15	Glacial outwash

Table 4. Depositional context observed in EP-14 (UTM Zone 10 652044 m E, 5227864 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-3	Yellow brown silt (loess)
3-8	Yellow brown glacial till

Table 5. Depositional context observed in EP-15 (UTM Zone 10 652439 m E, 5228460 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-2	Brown loam (topsoil)
2-3	Bedrock

Table 6. Depositional context observed in EP-16 (UTM Zone 10 652575 m E, 5228609 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1.5	Brown loam (topsoil)
1.5-14	Yellow brown glacial outwash

Table 7. Depositional context observed in EP-17 (UTM Zone 10 652704 m E, 5228766 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1.5	Brown loam (topsoil)
1.5-4	Yellow brown silt (loess)
4-15	Glacial outwash

Table 8. Depositional context observed in EP-18 (UTM Zone 10 652529 m E, 5228846 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1.5	Brown loam (topsoil)
1.5-4	Yellow brown silt (loess)
4-15	Yellow brown glacial outwash

Table 9. Depositional context observed in EP-19 (UTM Zone 10 652332 m E, 5228717 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1.5-4	Yellow brown silt (loess)
4-15	Yellow brown glacial outwash

Table 10. Depositional context observed in EP-20 (UTM Zone 10 652065 m E, 5228646 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-7	Yellow brown silt (loess)
7-10	Yellow brown glacial till

Table 11. Depositional context observed in EP-21 (UTM Zone 10 651920 m E, 5228808 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-2	Yellow brown silt (loess)
2-15	Glacial outwash

Table 12. Depositional context observed in EP-22 (UTM Zone 10 652118 m E, 5228943 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-2	Brown loam (topsoil)
2-15	Yellow brown glacial outwash

Table 13. Depositional context observed in EP-23 (UTM Zone 10 652110 m E, 5228781 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-3	Yellow brown silt (loess)
3-14	Yellow brown glacial outwash

Table 14. Depositional context observed in EP-24 (UTM Zone 10 652471m E, 5229116 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1.5	Brown loam (topsoil)
1.5-4	Yellow brown silt (loess)
4-14	Yellow brown glacial outwash

Table 15. Depositional context observed in EP-25 (UTM Zone 10 652677 m E, 5228982 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-2	Brown loam (topsoil)
2-14	Glacial outwash

Table 16. Depositional context observed in EP-26 (UTM Zone 10 652978 m E, 5228858 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-2	Brown loam (topsoil)
2-3	Yellow brown silt (loess)
3-15	Yellow brown glacial outwash

Table 17. Depositional context observed in EP-27 (UTM Zone 10 652304 m E, 5228629 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-3	Yellow brown silt (loess)
3-14	Yellow brown glacial outwash

Table 18. Depositional context observed in EP-28 (UTM Zone 10 652868 m E, 5229115 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-2	Yellow brown silt (loess)
2-14.5	Yellow brown glacial till



Figure 3. Representative photograph of the subsurface conditions observed in EP-14.



Figure 4. Representative photograph of the subsurface conditions observed in EP-28.

DAILY ARCHAEOLOGICAL MONITORING LOG
47ºN PROJECT, CLE ELUM, WA
GEOTECH TESTING ARCHAEOLOGICAL MONITORING
CRC PROJECT NO. 1910A-1

TIME AND DATE: October 23, 2019

MONITOR: Nicole Clennon

PROJECT COMPONENT MONITORED: Excavation of EP29, EP30, EP31, EP32, EP33, EP34, EP35, EP36, EP37, EP38, and EP39.

GENERAL FIELD CONDITIONS: Approximately 32º and sunny. Surface conditions consisted primarily of a dense forest floor with few dirt trails and roads .

ARCHAEOLOGY OBSERVED: None.

NARRATIVE: The archaeologist arrived on site along with two geologists from Associated Earth Sciences Incorporated, Tim Peter and Tyler Gilsdorf, and one excavator. Monitoring components for the day included eleven trench locations. All trench locations were well away from previously recorded eligible archaeological sites. Prior to subsurface testing the archaeologist examined the surface and surrounding vicinity for archaeological material; none were observed.

Exploratory pit excavations consisted of the extraction of sediment with a backhoe in order to determine the subsurface conditions of the project location.

No archaeological or historical materials were observed. No shell, charcoal, fire-cracked rock, woody debris nor any other indications that would indicate the presence of buried archaeological deposits or materials were observed from the geotechnical samples.



Figure 1. Overview of the typical conditions in geotechnical boring location EP-33, view to the north.



Figure 2. Overview of the typical conditions at geotechnical trench location EP-39, view to the southeast.

Table 1. Depositional context observed in EP-29 (UTM Zone 10 652949 m E, 5229344 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-3.5	Yellow brown silt (loess)
3.5-14.5	Yellow brown silty glacial outwash

Table 2. Depositional context observed in EP-30 (UTM Zone 10 653154 m E, 5229240 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-2	Yellow brown silt (loess)
2-15	Yellow brown glacial till

Table 3. Depositional context observed in EP-31 (UTM Zone 10 653167m E, 5228940 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-2	Brown loam (topsoil)
2-16	Yellow brown glacial outwash

Table 4. Depositional context observed in EP-32 (UTM Zone 10 653348 m E, 5229087 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-2.5	Yellow brown silt (loess)
2.5-14	Yellow brown glacial outwash

Table 5. Depositional context observed in EP-33 (UTM Zone 10 653507 m E, 5229274. m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Gray brown silt loam (topsoil)
1-2	Brown silt loam (topsoil)
2-16	Glacial outwash

Table 6. Depositional context observed in EP-34 (UTM Zone 10 653896 m E, 5229145 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1.5	Brown loam (topsoil)
1.5-16	Yellow brown glacial outwash

Table 7. Depositional context observed in EP-35 (UTM Zone 10 654090 m E, 5229128 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1	Brown loam (topsoil)
1-17	Glacial outwash

Table 8. Depositional context observed in EP-36 (UTM Zone 10 654270 m E, 5229264 m N)

Depth below surface of core sample extracted (feet)	**Observed sediments**
0-1.5	Brown loam (topsoil)
1.5-15	Yellow brown glacial outwash

Table 9. Depositional context observed in EP-37 (UTM Zone 10 653929 m E, 5229297 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-3	Yellow brown silt (loess)
3-13	Yellow brown glacial outwash

Table 10. Depositional context observed in EP-38 (UTM Zone 10 653780 m E, 5229388 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-14	Yellow brown glacial outwash

Table 11. Depositional context observed in EP-39 (UTM Zone 10 653378 m E, 5229422 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-2	Brown loam (topsoil)
2-15	Yellow brown glacial outwash



Figure 3. Representative photograph of the subsurface conditions observed in EP-33.



Figure 4. Representative photograph of the subsurface conditions observed in EP-39.

DAILY ARCHAEOLOGICAL MONITORING LOG
47ºN PROJECT, CLE ELUM, WA
GEOTECH TESTING ARCHAEOLOGICAL MONITORING
CRC PROJECT NO. 1910A-1

TIME AND DATE: October 24, 2019

MONITOR: Nicole Clennon

PROJECT COMPONENT MONITORED: Excavation of EP40, EP41, EP42, EP43, EP44, EP45, EP46, and EP47.

GENERAL FIELD CONDITIONS: The temperature was between 34 and 50 ºF and sunny. Surface conditions consisted primarily of a dense forest floor with few dirt trails and roads .

ARCHAEOLOGY OBSERVED: None.

NARRATIVE: The archaeologist arrived on site along with two geologists from Associated Earth Sciences Incorporated, Tim Peter and Tyler Gilsdorf, and one excavator. Monitoring components for the day included eight test trenches. All trench locations were well away from previously recorded eligible archaeological sites. Prior to subsurface testing the archaeologist examined the surface and surrounding vicinity for archaeological material; none were observed.

Exploratory pit excavations consisted of the extraction of sediment with a backhoe in order to determine the subsurface conditions of the project location.

No archaeological or historical materials were observed. No shell, charcoal, fire-cracked rock, woody debris nor any other indications that would indicate the presence of buried archaeological deposits or materials were observed from the geotechnical samples.



Figure 1. Overview of the typical conditions at geotechnical trench location EP-45, view to the southwest.



Figure 2. Overview of the typical conditions at geotechnical trench location EP-47, view to the west.

Table 1. Depositional context observed in EP-40 (UTM Zone 10 652287 m E, 5228533 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-4	Yellow brown silt (loess)
4-12.5	Yellow brown glacial till

Table 2. Depositional context observed in EP-41 (UTM Zone 10 652450 m E, 5228475 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-6	Yellow brown silt (loess)
6-15	Yellow brown glacial till

Table 3. Depositional context observed in EP-42 (UTM Zone 10 652405 m E, 5228556 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-2	Yellow brown silt (loess)
2-14	Yellow brown glacial till

Table 4. Depositional context observed in EP-43 (UTM Zone 10 652405 m E, 5228560 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-2	Yellow brown silt (loess)
2-14	Yellow brown glacial outwash

Table 5. Depositional context observed in EP-44 (UTM Zone 10 652218 m E, 5228626. m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1.5	Brown silt loam (topsoil)
1.5-15	Glacial till

Table 6. Depositional context observed in EP-45 (UTM Zone 10 651896 m E, 5228735 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-4	Yellow brown silt (loess)
4-15.5	Yellow brown glacial outwash

Table 7. Depositional context observed in EP-46 (UTM Zone 10 651771 m E, 5228732 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1	Brown loam (topsoil)
1-3.5	Yellow brown silt (loess)
3.5-15	Glacial outwash

Table 8. Depositional context observed in EP-47 (UTM Zone 10 651623 m E, 5228477 m N)

Depth below surface of core sample extracted (feet)	Observed sediments
0-1.5	Brown loam (topsoil)
1.5-2.5	Yellow brown silt (loess)
2.5-13	Yellow brown glacial outwash



Figure 3. Representative photograph of the subsurface conditions observed in EP-45.



Figure 4. Representative photograph of the subsurface conditions observed in EP-47.

Attachment C. State of Washington Archaeological Site Inventory Form Updates, 45KT2092 and 45KT2098.

[*redacted due to sensitive information*]

Attachment D. Archaeological Shovel Probe Investigations.

Probe #	Location (WGS84 UTM Zone 10, +/- 3 meters)	Stratigraphic Description (depths are centimeters below surface [cmbs])	Cultural Materials Found
1	652670 m E, 5229429 m N	0-15: Duff and dark brown sandy loam with ~30% gravels and pebbles (Topsoil); 15-44: Dark red-brown silty, sandy, loam with gravels, pebbles, and cobbles increasing with depth, up to 50% (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
2	652771 m E, 5229406 m N	0-8: 0-15: Duff and dark brown sandy loam with ~30% gravels and pebbles (Topsoil); 8-75: Dark red-brown silty, sandy, loam with ~15-40% gravels, pebbles, and cobbles with increasing with depth (Pleistocene sediments). Terminated on cobble obstruction in Pleistocene sediments.	None.
3	652924 m E, 5229432 m N	0-10: Duff and dark brown sandy loam with ~20% gravels and pebbles (Topsoil); 10-68: Dark red-brown silty, sandy, loam with gravels, pebbles, and cobbles increasing with depth, up to 50% (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
4	652844 m E, 5229563 m N	0-11: Duff and dark brown sandy loam (Topsoil); 11-69: Dark red-brown silty, sandy, loam with ~20% gravels, pebbles, and cobbles (Pleistocene sediments). Terminated at rock obstruction in Pleistocene sediments.	None.
5	652746 m E, 5229217m N	0-10: Duff and dark brown sandy loam with ~20% gravels and pebbles (Topsoil); 10-75: Dark red-brown silty, sandy, loam with gravels and pebbles increasing with depth, up to 85% (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
6	652410 m E, 5229018 m N	0-5: Duff and dark brown sandy loam (Topsoil); 5-35: Orange-brown sandy loam with ~75% gravels, pebbles, and cobbles (Pleistocene sediments). Terminated at rock and root obstruction in Pleistocene sediments.	None.
7	652323 m E, 5228890 m N	0-20: Duff and dark brown sandy loam with ~15% gravels and pebbles (Topsoil); 20-50: Red-brown silty, sandy, loam with gravels and pebbles increasing with depth, up to 80% (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
8	652199 m E, 5228789 m N	0-8: Duff and brown sandy loam (Topsoil); 8-40: Yellow brown sandy loam with up to 20% gravels and pebbles (Holocene loess); 40-60: Yellow brown sandy loam with 40% gravels, pebbles, and many cobbles (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
9	652227 m E, 5228611 m N	0-3: Duff 3-22: Dark brown sandy loam with ~80% gravels, pebbles, and cobbles (Pleistocene sediments). Terminated at rock obstruction in Pleistocene sediments.	None.
10	652468 m E, 5228684 m N	0-5: Duff and brown sandy loam (Topsoil); 5-35: Yellow brown sandy loam with ~ 10% gravels and pebbles (Holocene loess); 35-55: Compact yellow brown sandy loam with 25% gravels, pebbles, and cobbles (Glacial till). Terminated in Pleistocene sediments.	None.

Probe #	Location (WGS84 UTM Zone 10, +/- 3 meters)	Stratigraphic Description (depths are centimeters below surface [cmbs])	Cultural Materials Found
11	652286 m E, 5228489 m N	0-11: Duff and dark brown sandy loam (Topsoil) 11-32: Dark yellow brown sandy loam with ~60% gravels, pebbles, and cobbles (primarily gravels) (Pleistocene sediments). Terminated at rock obstruction in Pleistocene sediments.	None.
12	652319 m E, 5228251 m N	0-5: Duff and brown sandy loam (Topsoil); 5-35: Yellow brown sandy loam with ~ 10% gravels and pebbles (Holocene loess); 35-52: Compact yellow brown sandy loam with 40% gravels, pebbles, and cobbles (Glacial till). Terminated in Pleistocene sediments.	None.
13	652116 m E, 5228159 m N	0-12: Duff and dark brown sandy loam (Topsoil) 12-67: Yellow brown sandy loam with 20-50% gravels and pebbles (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
14	651840 m E, 5228224 m N	0-5: Duff and brown sandy loam (Topsoil); 5-60: Yellow brown sandy loam with ~10% gravels and pebbles (Holocene loess); 60-80: Compact yellow brown sandy loam with 40% gravels and pebbles (Glacial till). Terminated in Pleistocene sediments.	None.
15	651676 m E, 5228501 m N	0-15: Duff and brown sandy loam (Topsoil); 15-100: Yellow brown sandy loam with 10-15% gravels and pebbles (Holocene loess). Terminated at extent of shovel.	None.
16	651831 m E, 5228710 m N	0-10: Duff and brown sandy loam (Topsoil); 10-60: Yellow brown sandy loam with ~10% gravels and pebbles (Holocene loess); 60-80: Compact yellow brown sandy loam with 50% gravels, pebbles, and cobbles (Glacial till). Terminated in Pleistocene sediments.	None.
17	654204 m E, 5228917 m N	0-15: Duff and dark brown sandy loam (Topsoil) 15-68: Compact yellow brown sandy loam with 30-80% gravels and pebbles increasing with depth (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
18	654195 m E, 5229047 m N	0-8: Duff and brown sandy loam (Topsoil); 8-20: Yellow brown sandy loam with 10-30% gravels and pebbles (Holocene loess); 20-40: Yellow brown sandy loam with 30-80% gravels, pebbles, and cobbles (Glacial till). Root obstruction starting at 35 cmbs. Terminated in Pleistocene sediments.	None.
19	654046 m E, 5229002 m N	0-15: Duff and dark brown sandy loam (Topsoil) 15-68: Compact yellow brown sandy loam with 30-50% gravels and pebbles increasing with depth (Pleistocene sediments). Terminated in Pleistocene sediments.	None.
20	654085 m E, 5228873 m N	0-10: Duff and brown sandy loam (Topsoil); 10-55: Yellow brown sandy loam with 15-30% gravels and pebbles (Pleistocene sediments). Terminated at large root obstruction.	None.
21	650890.00 m E, 5228425.00 m N	0-6: Duff and dark brown sandy loam (Topsoil) 6-48: Compact yellow brown sandy loam with 80% gravels and pebbles (Pleistocene sediments). Terminated at rock obstruction in Pleistocene sediments.	None.

Probe #	Location (WGS84 UTM Zone 10, +/- 3 meters)	Stratigraphic Description (depths are centimeters below surface [cmbs])	Cultural Materials Found
22	651418 m E, 5228198 m N	0-8: Duff and dark brown sandy loam (Topsoil) 8-65: Yellow brown sandy loam with 50-80% gravels, pebbles, and cobbles increasing with depth (Pleistocene sediments). Terminated at cobble obstruction in Pleistocene sediments.	None.
23	651994 m E, 5228103 m N	0-8: Duff and dark brown sandy loam (Topsoil) 8-61: Yellow brown sandy loam with 20-60% gravels, pebbles, and cobbles increasing with depth (Pleistocene sediments). Terminated in Pleistocene sediments.	None.

Attachment E. Inadvertent discovery protocol.

The following protocols outline procedures to follow, in accordance with state and federal laws, if archaeological materials or human remains are discovered.

Protocols for Discovery of Archaeological Resources

The Archaeological Sites and Resources Act (RCW 27.53) prohibits knowingly disturbing archaeological sites without a permit from the Washington State Department of Archaeology and Historic Preservation (DAHP), and the Indian Graves and Records Act (RCW 27.44) prohibits knowingly disturbing Native American or historic graves.

In the event that archaeological resources are encountered during project implementation, the following actions will be taken:

In work areas, all ground disturbing activity at the location will stop, and the work supervisor will be notified immediately. The work site will be secured from any additional impacts and the supervisor will be informed.

The project proponent will immediately contact the agencies with jurisdiction over the lands where the discovery is located, if appropriate. The appropriate agency archaeologist or the proponent's contracting archaeologist will determine the size of the work stoppage zone or discovery location in order to sufficiently protect the resource until further decisions can be made regarding the work site.

The project proponent will consult with DAHP regarding the evaluation of the discovery and the appropriate protection measures, if applicable. Once the consultation has been completed, and if the site is determined to be NRHP-eligible, the project proponent will request written concurrence that the agency or tribe(s) concurs that the protection and mitigation measures have been fulfilled. Upon notification of concurrence from the appropriate parties, the project proponent will proceed with the project.

Within six months after completion of the above steps, the project proponent will prepare a final written report of the discovery. The report will include a description of the contents of the discovery, a summary of consultation, and a description of the treatment or mitigation measures.

Protocols for Discovery of Human Remains

If human remains are found within the project location, the project proponent, its contractors or permit-holders, the following actions will be taken, consistent with Washington State RCWs 68.50.645, 27.44.055, and 68.60.055:

If ground-disturbing activities encounter human skeletal remains, then all activity will cease that may cause further disturbance to those remains. The area of the find will be secured and protected from further disturbance. The project proponent will prepare a plan for securing and protecting exposed human remains and retain consultants to perform these services. The finding of human skeletal remains will be reported to the county medical examiner/coroner and local law enforcement in the most expeditious manner possible. The remains will not be touched, moved, or further disturbed. The county medical examiner/coroner will assume jurisdiction over the

human skeletal remains and make a determination of whether those remains are forensic or non-forensic. If the county medical examiner/coroner determines the remains are non-forensic, then they will report that finding to DAHP, which will then take jurisdiction over the remains. DAHP will notify any appropriate cemeteries and all affected tribes of the find. The State Physical Anthropologist will make a determination of whether the remains are Indian or Non-Indian and report that finding to any appropriate cemeteries and the affected tribes. DAHP will then handle all consultation with the affected parties as to the future preservation, excavation, and disposition of the remains.

Contact Information

Confederated Tribes and Bands of the Yakama Nation
PO Box 151
Toppenish, WA 98948
Primary Contact: Kate Valdez, THPO, 509-985-7596, or Johnson Meninick, Cultural Resources, 509-685-7203

Washington Department of Archaeology and Historic Preservation
PO Box 48343
Olympia, WA 98504-8343
Lead Representative: Allyson Brooks, State Historic Preservation Officer, office: 360-586-3066
Primary Contact: Stephanie Jolivette, Local Government Archaeologist, office: 360-586-3088, cell: 360-628-2755
Primary Contact for Human Remains: Guy Tasa, State Physical Anthropologist, office: 360-586-3534, cell: 360-790-1633

Kittitas County Coroner's Office
507 North Nanum Street, Suite 113
Ellensburg, WA 98926
Lead Representative: Nick Henderson, Coroner, 509-933-8200

Kittitas County Sheriff's Office
307 West Umptanum Rd
Ellensburg, WA 98926
Lead Representative: Gene Dana, Sheriff, 509-962-7525

Appendix C

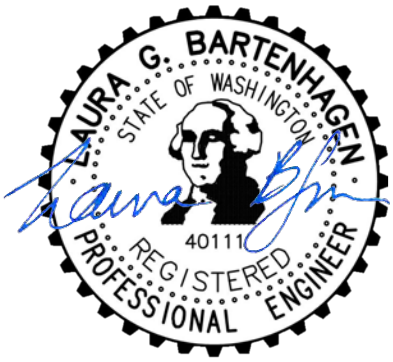
UPDATED SUPPLEMENTAL SITE ENGINEERING TECHNICAL REPORT

Supplement to the Site Engineering Technical Report for 47° North

Revised April 16, 2021

Prepared for

Sun Communities, Inc.
27777 Franklin Road, Suite 200
Southfield, MI 48034



04/16/2021

Submitted by

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Table of Contents

Introduction ..... **v**

Section 1 Site Information **1-1**

1.1 Clearing, Grading, and Impervious Area Information 1-1

1.1.1 Project Clearing 1-1

1.1.2 Site Grading 1-2

1.2 Imported Materials 1-3

1.3 Site Information Summary 1-4

Section 2 Stormwater **2-1**

2.1 Hydrology 2-1

2.1.1 Hydrologic Model 2-1

2.1.2 Hydrologic Model Comparison 2-1

2.1.3 HSPF to MSRTS 2-2

2.2 Existing Conditions 2-3

2.2.1 Soil Type 2-5

2.2.2 Cover 2-5

2.2.3 Slope 2-5

2.3 Developed Conditions 2-10

2.4 Flow Control, Water Quality Treatment, and Conveyance Methodology 2-15

2.4.1 Flow Control 2-15

2.4.2 Water Quality Treatment 2-15

2.4.3 Conveyance 2-18

2.4.4 Overflow Routes 2-18

2.5 Developed Condition Summary 2-18

2.6 Water Quality Analysis 2-18

2.6.1 Hydrologic Setting 2-19

2.6.2 Surface Water Quality 2-19

2.6.3 The Water Quality Assessment and the 303(d) List 2-22

2.6.4 Stormwater Runoff National Pollutant Discharge Elimination System (NPDES) Permit 2-22

2.7 Stormwater Summary 2-23

Section 3 Preliminary Water Plans **3-1**

3.1 System Capacity Requirements 3-1

3.2 Treated (Domestic) Water Requirements 3-1

3.2.1 Single Family and Multi-Family 3-1

3.2.2 Commercial Development 3-2

3.2.3 RV Park Guests 3-2

3.2.4 Amenity and Adventure Center Guests 3-2

3.2.5 Outside Water Demands 3-2

3.2.6 Equivalent Residential Unit (ERU) Demands 3-5

3.2.7 Fire Flows 3-5

3.3 Untreated Water Requirements 3-5

3.4 Water Use Standards 3-5

3.5 Source of Water Supply 3-5

3.6 Preliminary Water Distribution System Plan 3-6
3.6.1 Pressure Zones 3-9
3.6.2 Treated Water Storage 3-9
3.6.3 Distribution Mains 3-9
3.7 Water Use Standards 3-9
3.8 Preliminary Water Plans Summary 3-9
Section 4 Preliminary Sewer Plans 4-1
4.1 Wastewater Flow Projections 4-1
4.2 Collection and Conveyance System 4-5
4.3 Wastewater Treatment and Disposal 4-6
4.3.1 Flows and Loadings 4-6
4.4 Wastewater Treatment and Disposal Alternatives 4-7
4.5 Preliminary Sewer Plans Summary 4-8
Section 5 Solid Wastes 5-1
5.1 Solid Waste Sources and Classifications 5-1
5.1.1 Construction and Demolition Debris (C&D): 5-1
5.1.2 Residential 5-1
5.1.3 Commercial 5-1
5.1.4 Streets and Recreation Areas 5-1
5.1.5 Water and Wastewater Treatment 5-1
5.2 Classification of Solid Wastes 5-1
5.2.1 Construction and Demolition Debris (C&D) 5-1
5.2.2 Municipal Wastes 5-2
5.2.3 Hazardous/Moderate Risk Wastes 5-2
5.2.4 Biosolids/Septage 5-2
5.2.5 Yard Waste 5-3
5.2.6 Land Clearing 5-3
5.3 Waste Stream Quantities and Management 5-3
5.3.1 C&D Waste Generation Estimate 5-3
5.3.2 C&D Management Provisions 5-5
5.3.3 Inert Wastes 5-5
5.3.4 Non-Inert Wastes 5-5
5.3.5 Wood Wastes 5-5
5.3.6 Municipal and Other Wastes 5-5
5.3.7 Management Provisions 5-7
5.3.8 Recycling 5-8
5.3.9 Septage Wastes 5-8
5.3.10 Land Clearing Wastes 5-8
5.3.11 Waste Loading Impacts 5-8
5.3.12 Cle Elum Transfer Station 5-9
5.3.13 Ryegrass Landfill. 5-9
5.3.14 Solid Wastes Projections 5-9
5.4 Solid Wastes Summary 5-9

Tables

Table 1-1: Estimated Cleared and Impervious Areas, Acres [a] 1-2
Table 1-2: Estimated Earthwork Quantities, Cubic Yards 1-3
Table 2-1: Existing Subbasin Soil Types[a] 2-5
Table 2-2: Pre-Developed Condition Subbasin Land-Use/Land Cover[a] 2-6
Table 2-3: Developed Condition Subbasin Land-use/Land Cover, SEIS Alternative 6[a] 2-10
Table 2-4: Impervious and Landscape Area Summaries[a] 2-11
Table 2-5: Typical Seed Mixture 2-17
Table 2-6: Estimated Annual Runoff 2-18
Table 3-1: SEIS Alternative 6 Single Family Residences 3-2
Table 3-2: SEIS Alternative 6 Multi-Family Units 3-2
Table 3-3: Irrigation Requirements 3-3
Table 3-4: Maximum Allowable Irrigation Flows, gpd 3-3
Table 3-5: Avg. Daily Treated Water Demands at Buildout, mgd 3-3
Table 3-6: Avg. Daily Treated Water Demands at Buildout for Commercial Development Demands, mgd 3-3
Table 3-7: Peaking Factors 3-4
Table 3-8: Maximum Month Treated Water Demands 3-4
Table 3-9: Maximum Month Treated Water Demands, Commercial Development Demands 3-4
Table 4-1: Wastewater Generation/Return Flow as a Fraction of Inside Water Demand – SEIS Alternative 6 4-1
Table 4-2: Infiltration/Inflow as a Percentage of Maximum Month Wastewater Production – SEIS Alternative 6 4-1
Table 4-3: Wastewater Generation - Single Family, SEIS Alternative 6 4-2
Table 4-4: Wastewater Generation - Multi-family, SEIS Alternative 6 4-2
Table 4-5: Monthly Wastewater Flow at Buildout, mgd[a] 4-3
Table 4-6: Preliminary SEIS Alternative 6 Lift Station Design Parameters 4-5
Table 4-7: Projected Wastewater Flows for SEIS Alternative 6, mgd[a] 4-6
Table 4-8: Projected Wastewater Flows for FEIS Alternative 5, mgd[a,b] 4-6
Table 4-9: Projected Wastewater Flows for SEIS Alternative 5, mgd[a,b] 4-6
Table 4-10: Projected Loadings, lb. per day[a] 4-7
Table 5-1: Estimated Residential Building Areas 5-3
Table 5-2: Estimated Non-Residential Building Areas 5-4
Table 5-3: Projected C&D Generation Rates and Total Quantity at Full Buildout, tons 5-4
Table 5-4: Solid Waste Production (tons/year) 5-7

Figures

Figure 1-1 Conceptual Grading Plan 1-5
Figure 2-1 Existing Subbasins 2-4
Figure 2-2 Soil Types 2-7
Figure 2-3 Existing Vegetative Cover 2-8
Figure 2-4 Slope Map 2-9
Figure 2-5 Developed Condition Basin Boundaries 2-12
Figure 2-6 Conceptual Storm Drainage Plan 2-13
Figure 3-1 Preliminary Water Plan SEIS Alternative 6 3-8
Figure 4-1 Preliminary Sewer Plan SEIS Alternative 6 4-4

Appendix – HLA Memorandum

Introduction

The purpose of the Supplement to the Site Engineering Technical Report (SETR) for 47° North is to serve as an update to the 2002 SETR by W&H Pacific, Inc., as relevant for the 47° North development. The SETR was completed as Appendix E of the Final Environmental Impact Statement (EIS) for the Trendwest Properties Cle Elum UGA (2002 EIS).

The updates in this supplement consist of evaluating the following alternatives as part of the 47° North Master Site Plan Supplemental Environmental Impact Statement (SEIS):

- SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment
- FEIS Alternative 5 – Original Bullfrog Flats Master Site Plan
- SEIS Alternative 5 (No Action Alternative) – Approved Bullfrog Flats Master Site Plan

The alternatives are compared, relative to the codes in effect at the time of the 2002 UGA EIS for FEIS Alternative 5 and the codes currently in effect for SEIS Alternatives 5 and 6. With each comparison, any new significant impacts will be identified, and mitigation measures proposed.

The Draft SETR will evaluate impacts in the following categories, matching the format of the 2002 SETR:

- Section 1 Site Information, including clearing, grading, and impervious area data
- Section 2 Stormwater, including hydrologic modeling for existing and developed conditions and a water quality analysis
- Section 3 Preliminary Water Plans
- Section 4 Preliminary Sewer Plans
- Section 5 Solid Wastes

1.1 Clearing, Grading, and Impervious Area Information

This section provides estimates of areas to be cleared during construction, impervious areas, and cut and fill earthwork volumes for SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment and compares them to FEIS Alternative 5 and SEIS Alternative 5.

1.1.1 Project Clearing

In order to maintain the natural setting of the project under SEIS Alternative 6, the extent of clearing associated with project construction would be kept to reasonable minimums through project design. Estimated areas to be cleared are presented in **Table 1-1** by type of land use category and compared to FEIS Alternative 5. SEIS Alternative 5 did not include a breakdown of cleared and impervious area, however, the total developed area for SEIS Alternative 5 is 401 acres, which is less than FEIS Alternative 5 cleared area. Therefore, for the purposes of this comparison, the areas under SEIS Alternative 5 and FEIS Alternative 5 are estimated to be the same.

Cleared areas for roads were assumed to be the full road right-of-way over the length of the roads. The connector road right-of-way was assumed to be 70 feet. Cleared areas for other land uses include their respective roadways and were taken as the assumed maximum developed area for each land use. Impervious areas by land use category are also presented in **Table 1-1**.

It should be noted that some of the areas assumed to be cleared and in impervious surfaces differ between the alternatives (public facilities, community recreation center, school expansion, and cemetery expansion) because different assumptions were made for these areas in the 2002 EIS for FEIS Alternative 5, the SEIS Alternative 5, and the current revised plan for SEIS Alternative 6.

Table 1-1: Estimated Cleared and Impervious Areas, Acres [a]

Land Use	SEIS Alternative 6		FEIS & SEIS Alternative 5[b]	
	Area Cleared	Impervious Area	Area Cleared	Impervious Area
Residential	143	71	161	104
Residential Amenity Center	6	5	0	0
Adventure Center	6	5	0	0
Roads	10	8	122	61
Public Facilities	0	0	23	4
Community Recreation Ctr.	0	0	10	6
School Expansion	0	0	17	8
Cemetery Expansion	0	0	8	1
Commercial Development	18	17	62	63
RV Park	146	57	0	0
RV Amenity Center	5	4	0	0
Total	**333**	**167**	**403**	**247**

[a] Note: Numbers may not sum to totals shown due to rounding.
[b] Excludes Reserve Area.

1.1.2 Site Grading

The general considerations for grading throughout the site under SEIS Alternative 6 include the following:

- Clearing limits would be minimized as discussed previously.
- Grading will be performed to provide positive drainage.
- Grading designs would seek reasonable balances of cut and fill by development area phases.
- No excavated materials are expected to be transported off-site.
- Except as discussed in the following sections, no general borrow materials are expected to be imported from off-site sources.
- Excavated topsoil would be stockpiled and reused.
- Erosion and sedimentation control measures would be implemented.

Estimated earthwork quantities are presented in **Table 1-2** under SEIS Alternative 6 (and compared to FEIS Alternative 5 and SEIS Alternative 5). The proposed 47° North development grading under SEIS Alternative 6 is shown on **Figure 1-1**. For SEIS Alternative 6, roadway quantities to subgrade have been determined from a preliminary roadway vertical design based on the horizontal alignments presented in the master site plan. Quantities of cut and fill for other land uses were estimated on the basis of unit area volume procedures for each land use type. The unit area volumes were applied to the assumed maximum development areas estimated for each land use category.

Table 1-2: Estimated Earthwork Quantities, Cubic Yards

Land Use	SEIS Alternative 6		FEIS & SEIS Alternative 5[a]	
	Cut	Fill	Cut	Fill
Residential	126,000	164,000	116,000	75,000
Residential Amenity Center	4,000	14,000	0	0
Adventure Center	3,000	16,000	0	0
Roads	2,000	4,000	79,000	16,000
Public Facilities	0	0	82,000	15,000
Community Recreation Ctr.	0	0	19,000	19,000
School Expansion	0	0	37,000	37,000
Cemetery Expansion	0	0	8,000	16,000
Commercial Development	99,000	2,000	303,000	242,000
RV Park	106,000	108,000	0	0
RV Amenity Center	11,000	2,000	0	0
Total	**351,000**	**310,000**	**644,000**	**420,000**

[a] Excludes Reserve Area.

Stripping volumes for SEIS Alternative 6 are 391,000 cubic yards for an estimated stripping depth of 12 inches. Stripping volumes for FEIS Alternative 5 were not calculated as part of the 2002 EIS SETR.

1.2 Imported Materials

In the event on-site materials are not able to be used for construction, imported materials will be required under SEIS Alternative 6. These materials would include gravel base course and crushed rock base course materials for roadway, parking areas and paved trails; asphalt concrete; and bedding materials for pipelines. The estimated total volume of these materials is 150,000 cubic yards.

Delivery of imported materials under SEIS Alternative 6 would follow the proposed construction schedule for the infrastructure, which is estimated to be 5 to 10 years. Assuming a six-month construction season for site work (May - October), approximately 2,500 to 5,000 cubic yards per month would be delivered to the site. Assuming 12 cubic yard capacity trucks are used, the material importing activities would generate about 210 to 420 truck trips per month.

Some stockpiling of materials on site would be expected such as bedding materials for pipeline construction. Stockpiling would tend to increase daily truck trip volumes above the average daily truck trip volume for the construction season. However, the total truck trip volume for the season would not be expected to change.

1.3 Site Information Summary

The proposed SEIS Alternative 6 development cleared and impervious areas, as well as the cut and fill earthwork volumes, are significantly less than under FEIS Alternative 5 in the 2002 EIS SETR and SEIS Alternative 5. The reason for the reduction in cleared and impervious areas is mostly because the commercial development footprint is significantly smaller. Therefore, less associated impacts are anticipated (e.g., erosion and sedimentation into water resources), and no additional mitigation is proposed other than what is already required by current codes.

FOR CONTINUATION SEE SHEET 2 OF 2

BULLFROG ROAD

SECONDARY ENTRY

ADVENTURE CENTER

MUNICIPAL RECREATION CENTER SITE

CLE ELUM – ROSLYN SCHOOL DISTRICT 404

EXISTING HIGH SCHOOL

EXISTING ELEMENTARY AND MIDDLE SCHOOL

MANUFACTURED HOUSING

POND

AMENITY CENTER

IRRIGATION PUMP STATION

COMMUNICATIONS

POWER STATION

MULTI–FAMILY

WASHINGTON STATE HORSE PARK

CITY OF CLE ELUM WATER TREATMENT PLANT

PRIMARY ENTRY

SR-903

BUSINESS PARK

25' SETBACK FOR CLEARING AND GRADING FROM 25% SLOPE (TYP)

CEMETERY EXPANSION

EXISTING CEMETERY

INTERSTATE 90

YAKIMA RIVER

SCALE: 1" = 200'

200 100 0 200 400

CONTOUR INTERVAL = 2'

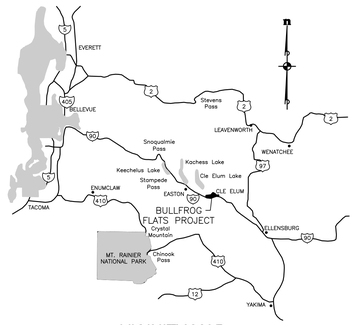
PRELIMINARY GRADING VOLUMES

RESIDENTIAL UNITS & BUSINESS PARK
CUT: 234,068 CY
FILL: 199,435 CY
NET: 34,633 CY (CUT)

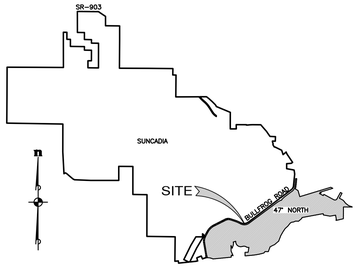
12" STRIPPING: 252,333 CY

RV & REC–1 UNITS
CUT: 116,741 CY
FILL: 110,122 CY
NET: 6,619 CY (CUT)

12" STRIPPING: 138,389 CY



VICINITY MAP
NOT TO SCALE



KEY MAP
NOT TO SCALE

47°N
RV RESORT & RESIDENCES

REVISIONS

NO.	DESCRIPTION/DATE	BY

ESM CONSULTING ENGINEERS, LLC
33400 8th Ave S, Suite 205
Federal Way, WA 98003
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(425) 837-9900
FEDERAL WAY
EVERETT
Civil Engineering
Public Works
Land Planning
Landscape Architecture
Land Surveying
Project Management
WASHINGTON

SUN COMMUNITIES INC

47° NORTH

CONCEPTUAL GRADING PLAN

CITY OF CLE ELUM

JOB NO.	2050-001-018
DWG. NAME	EN-19
DESIGNED BY:	LGB
DRAWN BY:	JJH
CHECKED BY:	
DATE:	03/30/2020

FIG 1-1

1 OF 2 SHEETS

File: \\Esm8\emp\LSM--JOBS\2050\001\018\exhibits\EN-19.dwg
Plotted: 3/30/2020 9:35 AM
Plotted By: Jeff Hinds

H-02

File: \\Esm8\engr\ESM-JOBS\2050\001\018\exhibits\EN-19.dwg
Plotted: 3/30/2020 9:56 AM Plotted By: Jeff Hiva



FOR CONTINUATION SEE SHEET 1 OF 2

SCALE: 1" = 200'
CONTOUR INTERVAL = 2'
200 100 0 200 400

47° N
RV RESORT & RESIDENCES

SUN COMMUNITIES INC

47° NORTH

CONCEPTUAL GRADING PLAN

CITY OF CLE ELUM WASHINGTON

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Civil Engineering Public Works | Land Surveying Project Management | Land Planning Landscape Architecture

REVISIONS
NO. DESCRIPTION/DATE BY

JOB NO. 2050-001-018
DWG. NAME EN-19
DESIGNED BY: GJB
DRAWN BY: JAH
CHECKED BY:
DATE: 03/30/2020

FIG 1-1
2 OF 2 SHEETS

This section updates the stormwater analysis for the property under the proposed SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment and SEIS Alternative 5. The stormwater analysis is compared to FEIS Alternative 5 as related to current code compliance, including the following items:

- Hydrology, including hydrologic model of existing and developed conditions. Developed conditions include development methodology for flow control, water quality, and conveyance.
- Water quality analysis of adjacent water bodies.

The current stormwater design standards for the property, including hydrologic modeling, are outlined in the 2019 Washington State Department of Ecology (Ecology) Stormwater Management Manual for Eastern Washington (SMMEW). The following current stormwater codes were also used for additional guidelines:

- 2019 Ecology Stormwater Management Manual for Wester Washington (SMMWW) – used for reference since it describes some stormwater concepts in more detail than the SMMEW.
- 2016 King County Surface Water Design Manual (KCSWDM) – used for reference as related to master drainage plans.
- 2019 Washington State Department of Transportation (WSDOT) Highway Runoff Manual (HRM) meets the level of stormwater management established in the SMMEW and has additional best management practices (BMPs).

2.1 Hydrology

2.1.1 Hydrologic Model

Following is an update to the stormwater hydrologic modeling completed for the 2002 EIS SETR:

- Evaluation of the original hydrologic modeling to verify it complies with current code requirements.
- Estimate of hydrologic impacts of the proposed SEIS Alternative 6 and SEIS Alternative 5 as compared to FEIS Alternative 5 and recommendations for associated mitigation.

2.1.2 Hydrologic Model Comparison

The hydrologic simulation model originally used for the 2002 EIS SETR is the same model used by the neighboring Suncadia project. The model is the Hydrologic Simulation Program - Fortran (HSPF) Release 11, (United States Environmental Protection Agency, 1996). The model continuously simulates the rainfall-runoff response of a watershed by simulating the physical process response to changing climatic conditions. HSPF is a standard hydrologic computational tool.

In past documentation, Ecology noted that HSPF is relatively complex to use and is best suited for basin plans and master drainage plans. Ecology requires the use of a continuous simulation model for basin plans. Due to the large size of the MountainStar watershed (19.5. square miles) and environmental review considerations, the HSPF model was selected for that project.

The 2019 SMMEW identifies HSPF as one of the best rainfall-runoff modeling approaches for Eastern Washington, but it does not go into further detail as to its benefits. Therefore, the 2016 KCSWDM was used as an additional guideline as relevant to HSPF and master drainage plans to confirm its applicability. The 2016 KCSWDM states *"HSPF is also an approved model but is more complex than other approved models and is typically used for basin planning and master drainage plan analyses."*

Therefore, the original hydrologic modeling continues to meet current code requirements and can be used for estimating hydrologic impacts of the proposed SEIS Alternative 6 and SEIS Alternative 5 development as compared to FEIS Alternative 5.

2.1.3 HSPF to MSRTS

Input to the model includes land segment information such as soil parameters, elevation and vegetation parameters, as well as several continuous climatological time series for the time period being simulated. The climatological parameters required by HSPF for runoff and snow simulation are:

- Precipitation
- Evaporation
- Air temperature
- Dewpoint temperature
- Solar radiation
- Wind movement

Runoff is modeled as the combined effect of surface flow, shallow subsurface flow (interflow) and groundwater flow response to climatological conditions. The distribution of flow between runoff mechanisms is determined by land segment characteristics such as soil moisture content, infiltration rate, and interception storage. The model generates flow from pervious and impervious land segments, and routes it through the drainage network. The drainage network can include pipes, streams, vaults, detention ponds, lakes and wetlands.

Snow accumulation and melt are simulated based on energy balance equations. Snowpack conditions, including ice content, density, albedo (reflectivity of the snow) and temperature, change over time according to climate conditions. Snowmelt water is added to precipitation inputs to the land segment and is routed through the land segment runoff mechanisms before entering the drainage network.

Northwest Hydraulics Incorporated, with the permission of King County, took the output from the HSPF model and used it to modify the King County Runoff Time Series (KCRTS) program. This new modified KCRTS program became the Mountain Star Runoff Time Series (MSRTS) that is used for the hydrology calculations for the Suncadia Master Planned Resort and the Bullfrog UGA that is now the proposed 47° North development. To most accurately model the pre and post developed conditions, all areas entered into MSRTS are classified in the gradual slope categories.

2.2 Existing Conditions

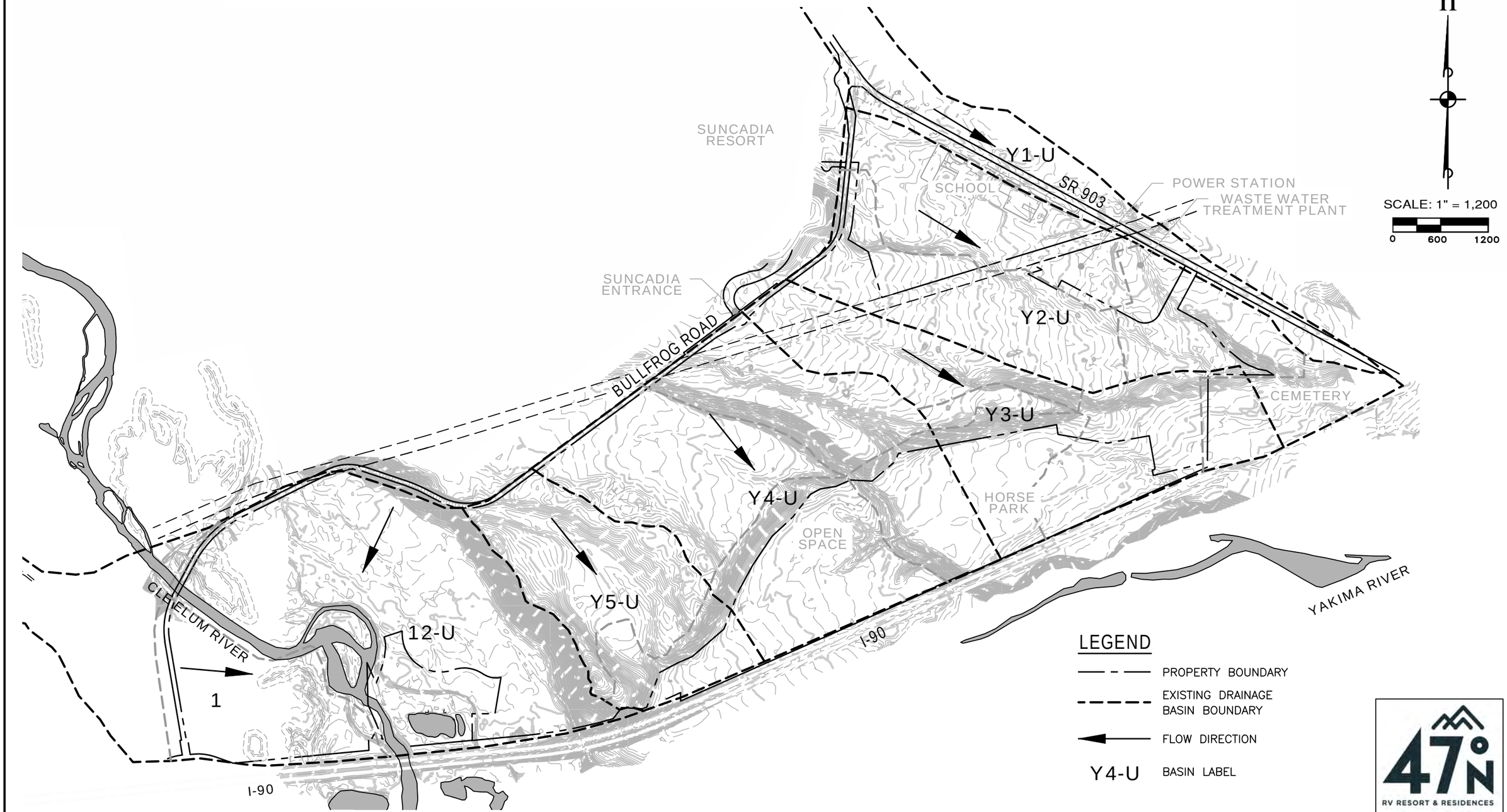
The existing conditions hydrologic model was developed as part of the 2002 EIS SETR, with basins and sub-basins, according to soil type, vegetative cover, and average slope conditions for FEIS Alternative 2, because it represented the highest impact alternative.

As described in Section 1 – Site Information, the SEIS Alternative 6 cleared, graded, and impervious areas are significantly less than FEIS Alternative 5, and SEIS Alternative 5 which are also less than FEIS Alternative 2. Therefore, the existing conditions hydrologic model of the 2002 EIS SETR is not required to be updated.

The existing condition basin information has been updated as relevant to the proposed 47° North development under SEIS Alternative 6 and SEIS Alternative 5. The soil type has been evaluated in more detail by Associated Earth Sciences, Inc. (AESI). The vegetative cover has been updated by Raedeke Associates, Inc.

The topographic aerial information and associated average slope conditions have remained generally the same to date, therefore the existing conditions model basin boundaries remain the same and are shown in **Figure 2-1**.

Alternative 6 and 47° North Master Plan



Source: ESM Consulting Engineers, 2020.

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H-02

Figure 2-1
Existing Subbasins

2.2.1 Soil Type

CDM (formerly AGI Technologies) originally characterized soil types on the property that have been analyzed in more detail by AESI for the 47° North development. **Table 2-1** summarizes the soil types present in each of the subbasins. The soil types for the property watershed are shown in **Figure 2-2.**

Table 2-1: Existing Subbasin Soil Types[a]

Subbasin	Basin Area (acres)	Alpine Till (Acres)	Outwash (Acres)	Dirty Glacial Outwash (acres)	Alluvium (acres)
Basin 1-1U	71	-	-	-	71
Basin 1-2U	-	-	-	-	-
Basin 12-U	225	13	163	-	49
Basin Y1-U	4	-	4	-	-
Basin Y2-U1	80	-	80	-	-
Basin Y2-U2	46	-	46	-	-
Basin Y2-U3	-	-	-	-	-
Basin Y2-U4	8	-	8	-	-
Basin Y3-U1	60	-	60	-	-
Basin Y3-U2	12	-	12	-	-
Basin Y3-U3	10	-	10	-	-
Basin Y3-U4	32	-	32	-	-
Basin Y3-U5	2	-	2	-	-
Basin Y4-U1	97	24	73	-	-
Basin Y4-U2	16	6	10	-	-
Basin Y4-U3	70	-	70	-	-
Basin Y4-U4	5	-	5	-	-
Basin Y5-U1	91	49	1	41	-
Basin Y5-U2	21	12	1	8	-
Total	**850**	**104**	**577**	**49**	**120**

[a] Includes only the portions of basins within 47° North development and commercial development.

2.2.2 Cover

Vegetative cover information has been field verified and analyzed by Raedeke Associates, Inc. into two general cover classes for the hydrologic model: forested for the majority of the site and grass with shrubs for the areas under the powerlines. The vegetative cover types for the property watershed are shown in **Figure 2-3.**

2.2.3 Slope

The existing ground topographic survey data has remained the same since the original 2002 EIS SETR was completed. In addition to the slope analysis performed originally, ESM has

performed an additional slope delineation, identifying 15 percent slope areas, 25 to 71 percent steep slope areas and the associated setback for clearing and grading. The slope limits were identified in the areas where the ground surface has a vertical relief of 10 feet or more at 25 percent. The results of the slope category delineation for the project watershed are shown in **Figure 2-4.**

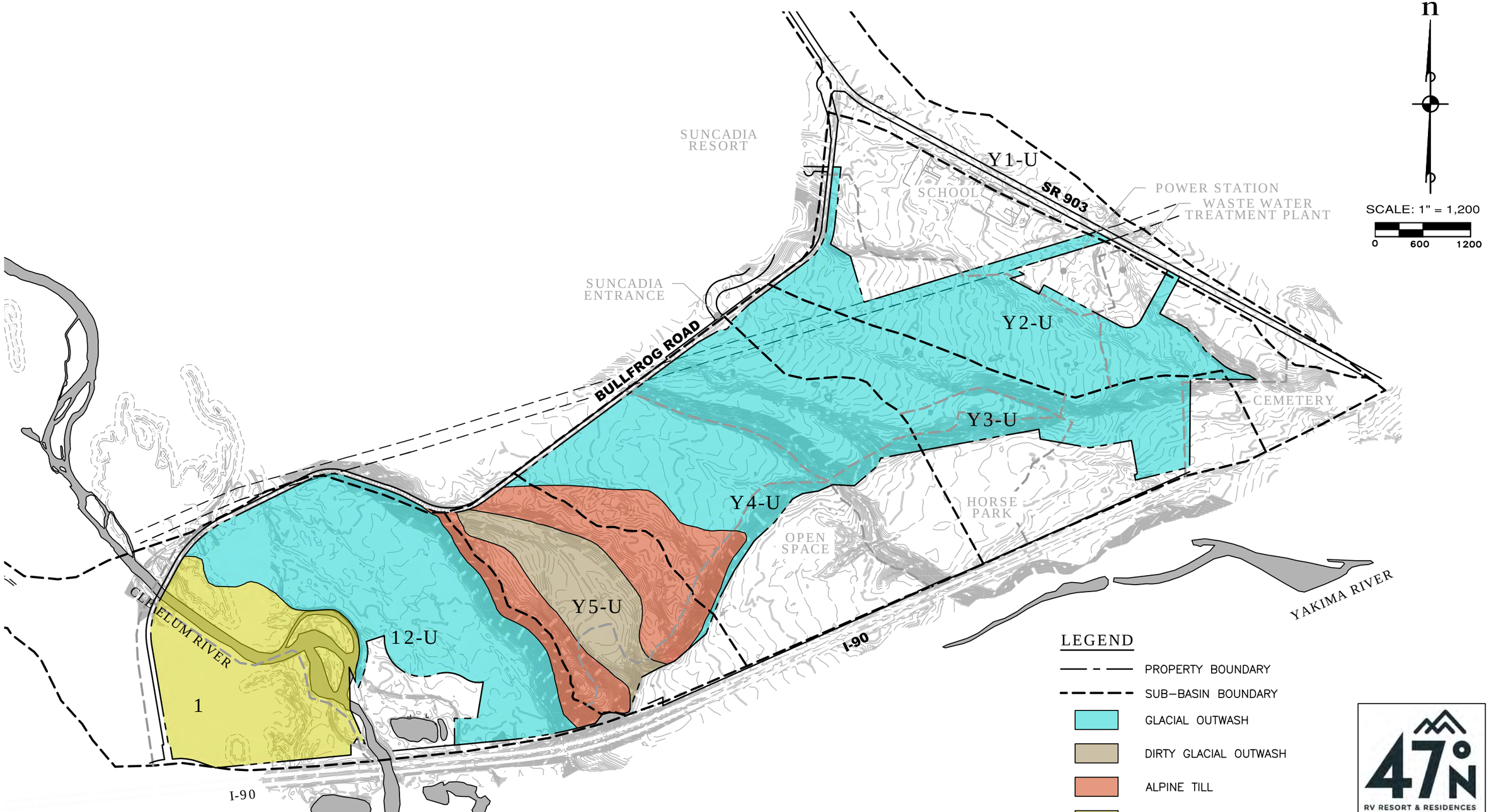
A summary of the existing conditions land use for the site is contained in **Table 2-2.**

Table 2-2: Pre-Developed Condition Subbasin Land-Use/Land Cover[a]

Subbasin	Basin Area (acres)	Forested Area (acres)	Grass/Shrubs (acres)	Impervious Roads (acres)	Impervious Other (acres)
Basin 1-1U	71	71	-	-	-
Basin 1-2U	-	-	-	-	-
Basin 12-U	225	225	-	-	-
Basin Y1-U	4	4	-	-	-
Basin Y2-U1	80	70	10	-	-
Basin Y2-U2	46	44	2	-	-
Basin Y2-U3	-	-	-	-	-
Basin Y2-U4	8	2	6	-	-
Basin Y3-U1	60	53	7	-	-
Basin Y3-U2	12	12	-	-	-
Basin Y3-U3	10	10	-	-	-
Basin Y3-U4	32	30	2	-	-
Basin Y3-U5	2	2	-	-	-
Basin Y4-U1	97	97	-	-	-
Basin Y4-U2	16	16	-	-	-
Basin Y4-U3	70	63	7	-	-
Basin Y4-U4	5	5	-	-	-
Basin Y5-U1	91	91	-	-	-
Basin Y5-U2	21	21	-	-	-
Total	**850**	**816**	**34**	**-**	**-**

[a] Includes only the portions of basins within 47° North development and commercial development.

Alternative 6 and 47° North Master Plan



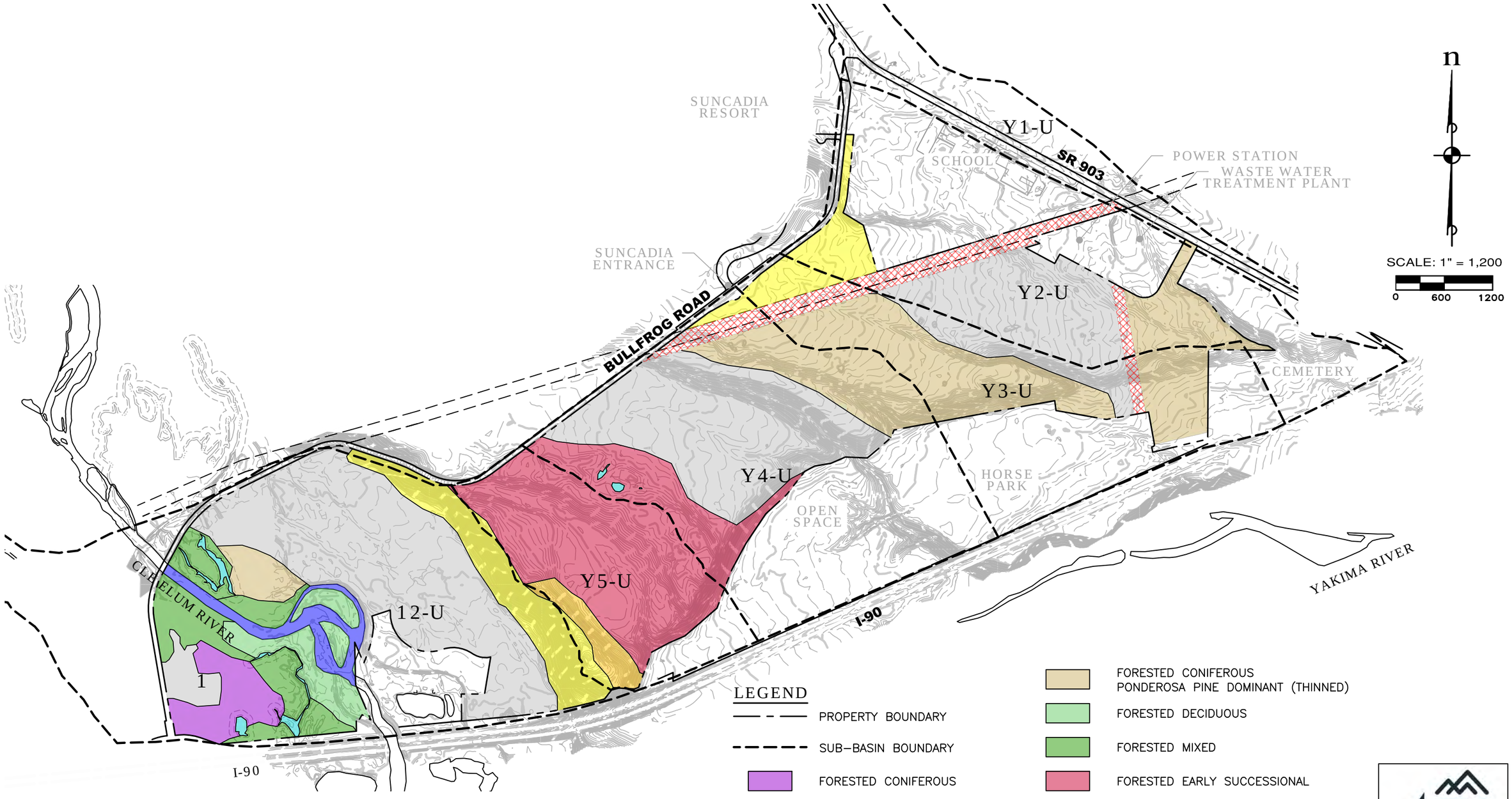
Source: Associated Earth Sciences Inc., 2020.

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Figure 2-2
Soil Types

Alternative 6 and 47° North Master Plan



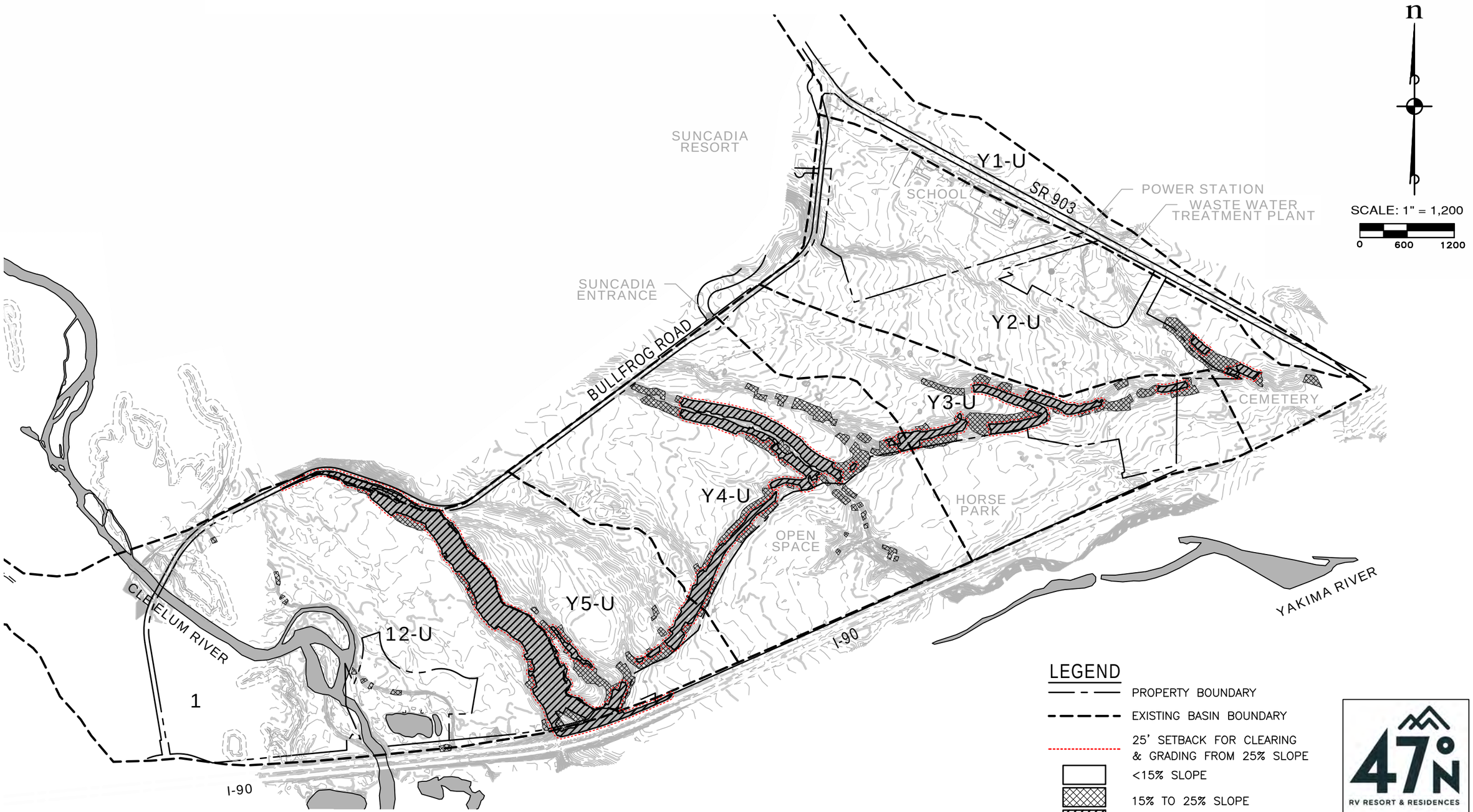
Source: Raedeke Associates Inc., 2020.

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Figure 2-3
Existing Vegetative Cover

Alternative 6 and 47° North Master Plan



Source: ESM Consulting Engineers, 2020.

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Figure 2-4
Slope Map

2.3 Developed Conditions

The developed condition drainage concept under SEIS Alternative 6 includes collection and conveyance facilities, water quality treatment facilities, infiltration basins, and detention basins.

Table 2-3 provides a summary of the developed land use/land cover.

Table 2-3: Developed Condition Subbasin Land-use/Land Cover, SEIS Alternative 6[a]

Subbasin	Basin Area (acres)	Undisturbed Area (acres)	Landscape Area (acres)	Impervious Road (acres)	Impervious Other (acres)
Basin 1-1U	71.0	71.0	-	-	-
Basin 1-2U	-	-	-	-	-
Basin 12-U	225.0	225.0	-	-	-
Basin Y1-U	4.0	-	0.7	-	3.3
Basin Y2-U1A	33.0	19.2	-	1.6	12.2
Basin Y2-U1B	13.0	-	6.4	1.4	5.2
Basin Y2-U1C	18.0	-	7.2	1.9	8.9
Basin Y2-U1D	20.0	0.9	9.8	2.2	7.1
Basin Y2-U2	49.0	2.7	15.9	5.7	24.7
Basin Y2-U3	-	-	-	-	-
Basin Y2-U4	6.0	6.0	-	-	-
Basin Y3-U1A	33.0	8.6	8.8	2.1	13.5
Basin Y3-U1B	16.0	-	7.3	2.0	6.7
Basin Y3-U2	10.0	-	5.0	1.1	3.9
Basin Y3-U3	12.0	12.0	-	-	-
Basin Y3-U4	51.0	20.7	28.3	0.4	1.6
Basin Y3-U5	2.0	2.0	-	-	-
Basin Y4-U1A	42.0	5.6	20.9	6.8	8.7
Basin Y4-U1B	55.0	15.0	22.1	8.2	9.7
Basin Y4-U2	13.0	13.0	-	-	-
Basin Y4-U3	13.0	1.3	6.9	1.3	3.5
Basin Y4-U4	52.0	32.7	17.5	0.6	1.2
Basin Y5-U1	95.0	24.0	50.2	8.1	12.7
Basin Y5-U2	17.0	17.0	-	-	-
Total	**850.0**	**476.7**	**207.0**	**43.4**	**122.9**

[a] Includes only the portions of basins within 47° North development and commercial development.

For comparison, impervious and landscaped areas for SEIS Alternative 6, FEIS Alternative 5, and SEIS Alternative 5 are summarized in Table 2-4.

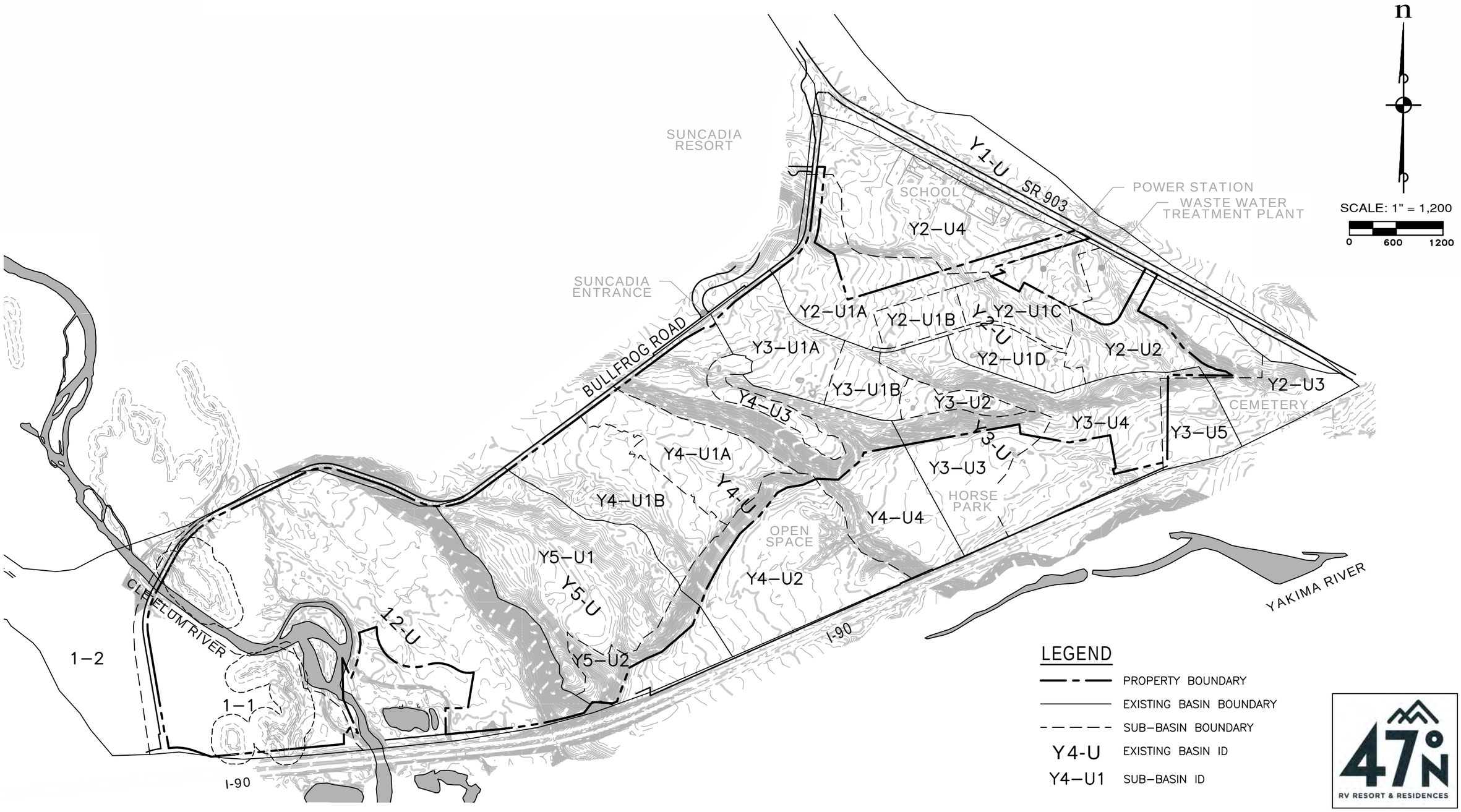
Table 2-4: Impervious and Landscape Area Summaries[a]

Surface Type, Acres	Project Alternative			
	SEIS Alternative 6		FEIS & SEIS Alternative 5[b]	
	Impervious Area	Landscape Area	Impervious Area	Landscape Area
Residential	71	72	104	57
Residential Amenity Center	5	1	0	0
Adventure Center	5	1	0	0
Roads	8	2	61	61
Public Facilities	0	0	4	19
Community Recreation Ctr.	0	0	6	4
School Expansion	0	0	8	9
Cemetery Expansion	0	0	1	7
Commercial Development	17	1	63	0
RV Park	57	88	0	0
RV Amenity Center	4	1	0	0
Total	**167**	**166**	**247**	**157**

[a]Note: Numbers may not sum to totals shown due to rounding.
[b]Excludes Reserve Area.

Developed conditions and developed condition basin boundaries are shown on **Figures 2-5** and **2-6.**

Alternative 6 and 47° North Master Plan



Source: ESM Consulting Engineers, 2020.

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Figure 2-5

Developed Condition Basin Boundaries

FOR CONTINUATION SEE SHEET 2 OF 2

BULLFROG ROAD

SECONDARY ENTRY

ADVENTURE CENTER

MUNICIPAL RECREATION CENTER SITE

D

MANUFACTURED HOUSING

MANUFACTURED HOUSING

MANUFACTURED HOUSING

MANUFACTURED HOUSING

AMENITY CENTER

Y3-U

CLE ELUM – ROSLYN SCHOOL DISTRICT 404

EXISTING HIGH SCHOOL

EXISTING ELEMENTARY AND MIDDLE SCHOOL

IRRIGATION PUMP STATION

COMMUNICATIONS

POWER STATION

Y2-U

MULTI-FAMILY

B

MANUFACTURED HOUSING

CITY OF CLE ELUM WATER TREATMENT PLANT

PRIMARY ENTRY

WASHINGTON STATE HORSE PARK

EX BASIN BOUNDARY (TYP)

A

MANAGEMENT ZONE BOUNDARY (TYP)

SR-903

MANUFACTURED HOUSING

BUSINESS PARK

MANAGEMENT ZONE BOUNDARY (TYP)

25' SETBACK FOR CLEARING AND GRADING FROM 25% SLOPE (TYP)

CEMETERY EXPANSION

EXISTING CEMETERY

INTERSTATE 90

YAKIMA RIVER

LEGEND

- PROJECT BOUNDARY
- GRAVITY SEWER
- EX GRAVITY SEWER
- PROPOSED WATER MAIN
- EX WATER TRANSMISSION LINE
- FIRE HYDRANT
- PRV STATION
- BOOSTER PUMP
- BPA TOWER
- PSE POLE
- A — MANAGEMENT ZONE LABEL
- Y2-U — EX BASIN LABEL
- MANAGEMENT ZONE BOUNDARY
- DEV. MAJOR DRAINAGE BASIN BOUNDARY
- DEV. MINOR DRAINAGE BASIN BOUNDARY
- WATER QUALITY TREATMENT
- INFILTRATION TRENCH OR INFILTRATION POINT DRAIN
- PROPOSED STORM DRAIN PIPE
- PROPOSED STORM DRAINAGE SWALE
- EX STORM DRAIN
- 25' SETBACK FOR CLEARING AND GRADING FROM 25% SLOPE
- WATER QUALITY
- INFILTRATION/DETENTION

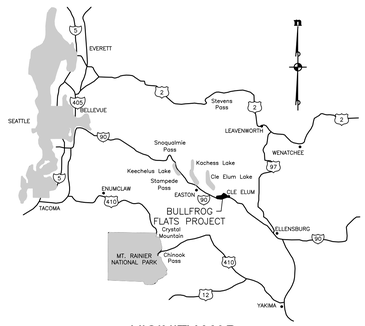
POND SPECIFIER

- A — AMENITY
- D — DETENTION
- I — INFILTRATION
- IRR — IRRIGATION
- O — OVERFLOW ROUTE
- WQ — WATER QUALITY
- DISPERSION

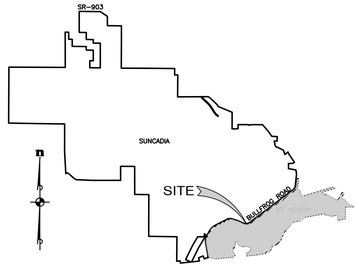
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KEY MAP
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47° N
RV RESORT & RESIDENCES

REVISIONS		
NO.	DESCRIPTION/DATE	BY

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(425) 337-3600
Land Planning
Landscape Architecture
Land Surveying
Project Management
Civil Engineering
Public Works

SUN COMMUNITIES INC

47° NORTH

COMCEPTUAL STORM DRAINAGE PLAN

CITY OF CLE ELUM WASHINGTON

JOB NO.	2050-001-018
DWG. NAME	EN-14
DESIGNED BY:	LGB
DRAWN BY:	JJH
CHECKED BY:	
DATE:	03/30/2020

FIG 2-6

1 OF 2 SHEETS

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H-02

LEGEND

- PROJECT BOUNDARY
- GRAVITY SEWER
- EX GRAVITY SEWER
- PROPOSED WATER MAIN
- EX WATER TRANSMISSION LINE
- FIRE HYDRANT
- PRV STATION
- BOOSTER PUMP
- BPA TOWER
- PSE POLE
- MANAGEMENT ZONE BOUNDARY
- DEV. MAJOR DRAINAGE BASIN BOUNDARY
- DEV. MINOR DRAINAGE BASIN BOUNDARY
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- PROPOSED STORM DRAIN PIPE
- PROPOSED STORM DRAINAGE SWALE
- EX STORM DRAIN
- 25' SETBACK FOR CLEARING AND GRADING FROM 25% SLOPE
- WATER QUALITY
- INFILTRATION/DETENTION
- A — MANAGEMENT ZONE LABEL
- Y2-U — EX BASIN LABEL

POND SPECIFIER

- A — AMENITY
- D — DETENTION
- I — INFILTRATION
- IRR — IRRIGATION
- O — OVERFLOW ROUTE
- WQ — WATER QUALITY
- DISPERSION

SECONDARY ENTRY

PRIMARY ENTRY

BULLFROG ROAD

RV RESORT

RV RESORT

AMENITY CENTER

MANUFACTURED HOUSING

Y5-U

Y4-U

25' SETBACK FOR CLEARING AND GRADING FROM 25% SLOPE (TYP)

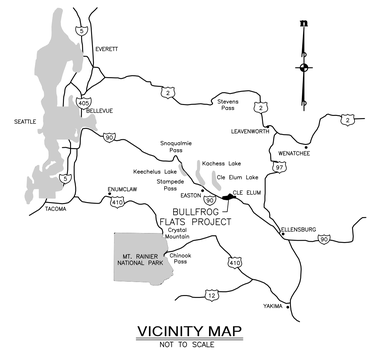
INTERSTATE 90

FOR CONTINUATION SEE SHEET 1 OF 2

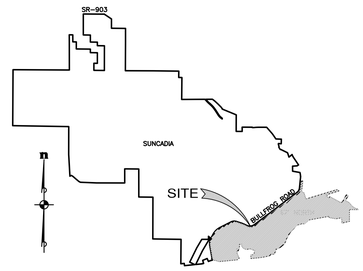
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CONTOUR INTERVAL = 2'



VICINITY MAP
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KEY MAP
NOT TO SCALE

47°N
RV RESORT & RESIDENCES

REVISIONS		
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SUN COMMUNITIES INC

47° NORTH

CONCEPTUAL STORM DRAINAGE PLAN

CITY OF CLE ELUM

WASHINGTON

JOB NO.	2050-001-018
DWG. NAME	EN-14
DESIGNED BY:	LGB
DRAWN BY:	JJH
CHECKED BY:	
DATE:	03/30/2020

FIG 2-6

2 OF 2 SHEETS

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H-02

2.4 Flow Control, Water Quality Treatment, and Conveyance Methodology

Under SEIS Alternative 6, stormwater runoff from the developed project areas impervious and landscaped surfaces will generally be collected in catch basins or roadside water quality swales and directed to water quality and infiltration or detention facilities (depending on existing soil features) via pipes or conveyance swales or dispersed, if feasible. Overflow routes will be provided for all proposed stormwater facilities.

2.4.1 Flow Control

The proposed flow control facilities will consist of either infiltration, detention, or sheet flow dispersion. Infiltration and detention facilities would be ponds or vaults, and the dispersion facilities would be trenches.

2.4.1.1 Infiltration Facilities

The majority of flow control facilities shown on **Figure 2-6** are infiltration ponds, as allowed by the existing outwash soils. These infiltration facilities were sized based on preliminary infiltration rates of 5 to 10 inches per hour recommended by AESI with a factor of safety of 20 percent. The infiltration facilities will infiltrate the 100-year storm event.

2.4.1.2 Detention Facilities

One proposed detention facility is located in the lower plateau of the RV park, because the existing soils in this area are alpine till. The proposed detention facility has been designed to detain the proposed developed flows and release pre-developed forested flows (50 percent of the 2-year storm event flow up to the 50-year storm event) to a dispersion trench that transforms the released flows to sheet flow dispersion at the natural discharge location.

2.4.1.3 Sheet Flow Dispersion

Sheet flow dispersion will also be used to for stormwater flow control, as may be applicable for single family and RV resort areas that abut open space and slope away from the developed areas in a native vegetated area with slopes less than 15 percent.

2.4.2 Water Quality Treatment

Water quality treatment will be provided for runoff from impervious road and parking surfaces. Treatment will be provided in one of several Ecology recommended treatment facility types. Water quality treatment options include wetponds, biofiltration swales, bio-infiltration and sheet flow dispersion. All water quality facilities are sized to treat the water quality storm. The water quality storm is that storm for which all storms equal or smaller in size account for 90 percent of the average annual runoff. Proposed water quality facilities are described in the following sections.

The 2002 UGA EIS divided the property into four water quality management zones named A, B, C, and D, as a result of underlying geology and the groundwater flow patterns. The developed

condition basin boundaries were established by an analysis of existing drainage basins, proposed roadway locations, and areas suitable for stormwater infiltration.

The water quality management zones and associated subbasins for the developed conditions are shown in **Figure 2-6**. The alluvial soils found adjacent to the Cle Elum River represent Management Zone C. The main central portion of the property is Management Zone D, which has areas of both till and outwash soils at the surface. Further east, under Management Zones A and B, the surface soils are similar to Zone D. However, Zones A and B are distinguished from D because the thick lacustrine aquitard is absent. Zone A is more proximate to the Yakima River and the associated Yakima Hatchery intake wells, which is why the two zones are separated.

Management Zone D runoff requires the basic level of treatment. This requirement can be satisfied by the use of a single facility such as a biofiltration swale or a water quality pond. Zone C does not have development proposed and thus has no direct influence on water quality. Zones A and B have less natural filtration afforded from the underlying sediments. Runoff from these zones requires enhanced treatment to further reduce dissolved metals and other contaminants prior to infiltration.

Management Zones A and B require the use of Ecology's enhanced treatment menu and Management Zone D will use the basic treatment menu. The water quality treatment best management practices most suited for the proposed 47° North development under SEIS Alternative 6 are described below.

2.4.2.1 Sheet Flow Dispersion

Sheet flow dispersion is an approved Ecology basic water quality and quantity control method for areas that preserve the existing forest duff, in a native vegetated area with slopes less than 15 percent.

2.4.2.2 Biofiltration Swales

Biofiltration swales are another approved Ecology basic water quality treatment facility which are sized to treat the water quality design storm. They may be used for enhanced treatment as part of a treatment train. Biofiltration uses vegetation in conjunction with slow and shallow-depth flow for runoff treatment. As runoff passes through the vegetation, pollutants are removed through the combined effects of sedimentation filtration, soil sorption, and plant uptake.

Biofiltration swales are not anticipated to be irrigated and therefore must be seeded with drought resistant vegetation suitable for the upper Kittitas County climate. The typical seed mixture that can be used for biofiltration swales is listed in **Table 2-5**.

Table 2-5: Typical Seed Mixture

Seed Mixture Type	Percentage
Sherman Big Blue Grass	10
Joseph Idaho Fescue	30
Sodar Streambank Bunch Grass	30
Secar Blue Bunch Wheat Grass	30

(Source: Wildland, Inc., Richland, WA, October 2000.)

This mixture may be changed based on recommendations from design professionals to accommodate site conditions.

2.4.2.3 Bioinfiltration Swales

Bioinfiltration swales, also known as grassed percolation areas, combine grasses (or other vegetation) and soils to remove stormwater pollutants by percolation into the ground. Their pollutant removal mechanisms include filtration, soil sorption, and uptake by vegetated root zones. Bioinfiltration swales may be used for basic or enhanced water quality treatment.

2.4.2.4 Bioretention Cells or Swales

Bio-retention cells or swales provide treatment by using a designed planting soil mix and a variety of plant material, including trees, shrubs, grasses, and/or other herbaceous plants. Bioretention cells or swales may be used for basic or enhanced water quality treatment.

2.4.2.5 Water Quality Ponds or Vaults

Water quality ponds or vaults provide basic runoff treatment by allowing the settling of particulates during quiescent conditions. Additionally, when a shallow marsh area is provided for a wet pond, basic runoff treatment is provided by biological uptake through plant growth and by vegetative filtration. Water quality ponds contain a permanent pool of water and a wet pool equal to the runoff volume of the water quality storm event. Water quality ponds or vaults are sized based upon the volume of the water quality storm and may be combined with a detention facility or be part of a treatment train for enhanced treatment.

2.4.2.6 Infiltration Ponds

Infiltration ponds may also be used for basic or enhanced water quality treatment where soils remove pollutants from stormwater using either suitable native soils or a treatment layer.

2.4.2.7 Sand Filters

Sand filters provide enhanced water quality treatment from filtration, which removes particulates and associated contaminants, and from adherence of contaminants within the filter.

2.4.2.8 Filter Strips

Filter strips provide biofiltration of runoff and basic or enhanced water quality treatment. They may be used in a treatment train for enhanced water quality or stand-alone, with compost-amended vegetation. Filter strips are typically installed adjacent to paved areas (road, parking, drives), receive runoff directly from those areas, and discharge to a collection system.

2.4.3 Conveyance

Collection and conveyance of stormwater will be by conventional methods of curbs and gutters, catchbasins, and buried storm drainpipes, depending on the development area. Where appropriate to specific site design, conveyance by grass-lined ditches and swales may be considered.

Culvert crossings will be designed for the locations where proposed roadways or utility infrastructure cross draws or ravines. These culverts will be sized to convey the upstream runoff, following Ecology requirements.

2.4.4 Overflow Routes

Each detention or infiltration stormwater facility is anticipated to have an overflow route that discharges to an overflow drainage swale or enclosed pipe where it is conveyed to a downstream facility or controlled dispersion area. In the case of infiltration ponds, overflow routes are provided to the next downstream infiltration facility where feasible. This provides for the infiltration of stormwater even if one facility is partially clogged or out of operation.

2.5 Developed Condition Summary

Based on the 2002 EIS SETR, 7.40 acre-feet of average runoff was established per acre of equivalent impervious area. The total impervious area and estimated runoff comparing SEIS Alternative 6 with FEIS Alternative 5 and SEIS Alternative 5 is shown in **Table 2-6.**

Table 2-6: Estimated Annual Runoff

Alternative	Equivalent Impervious Area, Acres	Estimated Average Runoff (Surface and Interflow), Ac-Ft
SEIS Alt. 6	166	1,236
FEIS & SEIS Alt. 5	247	1,828

2.6 Water Quality Analysis

A Water Quality Technical Report was originally completed as part of the 2002 UGA EIS as it relates to water quality elements of the Yakima and Cle Elum Rivers and groundwater.

The proposed 47° North development under SEIS Alternative 6 will infiltrate or disperse all stormwater runoff and no direct discharge of stormwater is proposed to the Yakima river. The proposed infiltration and dispersion facilities are at a distance of approximately 3,000 feet from the Yakima river.

No development is proposed in the Cle Elum river drainage basin.

The purpose of this water quality analysis is to update the 2002 UGA EIS water quality information for current conditions and codes currently in effect.

2.6.1 Hydrologic Setting

The hydrologic setting of the property was previously described in the 2002 UGA EIS and has not changed in 2020. The proposed 47° North development lies within the upper Yakima River drainage basin, which is designated as Water Resource Inventory Area (WRIA) 39 (Washington State Department of Fisheries [WDF] 1975). The property is adjacent to the lower portion of the Cle Elum River between Bullfrog Road and Interstate 90. The Cle Elum River runs along the western boundary of the site and joins the Yakima River at River Mile (RM) 185.6. The Yakima River and Interstate 90 run along the southern boundary of the site.

528 acres of the property is topographically located within the Yakima River basin, and 296 acres is topographically within the Cle Elum River basin. Due to the nature of surface soils on the site, natural drainage from the site occurs through infiltration and subsurface groundwater flow. The Cle Elum River flows are controlled at the Cle Elum Dam operated by the United States Bureau of Reclamation (USBR). The dam is upstream of the project at RM 8.2. Water impounded by the dam forms Cle Elum Lake, which the USBR uses primarily for storing fall, winter and spring flows to supply late-spring through early fall irrigation demands in the Yakima Valley. A secondary function of the dam is flood control.

2.6.2 Surface Water Quality

Use designations for fresh waters by water resource inventory area (WRIA) are described in WAC 173-201A-602.

The Yakima River, for the reach from the Cle Elum River confluence (RM 185.6) up to its headwaters, has the following uses:

Aquatic Life Use:	Core summer salmonid habitat
Recreation Use:	Primary contact recreation
Other Uses:	Water Supply Uses (Domestic, Industrial, Agricultural, Stock) and Miscellaneous Uses (Wildlife Habitat, Harvesting, Commerce/Navigation, Boating, Aesthetics).

The Yakima River, from its mouth to the confluence with the Cle Elum River has the following uses:

Aquatic Life Use:	Salmonid spawning, rearing, and migration
Recreation Use:	Primary contact recreation
Other Uses:	Water Supply Uses (Domestic, Industrial, Agricultural, Stock) and Miscellaneous Uses (Wildlife Habitat, Harvesting, Commerce/Navigation, Boating, Aesthetics).

The Cle Elum River from the mouth to Cle Elum Dam (RM 8.2) is identified as water body segment WA-39-1050 and has the following uses:

Aquatic Life Use:	Core summer salmonid habitat
Recreation Use:	Primary contact recreation
Other Uses:	Water Supply Uses (Domestic, Industrial, Agricultural, Stock) and Miscellaneous Uses (Wildlife Habitat, Harvesting, Commerce/Navigation, Boating, Aesthetics).

The Yakima River, from its mouth to the confluence with the Cle Elum River has the following water quality criterion:

Temperature:	17.5°C (63.5°F)
Supplemental spawning:	None
Dissolved Oxygen (DO):	8.0 mg/L
pH:	pH shall be within the range of 6.5 to 8.5, with a human-caused variation within the above range of less than 0.5 units
Turbidity:	5 NTU over background when the background is 50 NTU or less; or a 10 percent increase in turbidity when the background turbidity is more than 50 NTU.
Bacteria:	E. coli and fecal coliform criteria are expressed as colony forming units (CFU) or most probable number (MPN). To protect recreational use: ➢ E.coli organism levels must not exceed a geometric mean value of 100 CFU or MPN per 100 mL, with not more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained for calculating the geometric mean value exceeding 320 CFU or MPN per 100 mL. ➢ Fecal coliform organism levels must not exceed a geometric mean value of 100 CFU or MPN per 100 mL, with not more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained for calculating the geometric mean value exceeding 200 CFU or MPN per 100 mL. (The use of

fecal coliform organism levels to determine compliance will expire December 31, 2020.)

Other requirements:

- A minimum of three samples is required to calculate a geometric mean for comparison to the geometric mean criteria. Sample collection dates shall be well distributed throughout the averaging period so as not to mask noncompliance periods.
- When averaging bacteria sample values for comparison to the geometric mean criteria, it is preferable to average by season. The averaging period of bacteria sample data shall be ninety days or less.

The Yakima River, for the reach from the Cle Elum River confluence up to its headwaters, and the Cle Elum River from the mouth to Cle Elum Dam have the following water quality criterion:

Temperature:	16°C (60.8°F)
Supplemental spawning:	Salmon and trout (13°c) from 9/15 to 6/15
Dissolved Oxygen (DO):	9.5 mg/L
pH:	pH shall be within the range of 6.5 to 8.5, with a human-caused variation within the above range of less than 0.2 units
Turbidity:	5 NTU over background when the background is 50 NTU or less; or a 10 percent increase in turbidity when the background turbidity is more than 50 NTU.
Bacteria:	E. coli and fecal coliform criteria are expressed as CFU or MPN.

To protect recreational use:

- E.coli organism levels must not exceed a geometric mean value of 100 CFU or MPN per 100 mL, with not more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained for calculating the geometric mean value exceeding 320 CFU or MPN per 100 mL.
- Fecal coliform organism levels must not exceed a geometric mean value of 100 CFU or MPN per 100 mL, with not more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained for calculating the geometric mean value exceeding 200 CFU or MPN per 100 mL. (The use of fecal coliform organism levels to determine compliance will expire December 31, 2020.)

Other requirements:

- A minimum of three samples is required to calculate a geometric mean for comparison to the geometric mean

criteria. Sample collection dates shall be well distributed throughout the averaging period so as not to mask noncompliance periods.

- When averaging bacteria sample values for comparison to the geometric mean criteria, it is preferable to average by season. The averaging period of bacteria sample data shall be ninety days or less.

For both the Yakima and Cle Elum Rivers, the water quality standards have generally remained the same since the 2002 UGA EIS and are listed below. The only notable update is that the Yakima River (from its mouth to the confluence with the Cle Elum River) has a reduced temperature requirement from 18°C (64.4°F) to 17.5°C (63.5°F). This temperature variation does not affect the proposed development because there is no direct discharge of stormwater proposed to the Yakima River.

2.6.3 The Water Quality Assessment and the 303(d) List

The Water Quality Assessment was completed by Ecology with water bodies divided into the following categories:

Category 1:	Meets standards for parameter(s) for which it has been tested.
Category 2:	Waters of concern.
Category 3:	Waters with no data or insufficient data available.
Category 4:	Polluted waters that do not require a TMDL because a) they have an approved TMDL being implemented, or b) they have a pollution control program in place that should solve the problem, or c) are impaired by a non-pollutant such as low water flow, dams, or culverts.
Category 5:	Polluted waters that require a TMDL – the 303(d) list.

Based on the Ecology website, the Yakima River is identified as Category 1 and the Cle Elum River is identified as Category 2, waters of concern with the specific concern of temperature. No development is proposed in the Cle Elum river drainage basin; therefore no mitigation is proposed.

2.6.4 Stormwater Runoff National Pollutant Discharge Elimination System (NPDES) Permit

Temporary stormwater management will be completed such as to prevent the transport of sediment from the project site to downstream water resources, following the best management practices and requirements of the Construction Stormwater Pollution Prevention Plan.

For all new construction activity exceeding 1 acre in size, a Notice of Intent (NOI) must be filed for a NPDES General Permit with Ecology, as associated with clearing, grading, and temporary erosion and sediment control. A Stormwater Pollution Prevention Plan (SWPPP) is also required for the project.

The property currently has an active NPDES Permit (No. WA0052361). This permit will be amended to include a transfer of coverage for new ownership. A SWPPP document was also prepared by W&H Pacific, Inc. in 2002. The SWPPP will be amended prior to the construction phase of the project as applicable to the proposed 47° North development and current Ecology requirements.

2.7 Stormwater Summary

The proposed SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment development cleared and impervious areas are significantly less than FEIS Alternative 5 in the 2002 EIS SETR and SEIS Alternative 5, and therefore will generate less impact to onsite stormwater as well as downstream to the Yakima River. No significant impacts are anticipated, and no additional mitigation is proposed other than what is already required by current codes.

Section 3 Preliminary Water Plans

Presented in this section is information on the preliminary water system concepts for SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment and a comparison to the FEIS Alternative 5 estimates as evaluated in the 2002 EIS SETR and SEIS Alternative 5.

3.1 System Capacity Requirements

The City of Cle Elum 2015 Water System Plan (WSP) was used as a guideline to determine requirements for the proposed 47° North development. This plan is in the process of being updated with completion anticipated in February 2022.

Two water systems are available for the 47° North development: a treated water system and an untreated water system.

The proposed 47° North development under SEIS Alternative 6 intends to use the treated water system as a standard potable water system providing water to all dwelling units and commercial uses in the area. The treated system would provide some minor irrigation for common areas as associated with entries, amenities, and public road right-of-way. The proposed project will include low-flow fixtures consistent with State building code requirements, limitations on landscaping, and other water-conservation measures as coordinated with the City of Cle Elum.

The untreated water system is available, if desired, for irrigation water to larger demand areas such as amenity and adventure centers, recreation areas and other open spaces.

3.2 Treated (Domestic) Water Requirements

Water demands for the development were based on Washington State Department of Health standard unit demands. Unit interior water demands for each unit type are described below.

3.2.1 Single Family and Multi-Family

Unit interior demands for single family residences and multi-family unit accommodations are summarized in **Tables 3-1** and **3-2,** respectively.

Table 3-1: SEIS Alternative 6 Single Family Residences

	Primary Residences
Party Size	2.34
Unit Demand (gpdpc)	100
Total Interior Unit Demand (gpd)	234
Average Annual Occupancy	90%

Table 3-2: SEIS Alternative 6 Multi-Family Units

	Primary Residences
Party Size	2.34
Unit Demand (gpdpc)	100
Total Interior Unit Demand (gpd)	234
Average Annual Occupancy	90%

Water use for both single and multi-family units was calculated using the Total Interior Unit Demand of 234 gpd x 707 units x 90 percent average annual occupancy resulting in 148,894 gpd.

3.2.2 Commercial Development

Potable water use for the business center was based on 0.085 gpd x 150,000 square-feet of office space resulting in 12,750 gpd.

3.2.3 RV Park Guests

Campsite water use was based on 627 units x 3 persons per unit x unit demand of 50 gpd per person per unit x average annual occupancy was assumed to be 50 percent resulting in 47,025 gpd.

3.2.4 Amenity and Adventure Center Guests

The amenity and adventure centers demand is estimated to be 12 gpd per person, matching the 2002 EIS SETR. A total maximum of 500 guests per day was assumed for both amenity centers and the adventure center resulting in 6,000 gpd.

3.2.5 Outside Water Demands

Outside water demands were calculated as a percentage of total landscaped area. The total proposed development landscaped area under SEIS Alternative 6 is approximately 200 acres, and 10 percent is estimated to be irrigated, for a total irrigated landscaped area of 20 acres. For the commercial area, the estimated irrigated landscaped area is 1 acre.

The irrigation demands calculated for the months of June to September using the same irrigation factors from the 2002 EIS SETR. The net unit area irrigation requirement for turf and the resulting applied irrigation rate at a 60 percent irrigation efficiency are given in **Table 3-3**. Maximum monthly irrigation allowances for each maximum irrigated area are presented in **Table 3-4**.

Table 3-3: Irrigation Requirements

Month	Net Irrigation Requirement, in [a]	Applied Irrigation Requirement, in [b]
May	0.0	0.0
June	3.3	5.5
July	6.5	10.8
August	4.8	8.0
September	3.5	5.8
October	0.0	0.0
Total	18.1	30.2

[a] Source: Washington State Irrigation Guide, turf/pasture requirements, Cle Elum.
[b] At 60 percent irrigation efficiency.

Table 3-4: Maximum Allowable Irrigation Flows, gpd

Month	Residential	Commercial
June	99,559	4,978
July	195,497	9,775
August	144,813	7,241
September	104,989	5,249

Monthly treated water demands at buildout, including irrigation demands, for SEIS Alternative 6, FEIS Alternative 5, and SEIS Alternative 5 are presented in **Tables 3-5** and **3-6**.

Table 3-5: Avg. Daily Treated Water Demands at Buildout, mgd

Alt. No.	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Avg.	Total (ac-ft)
SEIS 6	0.20	0.20	0.20	0.20	0.20	0.30	0.40	0.35	0.31	0.20	0.20	0.20	0.25	277
FEIS 5[a]	0.33	0.33	0.33	0.33	0.33	0.47	0.60	0.53	0.48	0.33	0.33	0.33	0.39	442
SEIS 5[a]	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

[a] Excludes Reserve Area.

Table 3-6: Avg. Daily Treated Water Demands at Buildout for Commercial Development Demands, mgd

Alt. No.	Jan.	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Avg.	Total (ac-ft)
SEIS 6	0.01	0.01	0.01	0.01	0.01	0.02	0.02	0.02	0.02	0.01	0.01	0.01	0.02	17
FEIS 5[a]	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	100
SEIS 5[a]	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	0.09	100

[a] Excludes Reserve Area.

Peaking factors used for the water system design are presented in **Table 3-7** and are applied to maximum month average daily demands. Equalizing storage will be provided to accommodate

hourly peak requirements. These peaking factors are applicable only to the treated water demands.

Table 3-7: Peaking Factors

Ratio	Peaking Factor
Maximum Daily to Average Daily (Maximum Month)	2.00
Maximum Daily to Average Daily for Commercial Development (Maximum Month)	3.33
Maximum Hourly to Average Daily (Maximum Month)	5.00

Using the above average daily water demands and peaking factors, the maximum month design demands (at buildout) are given in **Table 3-8.** The maximum month design demands (at buildout) for the commercial development demands are given in **Table 3-9.**

Table 3-8: Maximum Month Treated Water Demands

	Average Daily Demand (ADD)[a,b]	Maximum Day Demand (MDD)[a,c]	Peak Hour Demand (PHD)[a,d]
SEIS Alt. 6	0.27 mgd (189 gpm)	0.61 mgd (420 gpm)	1.21 mgd (840 gpm)
FEIS Alt. 5[e, f]	0.60 mgd (417 gpm)	0.88 mgd (611 gpm)	1.27 mgd (882 gpm)
SEIS Alt. 5[e]	0.38 mgd (265 gpm)	1.50 mgd (1,042 gpm)	3.00 mgd (2,085 gpm)

[a] For treated water the daily system loss is calculated as total annual demand x 10% / 365 = 24,730 gpd (SEIS Alt. 6), 35,800 gpd (FEIS Alt. 5), and 34,690 gpd (SEIS Alt. 5).
[b] ADD is calculated as average month estimated demand + system loss.
[c] MDD was obtained from Tables 3 and 4 of the HLA memorandum dated April 5, 2021.
[d] PHD was obtained from Tables 3 and 4 of the HLA memorandum dated April 5, 2021.
[e] Excludes Reserve Area.
[f] Uses original 2002 EIS SETR calculations and 1.5 MDD and 2.2 PHD peaking factors.

Table 3-9: Maximum Month Treated Water Demands, Commercial Development Demands

	Average Daily Demand (ADD)[a,b]	Maximum Day Demand (MDD }[a,c]	Peak Hour Demand (PHD)[a,d]
SEIS Alt. 6	0.02 mgd (11 gpm)	0.09 mgd (60 gpm)	0.08 mgd (52 gpm)
FEIS Alt. 5[e, f]	0.09 mgd (60 gpm)	0.13 mgd (90 gpm)	0.19 mgd (130 gpm)
SEIS Alt. 5[e]	0.10 mgd (69 gpm)	0.32 mgd (221 gpm)	0.46 mgd (326 gpm)

[a] For treated water the daily system loss is calculated as total annual demand x 10% / 365 = 1,500 gpd (SEIS Alt. 6), 8,100 gpd (FEIS Alt. 5), and 9,000 gpd (SEIS Alt. 5).
[b] ADD is calculated as average month estimated demand + system loss.
[c] MDD is calculated as maximum month estimated demand x 3.33 + irrigation + system loss.
[d] PHD is calculated as maximum month estimated demand x 5.00 + irrigation + system loss.
[e] Excludes Reserve Area.
[f] Uses original 2002 EIS SETR calculations and 1.5 MDD and 2.2 PHD peaking factors.

3.2.6 Equivalent Residential Unit (ERU) Demands

The ERU values were evaluated as part of the original 2002 EIS SETR and estimated at 302 gpd/ERU ADD and 750 gpd/ERU MDD. An analysis of ERU values will be completed to confirm demand.

In accordance with the City of Cle Elum's adopted water policy for the urban growth area, the City will initially issue certificates of water availability for the project based on the water use rate set forth in the City's 2015 Comprehensive Water Plan. The Washington State DOH design criteria requires a minimum of three years of historical consumption data be used in establishing ERU average demand.

3.2.7 Fire Flows

Fire flow and domestic water demand requirements will account for all buildings other than residential to be sprinkled.

Chapter 248-293-640 Washington Administrative Code (WAC), specifies minimum fire flow demands of 500 gpm for 30 minutes for residential areas, and 750 gpm for 60 minutes for commercial and multi-family areas. The City of Cle Elum supersedes this requirement in the WSP where fire suppression storage equals 480,000 gallons (4,000 gpm for 2 hr duration). The minimum fire flow at locations not otherwise identified in the WSP is 1,000 gpm.

All proposed construction will be evaluated in accordance to the City of Cle Elum, the 2015 International Fire Code, and the City of Cle Elum Fire Chief for compliance with applicable fire protection safety standards.

3.3 Untreated Water Requirements

Untreated water may be used in the future for recreational irrigation and public landscape irrigation. Untreated water is not proposed to be used at this time.

3.4 Water Use Standards

Draft Water Use Standards will be updated as part of the Development Standards for the 47° North development. The Standards would be required under the project CC&R's. The Draft Water Use Standards are provided at the end of this section. The conditions of approval as well as the CC&Rs will require that these water use standards in the UGA be met.

3.5 Source of Water Supply

Based on the 2015 Water System Plan, the domestic water system in Cle Elum consists of a municipal water supply system on three distribution pressure zones. Four sources supply water to the system. Two major water supply sources owned by the City of Cle Elum are surface water

sources on the Yakima and Cle Elum Rivers. These two river sources pump water to the Cle Elum water treatment plant for filtration and chlorination before entering the distribution system. The Town of South Cle Elum also owns two ground water sources (Well No. 1, and Well No. 7) that are included in the regional water system and have have a combined pumping capacity of 300 gpm.

There is an existing water treatment plant, located at the northeast corner of the property, just west of SR 903 and south of the Puget Sound Energy Substation as shown in **Figure 3-1**.

The existing water treatment plant has been active since 2004. Its purpose is to generate potable water by filtering and processing raw Yakima River and Cle Elum River water. The current treatment capacity of this plant currently is 6 million gallons per day with room for expansion to 8 million gallons per day. This water plant serves the City of Cle Elum, the Town of South Cle Elum, and Suncadia.

FEIS Alternative 5 of the 2002 EIS SETR was included as a community planned to be serviced by this water treatment plant.

3.6 Preliminary Water Distribution System Plan

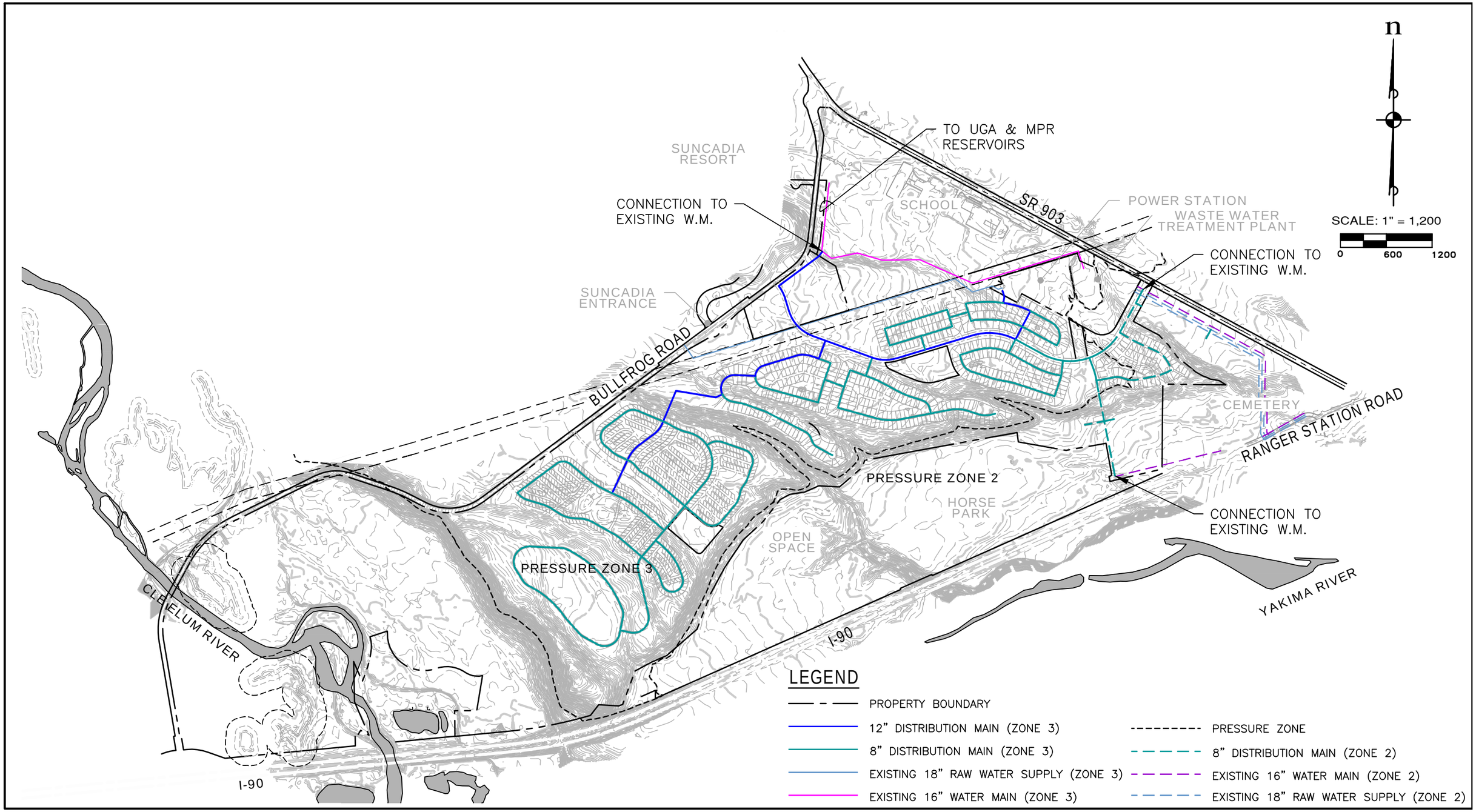
The preliminary water distribution system for domestic supply for the 47° North development under SEIS Alternative 6 is shown on **Figure 3-1**. Also shown on **Figure 3-1** are the existing water utilities, including the treated domestic water transmission main and the untreated raw water irrigation transmission main.

The preliminary water distribution system has four points of connections proposed in order to avoid dead-end conditions that can hinder fire flow demand and add flexibility for maintenance and operation of the network system. The available points of connection for the site's fire and treated domestic water supply are as follows:

- To an existing 16-inch diameter treated water line that supplies the reservoir tank, at a point north of the BPA easement and west of the existing high school site (Pressure Zone 3).
- To an existing 16-inch diameter treated water line that supplies the reservoir tank, at a point south of the BPA easement and south of the existing high school site (Pressure Zone 3).
- To an existing 16-inch diameter City supply line that flows from the Water Treatment Plant towards Cle Elum, on the east side of the project site, along SR 903 (Pressure Zone 2).
- To an existing 16-inch diameter City treated water main stub-out on Douglas Munro Boulevard, near the southwest corner of the existing cemetery (Pressure Zone 2).

The proposed single- and multi-family development as well as the RV resort will be part of a private Group A water system that will be permitted thru the Department of Health and owned, operated, and maintained privately. One water meter is anticipated to serve the single- and multi-family portion of the developed site and a second water meter will serve the RV resort site. The water mains will connect to the nearest available points of connection as listed above.

The commercial development will be served by the existing 8-inch diameter treated City supply line in an estimated looped system and metered thru the City of Cle Elum.



Source: ESM Consulting Engineers, 2020.

EA Engineering, Science, and Technology, Inc., PBC

H-02

Figure 3-1

Preliminary Water Plan - SEIS Alternative 6

3.6.1 Pressure Zones

The study area for FEIS Alternative 5, SEIS Alternative 5, and SEIS Alternative 6 is split into two pressure zones at an elevation of approximately 2,080 feet. Zone 3 (upper elevation pressure zone) encompass the elevations between 2,154 and 2,080. Zone 2 (lower elevation pressure zone) encompasses the elevations between 2,080 and 2,000. Pressure reducing stations would be installed at most of the distribution lines crossing the boundary between Zones 3 and 2.

3.6.2 Treated Water Storage

Treated Water Storage was evaluated by the City Engineer, HLA Engineering and Land Surveying, Inc., as part of an updated water system analysis that preliminarily evaluates storage and pumping. Based on this preliminary evaluation, the existing water system is not sufficient to meet projected water storage requirements. The proposed treated water storage mitigation consists of a new reservoir in Zone 3.

3.6.3 Distribution Mains

The distribution systems for the 47° North development under SEIS Alternative 5 is comprised of looping water distribution pipe networks of 8- to 12-inch diameter waterlines. The distribution system for each alternative will provide water at pressures between 31 and 72 psi to all services during maximum day demand.

The untreated irrigation demands, if needed, would be served from the transmission mains shown in **Figure 3-1.**

3.7 Water Use Standards

The Water Use Standards were established as part of the original 2002 EIS SETR to minimize indoor and outdoor water use. The indoor water use standards required water conservation fixtures and encouraged water conservation appliances and the outdoor water use standards limits irrigated areas. These standards are not anticipated to require revisions. Water use and conservation policies will be contained in the CC&R's for the 47° North development, including low-flow fixtures, limitations on landscaping, and other water-conservation measures as coordinated with the City of Cle Elum.

3.8 Preliminary Water Plans Summary

The proposed SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment development water demand is significantly less than FEIS Alternative 5 and SEIS Alternative 5 because the proposed RV use and commercial development footprint generate less demand than the uses previously contemplated.

In addition to water storage, the HLA updated water system analysis also evaluated preliminarily pumping. Based on this preliminary evaluation, the existing water system is not sufficient to meet both projected water demand and storage requirements.

The total proposed mitigation consists of three new elements: a filter train, a finished water pump, and a Zone 3 reservoir. SEIS Alternative 5 would be responsible for 72% of these improvements while the proposed 47° North development is responsible for only 59% of these improvements. For more information see the HLA memorandum dated April 5, 2021 in the appendix.

In summary, the proposed development triggers additional mitigation for water storage and pumping and will be responsible for 59% of this mitigation.

Section 4 Preliminary Sewer Plans

Presented in this section is information on the preliminary sewer system concepts for SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment and a comparison to the FEIS Alternative 5 estimates as evaluated in the 2002 EIS SETR and SEIS Alternative 5.

4.1 Wastewater Flow Projections

Wastewater flow projections were generally estimated the same way as in the 2002 EIS SETR, with updated uses for SEIS Alternative 6. The wastewater production is calculated as a percentage of inside water demand, as shown in **Table 4-1**. The percent return values were developed considering Ecology's standard flow rate for new systems (including normal infiltration), side sewer length considerations relative to the type of unit appropriate adjustments infiltration, and typical wastewater flow data presented in the literature (i.e., Metcalf & Eddy, *Wastewater Engineering - Treatment, Disposal, Reuse*, 3rd edition). For purposes of system pipe sizing and design, seasonally varying infiltration and inflow percentages, shown in **Table 4-2**, were applied to the wastewater generation estimates.

Table 4-1: Wastewater Generation/Return Flow as a Fraction of Inside Water Demand – SEIS Alternative 6

Unit Type	Percentage of Water Demand
Multi-Family	90
Single Family	80
Daytime Visitors/Employees	80
Amenity and Adventure Centers	80
RV Park	80
Business Center	80

Table 4-2: Infiltration/Inflow as a Percentage of Maximum Month Wastewater Production – SEIS Alternative 6

Month	Infiltration/Inflow, Percentage of Wastewater Production
January	20
February	25
March	25
April	15
May	15
June	10
July	10
August	10
September	10
October	10
November	10
December	15

Usual practice is to estimate infiltration/inflow rates as a maximum value on a per acre basis. However, seasonally varying infiltration/inflow (I/I) rates have been used to estimate the monthly I/I return flow component for the water supply analysis. Very little inflow is expected, as the 47° North development under SEIS Alternative 6 will prohibit discharge of stormwater to the sanitary sewer system. Ecology's standard residential unit rate of 100 gpcd includes an allowance for normal infiltration. From **Table 4-1,** the normal wastewater is 80 percent times the water demand of 100 gpcd, or 80 gpcd. From **Table 4-2,** the normal maximum seasonal I/I allowance is 25 percent of maximum month wastewater generation. Using the 80 gpcd inside generation for the maximum month and the 25 percent I/I allowance, the seasonal maximum wastewater generation would be:

80 gpcd + 25 percent x 80 gpcd = 100 gpcd.

This is the same value as recommended by Ecology for new sewer systems in the 2008 Criteria for Sewage Works Design.

Wastewater generation for single and multi-family units are summarized in **Tables 4-3** and **4-4,** respectively.

Table 4-3: Wastewater Generation - Single Family, SEIS Alternative 6

Parameter	Primary Residences
Party Size	2.34
Unit Water Demand (gpdpc)	100
Wastewater Production Percentage	80%
Total Wastewater Production (gpd)	187

Table 4-4: Wastewater Generation - Multi-family, SEIS Alternative 6

Parameter	Primary Residences
Party Size	2.34
Unit Water Demand (gpdpc)	100
Wastewater Production Percentage	90%
Total Wastewater Production (gpd)	211

The original party value used in the 2002 SETR was 2.4 people per household. The party value was updated to 2.34 persons per household based on current US Census figures.

Commercial development wastewater production, which is assumed at 80 percent of inside water use, was assumed to be 0.068 gallons per day per square foot of the building in the 2002 EIS SETR. There was no updated information available since the 2002 EIS SETR, so this rate will continue to be used.

Similarly, for the RV park under SEIS Alternative 6, the following 2002 EIS SETR will be continued to be used: a daily wastewater production of 120 gpd per site was used. This is based on 3 persons

per campsite, 50 gpd per person water demand and an 80 percent wastewater fraction of water demand.

For visitor and employees under SEIS Alternative 6, 16 gpd per person was used based on a water demand of 20 gpd per person and an 80 percent wastewater fraction of water demand. There was no updated information available since the 2002 EIS SETR, so this rate will continue to be used. For the amenity and adventure centers, a total of 500 visitors and 125 employees are estimated per day. For the commercial development under SEIS Alternative 6, a total of 500 visitors and 377 employees are estimated per day.

The projected monthly wastewater flows at buildout under SEIS Alternative 6, FEIS Alternative 5 and SEIS Alternative 5 are provided in **Table 4-5.**

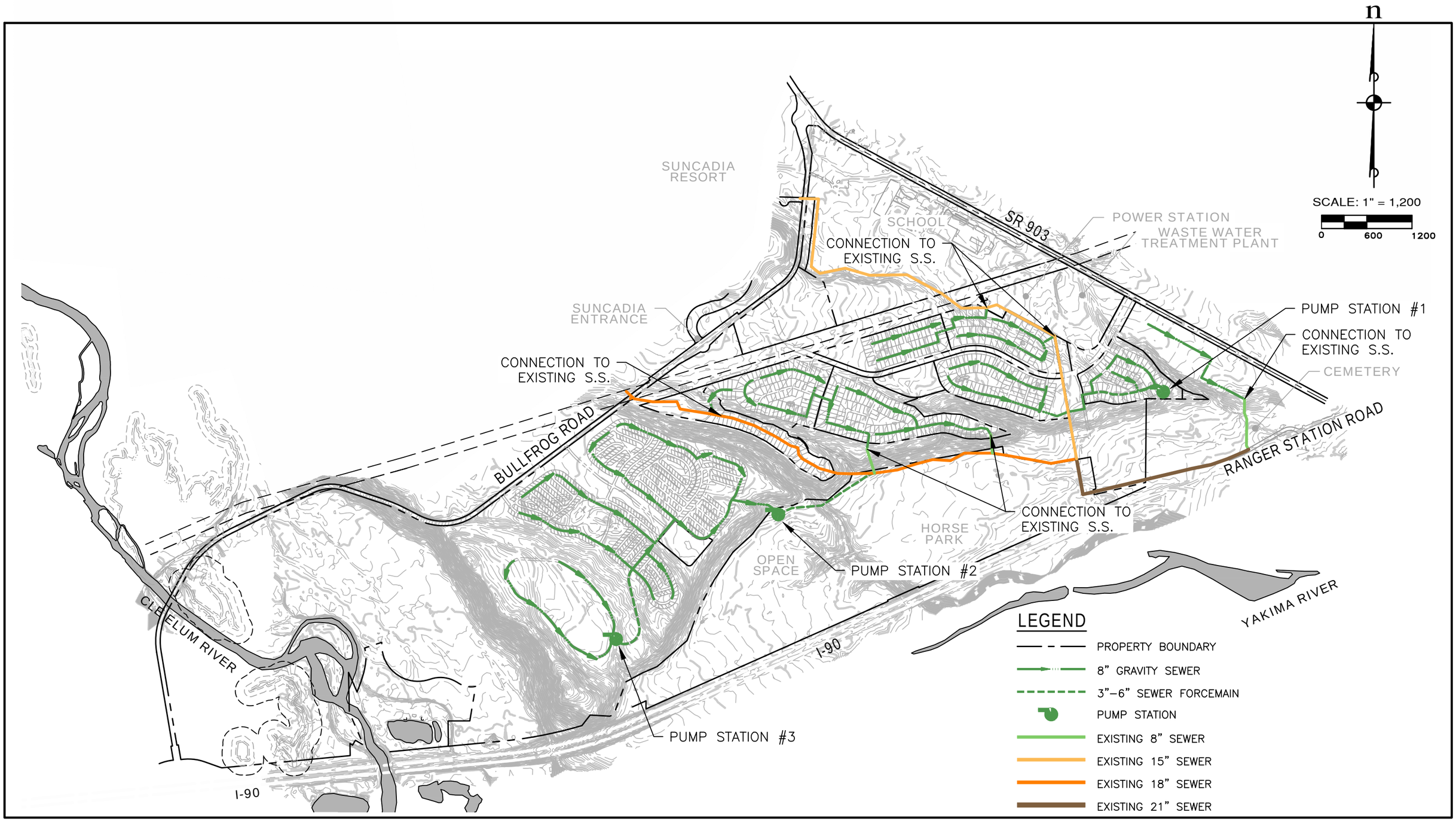
Table 4-5: Monthly Wastewater Flow at Buildout, mgd[a]

Alt.	Year	Jan	Feb	Mar	April	May	June	July	Aug	Sept	Oct	Nov	Dec	Average Annual
SEIS 6	30 w/o I/I [b]	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19	0.19
SEIS 6	30 w/ I/I	0.23	0.24	0.24	0.22	0.22	0.21	0.21	0.21	0.21	0.21	0.21	0.22	0.22
FEIS 5[c]	30 w/o I/I	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25	0.25
FEIS 5[c]	30 w/ I/I	0.30	0.32	0.31	0.29	0.28	0.27	0.27	0.27	0.27	0.27	0.27	0.28	0.28
SEIS 5[c]	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 5[c]	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

[a] Includes wastewater flows from the commercial development.

[b] I/I represents infiltration and inflow, which varies by month from 10 percent to 25 percent of maximum month inside wastewater production.

[c] Excludes Reserve Area.



Source: ESM Consulting Engineers, 2020.

EA Engineering, Science, and Technology, Inc., PBC

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Figure 4-1

Preliminary Sewer Plan - SEIS Alternative 6

4.2 Collection and Conveyance System

The existing and proposed preliminary sewer systems layout for SEIS Alternative 6 are shown on **Figure 4-1**.

An existing sewer trunk system network traverses the site to provide service to Suncadia and the proposed development. This existing sanitary sewer system consists of 15- and 18-inch diameter sewer mains that border the east and south sides of the property, respectively, and are available to serve the proposed 47° North development. The 18-inch diameter sewer main has 8-inch diameter stub-outs designed and constructed to serve future development. The two sewer mains connect to the southeast and continue east along an existing 21-inch diameter sanitary trunk system that follows Douglas Munro Blvd and connects with the South Cle Elum trunk sewer.

The 47° North single and multi-family development, as well as the associated amenity and adventure centers under SEIS Alternative 6 are proposed to be served by private 8- to 12-inch diameter gravity sanitary sewer mains that would be owned, operated, and maintained privately.

The 47° North RV park development under SEIS Alternative 6 is proposed to be served by private 8-inch diameter gravity sanitary sewer mains that would also be owned, operated, and privately maintained by the owner. These gravity sewer mains would connect to sewer lift stations that would flow via a force main (3 inches to 6 inches in diameter), all owned, operated, and maintained privately to the existing 18-inch diameter sewer main.

The commercial development under SEIS Alternative 6 will be served by public 8-inch diameter gravity sewer mains that will be owned, operated, and maintained by the City of Cle Elum.

The topography of the site requires two estimated lift stations for SEIS Alternative 6 to transport sewage from lower to higher elevations, as shown in **Figure 4-1**. Preliminary design conditions for each sewage lift station with 5 hp or more requirements are presented in **Table 4-6.**

Table 4-6: Preliminary SEIS Alternative 6 Lift Station Design Parameters

Alternative	Lift Station No.	Capacity (gpm)	Elevation Head (ft)
6	1	50	26
	2	450	22
	3	140	42

4.3 Wastewater Treatment and Disposal

4.3.1 Flows and Loadings

Estimated wastewater flows for buildout of SEIS Alternative 6, FEIS Alternative 5, and SEIS Alternative 5 are provided in **Tables 4-7, 4-8** and **4-9** respectively. A peak hourly factor of 3.5 was used, matching the 2002 EIS calculations.

Table 4-7: Projected Wastewater Flows for SEIS Alternative 6, mgd[a]

Flow Condition	Buildout
Annual Average	0.22
Wet Weather (Oct.-Apr.):	
Average	0.22
Peak Hourly	0.77
Dry Weather (May-Sept.):	
Average	0.21
Peak Hourly	0.74

[a] Includes I/I and wastewater flows for the commercial development.

Table 4-8: Projected Wastewater Flows for FEIS Alternative 5, mgd[a,b]

Flow Condition	Buildout
Annual Average	0.36
Wet Weather (Oct.-Apr.):	
Average	0.37
Peak Hourly	1.28
Dry Weather (May-Sept.):	
Average	0.35
Peak Hourly	1.21

[a] Includes wastewater flows for non-Trendwest demands located in the UGA.

[b] Excludes reserve area.

Table 4-9: Projected Wastewater Flows for SEIS Alternative 5, mgd[a,b]

Flow Condition	Buildout
Annual Average	0.35
Wet Weather (Oct.-Apr.):	
Average	0.36
Peak Hourly	1.26
Dry Weather (May-Sept.):	
Average	0.34
Peak Hourly	1.19

[a] Includes wastewater flows for non-Trendwest demands located in the UGA.

[b] Excludes reserve area.

Estimated wastewater loadings, in terms of biochemical oxygen demand (BOD) and total suspended solids (TSS) are given in **Table 4-10**. These loadings are based on a unit loading for BOD and TSS of 0.2 pounds per day per person. Population for SEIS Alternative 6 was calculated as follows: 1,654 people for residential areas (707 residences x 2.34 people per residence), 941 people at the RV park (627 x 3 people per site x 50 percent occupancy), 500 visitors, and 377 employees for the commercial development for a total of 3,472 people.

Table 4-10: Projected Loadings, lb. per day[a]

Alternative No.	BOD&TSS	Buildout
SEIS Alt. 6	Annual Average	694
	Max. Month Average (Aug.)	733
FEIS Alt. 5[b]	Annual Average	720
	Max. Month Average (Aug.)	760
SEIS Alt. 5[b]	Annual Average	699
	Max. Month Average (Aug.)	738

[a] Includes wastewater flows for commercial development demand.

[b] Excludes Reserve Area.

4.4 Wastewater Treatment and Disposal Alternatives

The City of Cle Elum does not currently have an adopted General Sewer Plan. However, preparation of a General Sewer Plan is in process with completion anticipated in April 2022. The 47° North site is in the City of Cle Elum's sewer service area.

The City of Cle Elum completed the construction of a new 3.6 million gallon per day Sequential Batch Reactor (SBR) wastewater treatment plant in the spring of 2005. This new SBR plant, which is called the Upper Kittitas County Regional Wastewater Treatment Facility (WWTF), has replaced the old lagoon treatment system and it now provides wastewater treatment for the following entities:

- City of Cle Elum and its UGA
- Town of South Cle Elum
- City of Roslyn
- Community of Ronald (and its nearby unincorporated areas)
- Existing Units in Pine Loc III
- Suncadia Resort

FEIS Alternative 5 of the 2002 EIS SETR was included as a community planned to be serviced by this facility.

4.5 Preliminary Sewer Plans Summary

The proposed SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment development sewer demand is less than FEIS Alternative 5 and about equal to SEIS Alternative 5 because population per household was reduced from 2.4 to 2.34 people per unit. Furthermore, the proposed RV use and commercial development footprint generate less demand than the uses previously contemplated. The existing treatment facilities were designed to include the proposed development. Therefore, no significant impacts are anticipated, and no mitigation is proposed other than what is already required by current codes.

This section estimates the expected sources and quantities of solid wastes that would be generated by the proposed SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment and compared to the FEIS Alternative 5 estimates as evaluated in the 2002 EIS SETR and SEIS Alternative 5.

5.1 Solid Waste Sources and Classifications

The sources of solid waste for SEIS Alternative 6 were identified in the following categories.

5.1.1 Construction and Demolition Debris (C&D):

Construction and demolition debris (C&D) was described in the 2002 EIS SETR as Construction and Inert Waste (CDL) and includes waste material that is produced in the process of construction of new structures. Structures include buildings of all types, both residential and nonresidential, as well as roads, utilities and bridges. It should be noted that construction wastes from renovation or demolition of existing structures are estimated to be minor through buildout and are, therefore, not estimated.

5.1.2 Residential

Residential solid waste would be generated from the single-family residences, multi-family units, and in the RV park.

5.1.3 Commercial

Commercial solid waste would be generated from the amenity and adventure centers as well as the commercial development.

5.1.4 Streets and Recreation Areas

This source includes waste from all internal roadways and recreation areas.

5.1.5 Water and Wastewater Treatment

This source includes waste from the water and wastewater treatment facilities and was included in the 2002 EIS SETR. There are no proposed water and wastewater treatment facilities as part of SEIS Alternative 6 and therefore no associated waste.

5.2 Classification of Solid Wastes

The solid wastes that will be generated for SEIS Alternative 6 are classified as follows.

5.2.1 Construction and Demolition Debris (C&D)

This waste stream is composed of both construction and demolition wastes, each of which includes inert and non-inert components.

"Demolition waste" means solid waste, largely inert waste, resulting from the demolition or razing of buildings, roads and other man-made structures. Demolition waste consists of, but is not limited to, concrete, brick, bituminous concrete, wood and masonry, composition roofing and

roofing paper, steel, and minor amounts of other metals like copper. Plaster (i.e., sheet rock or plaster board) or any other material, other than wood, that is likely to produce gases or a leachate during the decomposition process and asbestos wastes are not considered to be demolition waste for the purposes of this regulation (WAC 173-304-100(19)).

"Inert wastes" means noncombustible, nondangerous solid wastes that are likely to retain their physical and chemical structure under expected conditions of disposal, including resistance to biological attack and chemical attack from acidic rainwater (WAC 173-304- 100(40)).

Specific components of demolition waste - drywall, plaster, wood, and asphalt shingles - are not considered inert waste. Neither drywall nor wood waste are considered C&D for disposal. Drywall must be disposed of as municipal solid waste. Wood waste can be recycled, given away, converted to wood chips, or disposed of as municipal solid waste.

5.2.2 Municipal Wastes

These include food wastes and rubbish. Food wastes are the animal, fruit, or vegetable residues resulting from the handling, preparation, cooking, and eating of foods. They are generated from the residential and commercial land uses.

Rubbish consists of combustible and noncombustible solid wastes of households, institutions, and commercial activities, excluding food wastes or other highly putrescible materials. It is produced by the residential, commercial and recreational land uses.

5.2.3 Hazardous/Moderate Risk Wastes

These include chemical, biological, flammable, explosive, or radioactive wastes that pose a moderate risk, immediately or over time, to human, plant, or animal life. For SEIS Alternative 6, moderate risk wastes will be generally produced by households and commercial operations in small quantities. These waste materials include many common products, such as:

- Oil based and water-based paints
- Paint thinners and solvents
- Adhesives, glues and sealant
- Brake fluid and antifreeze
- Used motor oil
- Car batteries
- Pesticides/herbicides
- Unwanted fuels (gasoline, kerosene)

5.2.4 Biosolids/Septage

Biosolids include the solid and semi-solid wastes from water and wastewater treatment facilities in this classification. Septage (the combination of sludge, scum, and liquid pumped from septic tanks) is also included in this classification.

5.2.5 Yard Waste

This includes leaves, grass clippings, brush, garden waste, tree trunks, holiday trees, and pruning from trees or shrubs. Yard waste results from the care and maintenance of landscaped areas. It is mostly generated by residential, commercial, street, and recreational land uses.

5.2.6 Land Clearing

Land clearing waste includes trees and vegetation removed for construction, but not sold as timber.

5.3 Waste Stream Quantities and Management

The waste stream quantity estimates from SEIS Alternative 6 are presented in this section.

5.3.1 C&D Waste Generation Estimate

C&D wastes were estimated at 4.38 lbs per sf of new construction for residential areas and 3.89 lbs per sf of new construction for non-residential areas (2002 EIS SETR - EPA, "Characterization of Building-Related Construction and Demolition Debris in the United State," 1998). This original estimate is likely too conservative, because both single and multi-family units proposed as part of the 47° North development will be constructed offsite and hauled in. However, there are no updated C&D waste rates found, so this rate will be used.

Based on the 2011 Kittitas County Solid Waste Management Plan Overall Waste Composition, C&D is comprised of the following: 2 percent concrete, 7 percent asphalt paving, 17 percent asphalt roofing, 22 percent clean wood waste, 17 percent other wood waste, 9 percent gypsum board, 3 percent rock, soil and fines, and 23 percent composite materials.

The residential building areas for FEIS Alternative 5 and SEIS Alternative 5 are estimated to be the same because the same residential units were proposed in both alternatives.

The residential building areas for SEIS Alternative 6 were calculated using 1,800 sf per residential single-family home (527 units) and 2,550 sf per multi-family cluster unit (60 units). Quantity estimates are based on these rates and the building areas given in **Tables 5-1** and **5-2**.

Table 5-1: Estimated Residential Building Areas

Residential Building Area, sf	
SEIS Alternative 6	FEIS & SEIS Alternative 5[a]
1,102,000	2,719,000

[a] Excludes buildings in 175-acre reserve parcel, for which uses are undefined.

The commercial development areas for FEIS Alternative 5 and SEIS Alternative 5 are the same.

Table 5-2: Estimated Non-Residential Building Areas

	Total Building Area, sf	
Facility	**SEIS Alternative 6**	**FEIS & SEIS Alternative 5[a]**
Water Treatment Plant	-	13,000
SF and MF Amenity Center	31,000	-
Adventure Center	3,500	-
General Maintenance Building	-	9,000
RV Amenity Center	31,000	-
Community Center	-	10,000
Commercial Development	150,000	950,000
RV Park/Temporary RV Park	18,500	2,500[b]
Residential Recreation Buildings/Neighborhood Center	-	12,500
Total	**234,000**	**997,000**

[a] Excludes Reserve Area.
[b] Temporary RV park.

Estimated total build-out C&D quantities are given in **Table 5-3**. Since residential and non-residential units are the same for both FEIS Alternative 5 and SEIS Alternative 5, the associated C&D quantities are the same as well.

Table 5-3: Projected C&D Generation Rates and Total Quantity at Full Buildout, tons

	SEIS Alternative 6		FEIS & SEIS Alternative 5[a]	
	Residential	**Non-residential**	**Residential**	**Non-residential**
Buildout Total (tons)[b]	2,413	455	5,955	1,939

[a] Excludes Reserve Area.
[b] Buildout total represents the cumulative total quantity for Alternative 6 by year 2037 and for FEIS & SEIS Alternative 5 by year 2051.

The proposed SEIS Alternative 6 will generate significantly less C&D based on building square footage, for both residential and non-residential construction, because the proposed development square footage is significantly smaller. Furthermore, both single family and multi-family units proposed as part of the 47° North development will be constructed offsite and hauled in. The generation estimates presented in **Table 5-3** do not include wastes from road, utility, and non-building structure construction. Estimating criteria for this waste stream was not found in the literature. However, the magnitude of this waste stream is expected to be minor.

Inert C&D waste will be collected on-site and hauled directly to the Kittitas County Inert/Demolition Debris Waste Landfill at Ryegrass. Non-inert C&D wastes will be collected on-

site and hauled to the Cle Elum Transfer Station (also known as the Upper County Transfer Station) for disposal. Non-inert construction waste will be hauled to Kittitas County-owned transfer stations. A C&D recycling program will be developed that will require participation of all contractors working on the 47° North development. The program will be approved by the Kittitas County Solid Waste Department prior to the start of construction.

5.3.2 C&D Management Provisions

C&D collection points will be at locations specified by the City of Cle Elum through its building permit process. Inert and non-inert waste will be handled as described below.

5.3.3 Inert Wastes

Drop boxes will be maintained on-site for temporary storage of inert wastes during construction. Inert wastes collected in drop boxes will be hauled directly to the permitted Ryegrass landfill by the contractors or by Waste Management by agreement with the contractors. The recyclable materials will be segregated from the waste stream on-site.

5.3.4 Non-Inert Wastes

Non-inert wastes will be temporarily stored in separate drop boxes on-site until hauled to the Cle Elum Transfer Station. The wastes except for the recyclables will then be transported to the Greater Wenatchee Landfill, Douglas County for the final disposal. Recyclable materials will be segregated from the waste stream as discussed for inert wastes.

5.3.5 Wood Wastes

Construction wood waste will be handled on-site. Wood wastes will not be hauled to the Kittitas County municipal solid waste facilities. Wood waste will be given away as firewood, chipped, or recycled.

5.3.6 Municipal and Other Wastes

For residential solid waste, a generation rate of 5.45 lbs per person per day was originally used (2002 SETR - 1999 Washington State). According to the Kittitas County 2020 Solid Waste and Moderate Risk Waste Management Plan, the 2017 rate was 4.33 lbs per person per day. According to the EPA Advancing Sustainable Materials Management: Facts and Figures 2013, the 2013 rate was 4.40 lbs per persons per day. The more current 4.40 lbs per person per day was applied to SEIS Alternative 5 and SEIS Alternative 6 for residential areas and RV park areas.

For street and alley cleaning solid waste, a generation rate of 0.25 lb per person per day was originally used (2002 SETR - Tchobanoglous, "Solid Waste Management: Engineering Principles and Management Issues", 1993). There were no updated generation rates found, so this rate was applied to the residential areas and RV park areas.

For yard waste, a generation rate of 0.44 lbs per person per day was originally used (2002 EIS SETR - EPA, *Decision-Maker's Guide to Solid Waste Management*, Second Edition, 1995). According to the Kittitas County 2020 Solid Waste and Moderate Risk Waste Management Plan,

the 2017 yard waste was 0.30 lbs per person per day. The more current 0.30 lbs per person per day was applied to SEIS Alternative 5 and SEIS Alternative 6 for residential areas and RV park areas.

Household hazardous/moderate waste was originally estimated based on 1997-1999 Kittitas County records at 0.13 lbs per person per day. The 2011 Kittitas County Solid Waste Management Plan states that households generated an annual average of 233 tons for 2008. Based on a population of 39,365 in 2008, this is equivalent to a daily average of 0.08 pounds per household or 0.03 pounds per person per day. The more current 0.03 lbs per persons per day was applied to SEIS Alternative 5 and SEIS Alternative 6 for residential areas and RV park areas.

The original party value used in the 2002 SETR was 2.4 people per household. The party value was updated to 2.34 persons per household based on current US Census figures for SEIS Alternative 5 and SEIS Alternative 6.

The original occupancy percentage is estimated to have been 100 percent in the 2002 UGA EIS for solid waste production. This occupancy percentage has been revised to 90 percent for residential units. A 50 percent occupancy will be estimated for the RV park.

For the commercial development, the waste stream quantities have been estimated based on a generation rate of 0.16 lbs per person per day (2002 EIS SETR - Tchobanoglous, "Integrated Solid Waste Management: Engineering Principles and Management Issues," 1993). There were no updated generation rates found for this use, so this rate was applied based on the number of employees. Since no current data is available and the commercial development waste is a small portion of the overall generated solid waste, the total estimated buildout commercial development solid waste was added to the municipal waste portion of each buildout year.

Total yearly projections of solid waste generation are presented in **Table 5-4**.

Table 5-4: Solid Waste Production (tons/year)

Buildout Year	SEIS Alternative 6	FEIS Alternative 5[a]	SEIS Alternative 5[a]
Municipal	1,520	1,635	1,595
Yard	97	102	100
Hazardous/Moderate Risk [b]	10	10	10
Total Year 2025 (tons/year)	**1,627**	**1,747**	**1,705**
Municipal	2,042	1,997	1,948
Yard	131	126	123
Hazardous/Moderate Risk [b]	13	13	12
Total Year 2030 (tons/year)	**2,186**	**2,136**	**2,083**
Municipal	2,042	2,311	2,254
Yard	131	146	142
Hazardous/Moderate Risk [b]	13	15	14
Total Year 2037 (tons/year)	**2,186**	**2,472**	**2,410**
Municipal	2,042	2,765	2,697
Yard	131	175	171
Hazardous/Moderate Risk [b]	13	18	17
Total Buildout (tons/year)[c]	**2,186**	**2,958**	**2,885**

[a] Excludes Reserve Area.

[b] Includes non-residential hazardous waste.

[c] Buildout total represents the cumulative total quantity for Alternative 6 by year 2037 and for Alternative 5 by year 2051.

5.3.7 Management Provisions

The 47° North development will generate an estimated 2,186 tons of municipal solid wastes annually at full buildout under SEIS Alternative 6. Waste Management of Ellensburg or its successors will collect the wastes. The methods and points of connection will vary by type of use and accommodation. The principal arrangements are likely to be as follows:

Accommodation/Area	Collection Responsibility	Collection Point
Single family residential	Residents	Curb-side pickup by Waste Management
Multi-family residential	Residents	Central dumpsters
Amenity and Adventure Centers, Commercial Development, and RV park areas	Operators/tenants	Central dumpsters

The wastes will then be hauled to the Cle Elum Transfer Station prior to transport to the Greater Wenatchee Landfill in Douglas County for final disposal.

Yard waste disposal by residents will be by curb-side pickup by Waste Management, or self-haul to an allowable transfer station. Yard waste disposal for commercial operators/tenants will be the responsibility of their commercial landscape services.

Streets will be cleaned periodically in accordance with City of Cle Elum practices.

Hazardous/moderate risk wastes will be disposed of by residents and commercial operators/tenants at local community-sponsored turn-in events.

5.3.8 Recycling

Chapter 70.95 RCW establishes statewide recycling and waste reduction goals. A goal of 50 percent was established by 2007. No new additional goals have been noted since. According to the Kittitas County 2020 Solid Waste and Moderate Risk Waste Management Plan, 2017 recycling rate for Kittitas County was 11.4 percent, a significant decrease from the 27.8 percent in 2008. Materials that had a decrease in the quantity recycled include cardboard, ferrous metal, nonferrous metal, cooking oil, and used oil.

The City of Cle Elum does not have curbside recycling at this time. Residences in the area self-haul recycling to transfer stations.

Recycling within the 47° North development will be encouraged. Many of the residents will move from areas with effective recycling programs and will expect similar programs to be in place. Preliminarily, the recycling program elements are expected to include recycle bins at each central dumpster location for use by residents and commercial operators/tenants. It is recommended that the dumpster/recycle stations be designed so that the dumpsters can be removed without moving the recycling containers. These stations will receive aluminum cans, corrugated cardboard, glass, magazines, newspaper, plastic milk jugs, plastic pop bottles, and tin cans. The destination(s) of these materials will be determined at a later date.

5.3.9 Septage Wastes

Septage wastes are not proposed for SEIS Alternative 6.

5.3.10 Land Clearing Wastes

It is not anticipated that any wastes generated from land clearing operations under SEIS Alternative 6 or SEIS Alternative 5 will be hauled to Kittitas County solid waste facilities. Land clearing wastes remaining after removal of saleable timber will likely be burned, given away as free firewood, or chipped on-site. Chipped wood wastes could be marketed as pulp material or made available free of charge to the public.

5.3.11 Waste Loading Impacts

Based on data presented in **Table 5-3** and **5-4**, SEIS Alternative 6 generates less quantities of C&D and MSW than FEIS Alternative 5 and SEIS Alternative 5. The reason for the smaller quantities is because both residential and commercial development square footages are smaller in the SEIS Alternative 6.

5.3.12 Cle Elum Transfer Station

Based on communication with Kittitas County Solid Waste, the Cle Elum Transfer Station is reported by Kittitas County to have processed 11,096 tons of waste in 2019. Customers made a total of 40,119 deliveries to the transfer station. The station is reported to be near capacity, based on the number of cars queued at the station on Saturdays. Tuesdays and Saturdays are the busiest days at the station, as it is closed Sundays and Mondays.

Kittitas County Solid Waste is currently working on another station entrance to improve queuing.

5.3.13 Ryegrass Landfill.

C&D inert wastes will be hauled to the landfill at the Ryegrass site for disposal. Kittitas County Solid Waste is currently working on the expansion for this facility.

5.3.14 Solid Wastes Projections

About 5 percent of the C&D wastes is estimated to be inert and hauled to the landfill, which is calculated at 143 tons for the buildout condition (without recycling).

Based on the 2020 Solid Waste and Moderate Risk Waste Management Plan, 38,282 tons of municipal solid waste would be processed in year 2025. SEIS Alternative 6 municipal solid wastes would add 1,623 tons (without recycling), or 4 percent. Similarly, for year 2030, 40,234 tons of municipal solid waste would be processed and SEIS Alternative 6 would add 2,181 tons, or 5 percent. For year 2037, which is also the buildout condition, 43,137 tons of municipal solid waste would be processed and SEIS Alternative 6 would continue to add the same 2,181 tons, or 5 percent.

An effective recycling program would likely reduce both C&D and municipal solid waste volumes substantially. At a minimum, it is estimated to have at least a 10 percent reduction in waste due to recycling.

5.4 Solid Wastes Summary

The proposed SEIS Alternative 6 – Proposed 47° North Master Site Plan Amendment development solid waste generation is less than FEIS Alternative 5 and SEIS Alternative 5 because the proposed development square footage is significantly smaller. The estimated impact may be further reduced with an effective recycling program for both C&D and municipal solid waste streams.

Kittitas County Solid Waste will confirm whether or not the 47° North development is responsible to mitigate impacts for its proportional share of the costs associated with improvements to the Cle Elum Transfer Station and the Ryegrass Landfill.

Appendix

HLA
Engineering and Land Surveying, Inc.

* MEMORANDUM *

Phone: (509) 966-7000 / FAX: (509) 965-3800
2803 River Road, Yakima, WA 98902

Date: April 5, 2021

Project No.: 19055E

To: ESM Consulting Engineers
33400 8th Avenue South, Suite 205
Federal Way, 98003

Attention: Laura Bartenhagen
Project Manager

From: Benjamin A. Annen, PE

Re: 47° North Development – Updated Water System Analysis with Revised ADD per Service

Sun Communities (Developer) has proposed the 47° North (47N) residential development on approximately 1,100 acres in the Bull Frog Flats area of the City of Cle Elum (City) within the City Limits. 47N intends to connect to the City's domestic water system as a single customer, while maintaining a private on-site water system. To determine water system impacts of the 47N development, HLA has conducted preliminary storage and pump analysis for the Cle Elum water system as a whole, as well as Pressure Zone 3, which is the primary location of the development.

As the 2015 Water System Plan (2015 WSP) update is in the early stages of development and incomplete, projection data from the 2015 WSP was used to develop current condition estimates. The 2019 projections presented in the 2015 WSP were assumed to be the best representation of current conditions including background growth.

Water Demand

The current water system demand by pressure zone, assumed to equal 2019 projections, are summarized in Table 1.

To allow for direct comparison to the 2019 projections, two proposed major developments were converted to Equivalent Residential Units (ERUs) based on the demands recorded in 2015 WSP Table 2-27:

- 207 gallons per day (gpd) Average Annual Demand (ADD) per 1.0 ERU
- 689 gpd Maximum Day Demand (MDD) per 1.0 ERU

The two proposed major developments included the City Heights (CH) development and the 47N development, both with active Development Agreements. As the 47N development is anticipated to be built-out in 2037 and the CH development build-out for 2040, total maximum CH ERUs were estimated for 2037 at 85% of full build-out.

The 47N development is considered SEIS Alternative 6 and is compared to the no action, Bullfrog Flats Adopted Master Plan, SEIS Alternative 5 (Alt 5). The projected 2037 water demand for CH, 47N (SEIS Alt 6), and SEIS Alt 5 are summarized in Table 2, Table 3, and Table 4, respectively.

In the Draft Supplemental Environmental Impact Statement (DSEIS), water demand from the single- and multi- family manufactured homes and RV units under the 47N Proposed Master Site Plan Amendment (SEIS Alt 6) was based on the Washington State Department of Health, Water System Design Manual standards; equating to 211 gpd for single- and multi- family, and 75 gpd for RV units. This was comparable to historical City of Cle Elum single-family home water demand data of 207 gpd as presented above. However, this was a very conservative approach as manufactured homes historically have lesser demands than single-family homes based on national data.

For the Final Supplemental Environmental Impact Statement (FSEIS), the Applicant provided a substantial amount of water demand data from over 60 Sun Community resorts across the country. The City reviewed this data, and revised the development's projected water demands, including factor of safety provisions; equating to 170 gpd for single- and multi- family, and 60 gpd for RV units, as presented in Table 3. These rates are higher than any of the other Sun Community resorts, and so still are considered conservative, but are lower than Cle Elum's historical single-family demands.

Table 1: Current Water Demand (2019)

Zone	No. of Services[a]	Annual Demand[a] *gpy*	Total ADD[b] *gpd*	ADD ERUs[c]	Total MDD[a] *gpd*	MDD ERUs[d]	Peak Hour Demand[a] *gpm*
1	1,164	147,149,750	403,150	*Non-applicable*	1,298,088	*Non-applicable*	1,803
2	284	60,798,780	166,572	*Non-applicable*	619,795	*Non-applicable*	861
3	364	168,043,810	460,394	2,224	1,580,175	2,293	2,195
Total	1,812	375,992,340	1,030,116	4,976	3,498,058	5,082	4,907

[a] Values from 2015 WSP Table 2-36

[b] Divide Annual Demand by 365 days per year

[c] Divide Annual Day Demand by 207 gpd/ERU

[d] Values from 2015 WSP Table 2-31

Table 2: Projected Water Demand for City Heights at 85% Buildout

	Zone	No. of Services[a]	ADD/Service[b] *gpd*	Total ADD[c] *gpd*	ADD ERUs/Service[b]	ADD ERUs[d]	MDD/Service[b] *gpd*	Total MDD[e] *gpd*	MDD ERUs/Service[b]	MDD ERUs[f]	Peak Hour Demand[g] *gpm*
Single Family Residences	3	438	207	90,614	1.0	438	689	301,610	1.00	438	419
Multi-Family Units	3	128	691	88,103	3.3	426	1,329	169,448	1.93	246	235
Subtotal	-	565	-	178,717	-	863	-	471,057	-	684	654

[a] Values from Conceptual Water Systems Connections for City Heights – 85% of maximum units for Zones 3 and 4

[b] Values from 2015 WSP Table 2-27

[c] Multiply number of services by ADD per service.

[d] Multiply number of services by ADD ERUs/service.

[e] Multiply number of services by MDD per service.

[f] Multiply number of services by ADD ERUs/service.

[g] MDD divided by 1,440 then multiplied by 2.

Table 3: Projected Water Demand for 47° North at Full Buildout

	Zone	No. of Services[a]	ADD/Service[a] *gpd*	Total ADD[b] *gpd*	ADD ERU/Service[c]	ADD ERUs[d]	MDD/Service[e] *gpd*	Total MDD[f] *gpd*	MDD ERUs/Service[g]	MDD ERUs[h]	Peak Hour Demand[i] *gpm*
Business Park and Irrigation[j]	2	1	15,020	15,020	72.56	73	50,017	50,017	72.59	73	69
Single and Multi-Family Units	3	707	170 [k]	120,190	0.82	581	340	240,380	0.49	349	334
RV Units	3	627	60 [k]	37,620	0.29	182	120	75,240	0.17	109	105
Amenity Center	3	1	6,000	6,000	28.99	29	12,000	12,000	17.42	17	17
Residential Irrigation[j]	3	1	45,405	45,405	219.35	219	151,198	151,198	219.45	219	210
Subtotal	-	1,337		224,235		1,083		528,836		768	734

[a] Values from Section 3 Preliminary Water Plans, ESM Consulting Addendum to the Site Engineering Technical Report for 47° North.

[b] Multiply number of services by ADD per service.

[c] Divide ADD/service by 207 GPD per ADD ERU from 2015 WSP Table 2-27.

[d] Multiply number of services by ADD ERUs/service.

[e] Multiply ADD/service by 3.33 peaking factor from ESM SETR Section 3, Table 3-7: Peaking Factor (Business Park and Irrigation and Residential Irrigation) and 2.0 peaking factor per DOH Water System Design Manual (Single/Multi-family Units, RV Units, and Amenity Center).

[f] Multiply number of services by MDD per service.

[g] Divide GPD/service by 689 GPD per MDD ERU from 2015 WSP Table 2-27.

[h] Multiply number of services by MDD ERUs/service.

[i] MDD divided by 1,440 then multiplied by 2.

[j] ADD irrigation demand estimated as average maximum allowable irrigation flows for all 12 months.

[k] ADD per service as supported by consumption documentation for comparable Sun Communities sites across the country.

Table 4: Projected Water Demand for SEIS Alt 5 at Full Buildout

	Zone	No. of Services[a]	ADD/Service[b] *gpd*	Total ADD[c] *gpd*	ADD ERU/Service[d]	ADD ERUs[e]	MDD/Service[f] *gpd*	Total MDD[g] *gpd*	MDD ERUs/Service[h]	MDD ERUs[i]	Peak Hour Demand[j] *gpm*
Business Park and Irrigation[k,l]	2	1	15,020	15,020	72.56	73	50,017	50,017	72.59	73	69
Business Park and Irrigation[k,m]	3	1	80,108	80,108	387.00	387	266,760	266,760	387.17	387	370
Single Family Units	3	810	211	170,910	1.02	826	703	569,130	1.02	826	790
Multi-Family Units	3	524	211	110,564	1.02	534	703	368,178	1.02	534	511
Amenity Center/ Clubhouse[n]	3	1	6,000	6,000	28.99	29	19,980	19,980	29.00	29	28
Residential Irrigation[o]	3	1	68,107	68,107	329.02	329	226,797	226,797	329.17	329	315
Subtotal	-	1,338		450,710		2,177		1,500,863		2,178	2,085

[a] Values from 2002 EIS Table 2-5 Summary – Alternative 5

[b] Values from Section 3 Preliminary Water Plans, ESM Consulting Addendum to the Site Engineering Technical Report for 47° North

[c] Multiply number of services by ADD per service.

[d] Divide ADD/service by 207 GPD per ADD ERU from 2015 WSP Table 2-27.

[e] Multiply number of services by ADD ERUs/service.

[f] Multiply ADD/service by 3.33 peaking factor from ESM SETR Section 3, Table 3-7: Peaking Factor

[g] Multiply number of services by MDD per service.

[h] Divide GPD/service by 689 GPD per MDD ERU from 2015 WSP Table 2-27.

[i] Multiply number of services by MDD ERUs/service.

[j] MDD divided by 1,440 then multiplied by 2.

[k] ADD irrigation demand estimated as average maximum allowable irrigation flows for all 12 months from Section 3, Table 3-4: Maximum Allowable Irrigation Flows

[l] Zone 2 Business Park and Irrigation Demand assumed equivalent to 47N Zone 2 demands

[m] Zone 3 Business Park and Irrigation Demand assumed 5.33 times greater than Zone 2 (800,000 SF / 150,000 SF)

[n] Amenity Center and Neighborhood Clubhouse demand assumed equivalent to 47N Amenity and Adventure Center demands

[o] ADD irrigation demand estimated as 150% of 47N average maximum allowable flows for all 12 months from Section 3, Table 3-4: Maximum Allowable Irrigation Flows

Physical capacity of the total water system, including water rights, source, treatment, and storage capacity, was analyzed as part of the 2015 WSP in terms of ERU capacity. A Demand Rate per ERU for each system component was calculated with production values rather than consumption values to account for relatively high system loss (15-25%). The ERUs for 2012 (last year of complete data from 2015 WSP), estimated current conditions, and full buildout of CH (85%), 47N, and Alt 5, summarized below, allow for direct comparison to the original capacity analysis:

Table 5A: Summarization of ERUs – 47N

	ADD ERUs	MDD ERUs
2012	3,843	3,950
Current Conditions	4,976	5,082
City Heights	863	684
47º North	1,083	768
Proposed ERUs	1,947	1,451
Total	6,923	6,533

Table 5B: Summarization of ERUs – Alt 5

	ADD ERUs	MDD ERUs
2012	3,843	3,950
Current Conditions	4,976	5,082
City Heights	863	684
SEIS Alt. 5	2,177	2,178
Proposed ERUs	3,041	2,862
Total	8,017	7,944

Each analysis below was completed for two scenarios. Scenario A includes 2019 projections, CH development projections (at 85% of full buildout), and 47N projections. Scenario B includes 2019 projections, CH development projections (at 85% of full buildout), and SEIS Alt 5 projections.

Water Rights

Table 6 summarizes the water rights capacity analysis for 47N. The rights are granted by the existing development agreement with Suncadia Properties, which transfers Suncadia's existing water rights (included in current capacities below) as development and subsequent water demand occurs within the Cle Elum Bull Frog Flats area. This analysis includes the Bull Frog Flats area, or 47N, but includes only 140 units of the CH development as defined in the 2011 City Heights Annexation and Development Agreement. The revised ERU capacity for water rights with the 47N development is 2,043 and 3,496 for Annual and Instantaneous Rights, respectively.

Table 6A: Water Rights Analysis – 47N

Water Right	Current Capacity[a]		Demand/ERU[a]		Current Available ERU Capacity[b]	Proposed ERUs[c]	Revised Available ERU Capacity[d]
Annual (Q_a)	783	mg	0.095	mg	3,266	1,223	2,043
Instantaneous (Q_i)	4,667	gpm	0.492	gpm	4,404	908	3,496

[a] Values from 2015 WSP Table 2-35

[b] Divide current capacity by demand/ERU and subtract current ERUs

[c] 140 CH ERUs and all 47N ERUs from Table 5A

[d] Subtract proposed ERUs from current available ERU capacity

The revised ERU capacity for water rights with the Alt 5 development is 949 and 2,085 for Annual and Instantaneous Rights, respectively.

Table 6B: Water Rights Analysis –Alt 5

Water Right	Current Capacity[a]		Demand/ERU[a]		Current Available ERU Capacity[b]	Proposed ERUs[c]	Revised Available ERU Capacity[d]
Annual (Q_a)	783	mg	0.095	mg	3,266	2,317	949
Instantaneous (Q_i)	4,667	gpm	0.492	gpm	4,404	2,318	2,085

[a] Values from 2015 WSP Table 2-35
[b] Divide current capacity by demand/ERU and subtract current ERUs
[c] 140 CH ERUs and all Alt 5 ERUs from Table 5B
[d] Subtract proposed ERUs from current available ERU capacity

Source Analysis

Source capacity must be analyzed for raw water pumping capacity, total system finished water capacity, and Zone 3 finished water capacity.

Source (Raw Water)

Table 7 summarizes the source capacity analysis for the raw water pumps. There are no future improvements planned to increase source pumping capacity, which is the capacity of three 1,400 gpm pumps, or 4,200 gpm total. The revised ERU source capacity for raw water with the 47N development is 16,411 and 2,003 for ADD and MDD, respectively.

Table 7A: Source (Raw Water) Analysis – 47N

Total	Current Capacity[a]		Demand/ERU[a]		Current Available ERU Capacity[b]	Proposed ERUs[c]	Revised Available ERU Capacity[d]
ADD	4,200	gpm	0.18	gpm	18,357	1,947	16,411
MDD	4,200	gpm	0.492	gpm	3,455	1,451	2,003

[a] Values from 2015 WSP Table 2-35
[b] Divide current capacity by demand/ERU and subtract current ERUs
[c] Values from Table 5A
[d] Subtract proposed ERUs from current available ERU capacity

The revised ERU source capacity for raw water with the Alt 5 development is 15,317 and 593 for ADD and MDD, respectively.

Table 7B: Source (Raw Water) Analysis – Alt 5

Total	Current Capacity[a]		Demand/ERU[a]		Current Available ERU Capacity[b]	Proposed ERUs[c]	Revised Available ERU Capacity[d]
ADD	4,200	gpm	0.18	gpm	18,357	3,041	15,317
MDD	4,200	gpm	0.492	gpm	3,455	2,862	593

[a] Values from 2015 WSP Table 2-35
[b] Divide current capacity by demand/ERU and subtract current ERUs
[c] Values from Table 5B
[d] Subtract proposed ERUs from current available ERU capacity

Source (Total System Finished Water)

Table 8 summarizes the source capacity analysis for the finished water filter trains. Since the 2015 WSP, one of two new 2.0 mgd filter trains has been constructed, which increased the total capacity at the treatment plant to 4,500 gpm. With one filter train out of service (consistent with DOH standards), the finished water capacity is 3,100 gpm. The revised ERU source capacity for total system finished water with the 47N development is 10,300 and -232 for ADD and MDD, respectively.

Table 8A: Source (Total System Finished Water) Analysis – 47N

Total	Current Capacity[a]		Demand/ERU[b]		Current Available ERU Capacity[c]	Proposed ERUs[d]	Revised Available ERU Capacity[e]
ADD	3,100	gpm	0.18	gpm	12,246	1,947	10,300
MDD	3,100	gpm	0.492	gpm	1,219	1,451	-232

[a] Three 2.0 mgd filter trains at treatment plant and 300 gpm well, assumed one filter train out of service consistent with DOH standards
[b] Values from 2015 WSP Table 2-35
[c] Divide current capacity by demand/ERU and subtract current ERUs
[d] Values from Table 5A
[e] Subtract proposed ERUs from current available ERU capacity

The revised ERU source capacity for total system finished water with the Alt 5 development is 9,206 and -1,643 for ADD and MDD, respectively.

Table 8B: Source (Total System Finished Water) Analysis – Alt 5

Total	Current Capacity[a]		Demand/ERU[b]		Current Available ERU Capacity[c]	Proposed ERUs[d]	Revised Available ERU Capacity[e]
ADD	3,100	gpm	0.18	gpm	12,246	3,041	9,206
MDD	3,100	gpm	0.492	gpm	1,219	2,862	-1,643

[a] Three 2.0 mgd filter trains at treatment plant and 300 gpm well, assumed one filter train out of service consistent with DOH standards
[b] Values from 2015 WSP Table 2-35
[c] Divide current capacity by demand/ERU and subtract current ERUs
[d] Values from Table 5B
[e] Subtract proposed ERUs from current available ERU capacity

Source (Zone 3 Finished Water)

Table 9 summarizes the source capacity analysis for the Zone 3 finished water pumps. The water treatment plant currently includes two Zone 3, 1,400 gpm, finished water pumps. With one pump out of service (consistent with DOH standards), the pumping capacity to Zone 3 is 1,400 gpm. The ERU source capacity for Zone 3 finished water with the 47N development is 3,680 and -826 for ADD and MDD, respectively.

Table 9A: Source (Zone 3 Finished Water) Analysis – 47N

Total	Current Capacity[a]		Demand/ERU[b]		Current Available ERU Capacity[c]	Proposed ERUs[d]	Revised Available ERU Capacity[e]
ADD	1,400	gpm	0.18	gpm	5,554	1,874	3,680
MDD	1,400	gpm	0.492	gpm	553	1,379	-826

[a] Two 1,400 gpm finished water Zone 3 pumps, assume one pump out of service consistent with DOH standards
[b] Values from 2015 WSP Table 2-35
[c] Divide current capacity by demand/ERU and subtract current ERUs
[d] Values from Table 5A
[e] Subtract proposed ERUs from current available ERU capacity

The ERU source capacity for Zone 3 finished water with the Alt 5 development is 2,586 and -2,237 for ADD and MDD, respectively.

Table 9B: Source (Zone 3 Finished Water) Analysis – Alt 5

Total	Current Capacity[a]		Demand/ERU[b]		Current Available ERU Capacity[c]	Proposed ERUs[d]	Revised Available ERU Capacity[e]
ADD	1,400	gpm	0.18	gpm	5,554	2,968	2,586
MDD	1,400	gpm	0.492	gpm	553	2,789	-2,237

[a] Two 1,400 gpm finished water Zone 3 pumps, assume one pump out of service consistent with DOH standards
[b] Values from 2015 WSP Table 2-35
[c] Divide current capacity by demand/ERU and subtract current ERUs
[d] Values from Table 5B
[e] Subtract proposed ERUs from current available ERU capacity

Storage Analysis

Table 10A summarizes the current and proposed water demands calculated in Tables 1, 2, and 3.

Table 10A: Summarization of Water Demand – 47N

	ADD		MDD		PHD
	gpd	*mgd*	*gpd*	*mgd*	*gpm*
Current Demand	1,030,116	1.030	3,498,058	3.498	4,907
Proposed Demand	402,952	0.403	999,893	1.000	1,389
City Heights	178,717	0.179	471,057	0.471	654
47º North	224,235	0.224	528,836	0.529	734
Current & Proposed Demand	1,433,068	1.433	4,497,951	4.498	6,296

Table 10B summarizes the current and proposed water demands calculated in Tables 1, 2, and 4.

Table 10B: Summarization of Water Demand – Alt 5

	ADD		MDD		PHD
	gpd	*mgd*	*gpd*	*mgd*	*gpm*
Current Demand	1,030,116	1.030	3,498,058	3.498	4,907
Proposed Demand	629,426	0.629	1,971,920	1.972	2,739
City Heights	178,717	0.179	471,057	0.471	654
SEIS Alt. 5	450,710	0.451	1,500,863	1.501	2,085
Current & Proposed Demand	1,659,542	1.660	5,469,978	5.470	7,646

The storage analysis tables and calculations below are consistent with those presented in Chapter 3 of the 2015 WSP, and have been updated to reflect the current and proposed demands summarized above.

Total System Storage

Standby Storage: The current conditions have been updated to reflect the additional 2.0 mgd filter train, which increased the supply source total (net the largest source) to 4.5 mg. Calculations for Scenarios A and B are shown in Table 11A and 11B, respectively.

Table 11A: Total System Standby Storage – 47N

	Current		Current & Proposed	
System ADD	1.030	mgd	1.433	mgd
X 2 Days	2		2	
Storage Subtotal	2.060	mg	2.866	mg
Sum of all Sources minus Largest Source	4.5	mg	4.5	mg
Storage Subtotal minus Supply Subtotal	less than 0		less than 0	
Equivalent Residential Units (ERUs)	4,976		6,923	
x Min. 200 gal	200	gal	200	gal
Storage Minimum	0.995	mg	1.385	mg
Minimum Required Standby Storage	**0.995**	**mg**	**1.385**	**mg**

Table 11B: Total System Standby Storage – Alt 5

	Current		Current & Proposed	
System ADD	1.030	mgd	1.660	mgd
X 2 Days	2		2	
Storage Subtotal	2.060	mg	3.319	mg
Sum of all Sources minus Largest Source	4.5	mg	4.5	mg
Storage Subtotal minus Supply Subtotal	less than 0		less than 0	
Equivalent Residential Units (ERUs)	4,976		8,017	
x Min. 200 gal	200	gal	200	gal
Storage Minimum	0.995	mg	1.603	mg
Minimum Required Standby Storage	**0.995**	**mg**	**1.603**	**mg**

Fire Suppression Storage: The City of Cle Elum requirement of 480,000 gal, which exceeds DOH minimum requirements, will remain the minimum fire suppression storage for the water system for both scenarios.

Equalizing Storage: As with standby storage, the current conditions have been updated to reflect the additional 2.0 mgd filter train, which increased the supply source total to 4,500 gpm. Calculations for Scenarios A and B are shown in Table 12A and 12B, respectively.

Table 12A: Total System Equalizing Storage – 47N

	Current		Current & Proposed	
Peak Hour Demand	4,907	gpm	6296	gpm
- Maximum Source Capacity	4,500	gpm	4,500	gpm
Equalizing Storage Subtotal	407	gpm	1,796	gpm
x DOH Multiplier	150	gal/gpm	150	gal/gpm
Equalizing Storage Total	**0.061**	**mg**	**0.269**	**mg**

Table 12B: Total System Equalizing Storage – Alt 5

	Current		Current & Proposed	
Peak Hour Demand	4,907	gpm	7,646	gpm
- Maximum Source Capacity	4,500	gpm	4,500	gpm
Equalizing Storage Subtotal	407	gpm	3,146	gpm
x DOH Multiplier	150	gal/gpm	150	gal/gpm
Equalizing Storage Total	**0.061**	**mg**	**0.472**	**mg**

Operational Storage: Consistent with the 2015 WSP, the operational storage for the system is equal to 456,280 gallons in both scenarios.

Total Storage: The total storage requirements have been updated per the current conditions and all proposed developments for Scenarios A and B, which are summarized in Table 13A and 13B, respectively.

Table 13A: Total System Storage Requirements – 47N
(Storage values in mg)

	Current	Current & Proposed
Number of ERUs	4,976	6,923
Operational Storage	0.456	0.456
Equalizing Storage	0.061	0.269
Standby Storage	0.995	1.385
Fire Suppression Storage	0.480	0.480
Subtotal	1.992	2.590
10% Contingency for Losses	0.199	0.259
Total Storage Required	2.191	2.849
Existing Storage Capacity	2.574	2.574
Available System Storage	**0.383**	**-0.275**

Table 13B: Total System Storage Requirements – Alt 5
(Storage values in mg)

	Current	Current & Proposed
Number of ERUs	4,976	8,017
Operational Storage	0.456	0.456
Equalizing Storage	0.061	0.472
Standby Storage	0.995	1.603
Fire Suppression Storage	0.480	0.480
Subtotal	1.992	3.011
10% Contingency for Losses	0.199	0.301
Total Storage Required	2.191	3.312
Existing Storage Capacity	2.574	2.574
Available System Storage	**0.383**	**-0.738**

Zone 3 Storage

Standby Storage: As discussed in the Zone 3 Finished Water analysis, the pumping capacity for the Zone 3 standby storage calculation assumes one of two pumps out of service for a source capacity of 2.0 mg. Calculations for Scenarios A and B are shown in Table 14A and 14B, respectively.

Table 14A: Zone 3 Standby Storage – 47N

	Current		Current & Proposed	
Zone 3 ADD	0.460	mgd	0.848	mgd
X 2 Days	2		2	
Storage Subtotal	0.921	mg	1.697	mg
Sum of all Sources minus Largest Source	2.0	mg	2.0	mg
Storage Subtotal minus Supply Subtotal	less than 0		less than 0	
Equivalent Residential Units (ERUs)	2,224		4,098	
x Min. 200 gal	200	gal	200	gal
Storage Minimum	0.445	mg	0.820	mg
Minimum Required Standby Storage	**0.445**	**mg**	**0.820**	**mg**

Table 14B: Zone 3 Standby Storage – Alt 5

	Current		Current & Proposed	
Zone 3 ADD	0.460	mgd	0.641	mgd
X 2 Days	2		2	
Storage Subtotal	0.921	mg	1.282	mg
Sum of all Sources minus Largest Source	2.0	mg	2.0	mg
Storage Subtotal minus Supply Subtotal	less than 0		less than 0	
Equivalent Residential Units (ERUs)	2,224		5,192	
x Min. 200 gal	200	gal	200	gal
Storage Minimum	0.445	mg	1.038	mg
Minimum Required Standby Storage	**0.445**	**mg**	**1.038**	**mg**

Fire Suppression Storage: The City of Cle Elum requirement of 480,000 gal, which exceeds DOH requirements, will remain the minimum fire suppression storage for the Zone 3 reservoir for both scenarios.

Equalizing Storage: The maximum source capacity for Zone 3 is the two existing 1,400 gpm pumps. Calculations for Scenarios A and B are shown in Table 15A and 15B, respectively.

Table 15A: Zone 3 Equalizing Storage – 47N

	Current		Current & Proposed	
Peak Hour Demand	2,195	gpm	3,514	gpm
- Maximum Source Capacity	2,800	gpm	2,800	gpm
Equalizing Storage Subtotal	less than 0		714	gpm
x DOH Multiplier	150	gal/gpm	150	gal/gpm
Equalizing Storage Total	**0.000**	**mg**	**0.107**	**mg**

Table 15B: Zone 3 Equalizing Storage – Alt 5

	Current		Current & Proposed	
Peak Hour Demand	2,195	gpm	4,864	gpm
- Maximum Source Capacity	2,800	gpm	2,800	gpm
Equalizing Storage Subtotal	less than 0		2,064	gpm
x DOH Multiplier	150	gal/gpm	150	gal/gpm
Equalizing Storage Total	**0.000**	**mg**	**0.310**	**mg**

Operational Storage: Consistent with the 2015 WSP, the operational storage for Zone 3 is equal to 54,149 gallons in both scenarios.

Total Storage: The Zone 3 storage requirements have been updated per the current conditions and all proposed developments for Scenarios A and B, which are summarized in Table 16A and 16B, respectively.

Table 16A: Zone 3 Storage Requirements – 47N
(Storage values in mg)

	Current	Current & Proposed
Number of ERUs	2,224	4,098
Operational Storage	0.054	0.054
Equalizing Storage	0.000	0.107
Standby Storage	0.445	0.820
Fire Suppression Storage	0.480	0.480
Subtotal	0.979	1.461
10% Contingency for Losses	0.098	0.146
Total Storage Required	1.077	1.607
Existing Storage Capacity	1.400	1.400
Available Zone 3 Storage	**0.323**	**-0.207**

Table 16B: Zone 3 Storage Requirements – Alt 5
(Storage values in mg)

	Current	Current & Proposed
Number of ERUs	2,224	5,192
Operational Storage	0.054	0.054
Equalizing Storage	0.000	0.310
Standby Storage	0.445	1.038
Fire Suppression Storage	0.480	0.480
Subtotal	0.979	1.882
10% Contingency for Losses	0.098	0.188
Total Storage Required	1.077	2.070
Existing Storage Capacity	1.400	1.400
Available Zone 3 Storage	**0.323**	**-0.670**

Conclusion

The existing water system is not sufficient to meet projected water demand nor storage requirements of either Scenario A or B, as presented in Table 17 (next page). Three system components will need to be addressed to accommodate 85% of City Heights development full buildout and full buildout of either the 47º North or the original Bullfrog Flats (SEIS Alternative 5) developments:

- Source – New filter train (per MDD analysis)
- Source – New Zone 3 finished water pump (per MDD analysis)
- Storage – New Zone 3 reservoir storage (per ADD and MDD analysis)

Table 17 (next page) summarizes the results of each analysis for Scenarios A and B.

Projected water demands will be translated into actual consumption as the development phases are constructed. The 2001 Water Supply System Project Development Agreement between the City of Cle Elum and Trendwest established "trigger" points when improvements would become necessary, including production thresholds for specified durations, or when a specified number of new water connections were reached. Similar "trigger" points should be established for three system components identified in this analysis.

The proportionate share responsibility for the water system deficiencies under Scenarios A and B are calculated as the ratio of proposed ERUs for the two developments to the total number of proposed ERUs for each scenario within the analyzed buildout period. The results are shown in Table 18 below:

Table 18: Development Proportionate Share Responsibility

	Scenario A			*Scenario B*		
	CH	47N	Total	CH	Alt 5	*Total*
ADD ERUs	863	1,083	1,947	863	2,177	3,041
Proportionate Responsibility	**44%**	**56%**	**100%**	**28%**	**72%**	**100%**
MDD ERUs	684	768	1,451	684	2,178	2,862
Proportionate Responsibility	**47%**	**53%**	**100%**	**24%**	**76%**	**100%**

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

Table 17A: Summarization of Water System Source Analyses

System Component	Current Capacity	Demand/ERU	Current ERU Capacity	Scenario A – CH & 47N		Scenario B – CH & Alt 5	
				Proposed ERUs	Current and Proposed Available ERU Capacity	Proposed ERUs	Current and Proposed Available ERU Capacity
Water Rights							
Annual	783 mg	0.095 mg	3,266	1,223	2,043	2,317	949
Instantaneous	4,667 gpm	0.492 gpm	4,404	908	3,496	2,318	2,085
Source (Raw Water)							
Total ADD	4,200 gpm	0.18 gpm	18,357	1,947	16,411	3,041	15,317
Total MDD	4,200 gpm	0.492 gpm	3,455	1,451	2,003	2,862	593
Source (Finished Water)							
Total ADD	3,100 gpm	0.18 gpm	12,246	1,947	10,300	3,041	9,206
Total MDD	3,100 gpm	0.492 gpm	1,219	1,451	-232	2,862	-1,643
Source (Zone 3 Finished Water)							
Total ADD	1,400 gpm	0.18 gpm	5,554	1,874	3,680	2,968	2,586
Total MDD	1,400 gpm	0.492 gpm	553	1,379	-826	2,789	-2,237

Table 17B: Summarization of Water System Storage Analyses

Storage (all values in mg)	Existing Capacity	Current Storage Demand	Available Storage	Current and Proposed Storage Demand	Available Storage	Current and Proposed Storage Demand	Available Storage
Total System	2.574	2.191	0.383	2.849	-0.275	3.312	-0.738
Zone 3	1.400	1.077	0.323	1.607	-0.207	2.070	-0.670

Appendix D

UPDATED PLANTS, ANIMALS, & WILDLIFE MEMO

Raedeke Associates, Inc.

Wetland & Aquatic Sciences
Wildlife Ecology
Landscape Architecture

TECHNICAL MEMORANDUM

April 16, 2021

To:	Ms. Gretchen Brunner EA Engineering, Science, and Technology, Inc.
From:	Richard W. Lundquist, M.S., President /Wildlife Biologist Andrew J. Rossi, B.S., Wildlife Biologist Raedeke Associates, Inc.
RE:	47° N DSEIS – Supplemental Information to Draft SEIS Wetlands, Plants, & Animals (R.A.I. No. 2019-084-004)

Upon review of the Draft Supplemental Environmental Impact Statement (DSEIS) for the 47° North/Bullfrog Flats project, the Washington Department of Fish and Wildlife (WDFW) requested additional information regarding the potential impacts to wildlife species and habitats that were discussed in the DSEIS. Those comments from WDFW were received from EA Engineering, Science, and Technology, Inc. on November 9, 2020. The purpose of this technical memorandum is to provide additional information and disclose probable impacts to the specific species and habitats requested by WDFW.

1.0 Regulated Species Information in the Draft SEIS

The plants and animals report for the Draft SEIS (Appendix E; Raedeke Associates, Inc. 2020) provided information on all Washington Department of Fish and Wildlife (WDFW 2008, as updated) Priority Habitats and Species (PHS) listed species that are indicated as potentially occurring at the project site by the WDFW (2019) online PHS mapper. The report also discussed all federally listed species from the USFWS Information for Planning and Consultation (IPaC) list (USFWS 2019). Potential occurrence was indicated, as well as probable impacts for many of these species. These species include gray wolf, northern spotted owl, wolverine, grizzly bear, Canada lynx, elk, Columbia spotted frog, sharp-tailed snake, bald eagle, and pileated woodpecker (see DSEIS Appendix E).

Regarding the gray wolf, the report addressed the potential for wolves occurring within the project site, but it is worth noting that trail cameras posted at the adjacent Suncadia property have photo documentation of occasional occurrence of wolves on that property,

further confirming the assertion that wolves could occur within the 47° N / Bullfrog Flats project boundaries.

2.0 WASHINGTON STATE WILDLIFE ACTION PLAN (SWAP)

At the recommendation of WDFW (Jennifer Nelson, Scott Downes, WDFW, Pers. Comm. November 2020) cinnamon teal (*Anas cyanoptera*) and band-tailed pigeon (*Patagioenas fasciata*) should also be addressed with respect to the conservation concerns in the Washington State Wildlife Action Plan (WDFW 2015). The SWAP is a comprehensive plan for conserving the state's fish and wildlife and the natural habitats on which they depend, with particular focus on Species of Greatest Conservation Need (SGCN), as identified by the state (WDFW 2015).

The cinnamon teal (so named because of its cinnamon coloration) is a dabbling duck located in Washington during the breeding season and migrates to warmer southern wintering areas in late summer. Although not listed federally, nor in the State of Washington or on the PHS list, the cinnamon teal is of conservation concern due to its approximate 3.3 percent decline in population numbers each year from 1968 to 2012. Their primary habitat consists of dense upland vegetation (for nesting) located near freshwater ponds and lakes with emergent vegetation. They could occur on or near the site in the Cle Elum River and associated wetlands, such as Wetlands 1, 2 and 3 on the project site and in Bullfrog Pond immediately north on the Suncadia site. The smaller, isolated wetlands (Wetlands 4, 5, and 6), located in the central portion of the project site, which consist of scrub-shrub and forested communities, do not likely have sufficient ponding or inundation to support cinnamon teal.

The most relevant conservation stressor to the 47° N / Bullfrog Flats project in terms of cinnamon teal is the loss or degradation of wetlands due to hydrologic impacts from development. The higher-quality, more inundated wetlands (Wetlands 1, 2 and 3) along the river that could provide high quality habitat for cinnamon teal would be preserved within the river corridor with hydrologic conditions unaffected under SEIS Alternative 6, as well as the other alternatives evaluated in the Draft SEIS. Consequently, neither SEIS Alternative 5 or 6 are expected to impact cinnamon teal.

Band-tailed pigeons are a bird associated primarily with conifer or mixed hardwood and conifer forests west of the cascade crest. Band-tailed Pigeons prefer forest edges, open sites bordered by tall conifers, and they roost in thick conifers. Their habitat availability has been influenced by timber harvesting in recent years. In the early breeding season, mineral springs and tidal flats become important for supplementation to their diet. It is thought that the suppression of a broadleaf/shrub understory layer in managed forests is having a negative impact on band-tailed pigeon populations.

The band-tailed pigeon is not federally listed, nor listed in Washington state. It is listed in the PHS list as a Species of Recreational, Commercial, and/or Tribal Importance, although it is not listed in Kittitas County. This species is not mapped as occurring at the project site by the WDFW (2019) PHS mapper, and because it is mostly associated with closed canopy forests west of the cascade crest, it is not expected that band-tailed pigeons would occur regularly on the project site. This species was not detected on the site or vicinity in previous studies (Raedeke Associates, Inc. 1999). No mineral springs are known to occur on the site or vicinity. The development alternatives would reduce the amount of forest habitat available to this species, but because they are unlikely to occur on site, the project is not expected to adversely affect this species.

3.0 Species and Habitats of Greatest Conservation Need Lists

The project site appears to be located within the Northern Rocky Mountain Dry-Mesic Montane Mixed Conifer Forest Type of the Species of Greatest Conservation Need / Habitats of Greatest Conservation Need lists. The Species of Greatest Conservation Need (SGCN) list indicates 11 species closely associated with this habitat type. Chapter 4 of the SWAP (WDFW 2015) states "This widespread eastern Washington system includes a number of closely associated SGCN birds (pygmy nuthatch, white-headed woodpecker, Mountain Quail, Great Gray Owl, Golden Eagle, and Flammulated Owl), Mammals (Lynx, Western Gray Squirrel) and Reptiles (California Mountain Kingsnake, Sharp-tailed Snake). Old growth forest structure, snags and downed wood are key habitat features for species closely associated with this system."

The pygmy nuthatch (*Sitta pygmaea*) is a small, clinging songbird that is strongly associated with old ponderosa pine forests. The forests provide cavities for nesting, as well as a source of food throughout the year. Currently the pygmy nuthatch is considered a species of concern in the State of Washington because of its dependence on old Ponderosa pine forests (WDFW 2021b). At the 47° North / Bullfrog Flats project site, this species would most likely be associated with the forest communities dominated by Ponderosa pine, as shown in Figure 3 of the plants and animals report for the Draft SEIS (see DSEIS Appendix E). Given the history of timber management on the site, these areas do not necessarily have mature ponderosa pine forests but would likely contain the tree species composition sufficient to support individuals of this species. This species was not observed on site or in the vicinity during previous or recent investigations. The SEIS Alternatives would remove some potential habitat for this species on site. However, portions of the Ponderosa pine dominated forest habitat, particularly in the river corridor, the slopes west of the proposed RV park, and in habitat corridors in the eastern part of the site, would be retained under SEIS Alternatives 5 and 6.

The white-headed woodpecker (*Picoides albolarvatus*) is currently not listed federally, and it is currently a candidate species listed by Washington state, with breeding sites and regular occurrences considered Priority Areas in Washington (WDFW 2008). This

woodpecker is found on the eastern slopes of the Cascade Mountains and is associated with open canopy, mature and old-growth ponderosa pine forest (Larsen, Azerrad, and Nordstrom 2004). The Washington SWAP as well as the PHS management recommendations indicate that this species is sensitive to the loss of this type of mature ponderosa pine forest. Similar to the pygmy nuthatch, this species could be associated with the Ponderosa pine dominated forest stands on site. These areas do not necessarily have mature ponderosa pine forests but would likely contain the tree species composition sufficient to support individuals of this species. This species was not observed on site or in the vicinity during past or recent investigations, and habitat elements for this species are limited, without an abundance of large Ponderosa pine snags (no concentrations of such snags have been observed on site). As for pygmy nuthatches, both SEIS Alternative 5 and 6 would retain some areas of pine-dominated forest on site.

Mountain Quail (*Oreortyx pictus*) is not currently listed federally, nor by the state of Washington, but is included on the WDFW (2008) PHS list as a priority species of Recreational, Commercial, and/or Tribal Importance. This species is thought to have declined due to loss of dense shrub communities in riparian zones. Mountain Quail are found in dense cover with scattered open areas on slopes in foothills and mountains, and in summer they require a source of water (Seattle Audubon Society 2021b). Range maps from the WDFW (2008) PHS documents, and Cornell (2019) and Seattle Audubon Society (2021b) online resources do not indicate the range of mountain quail to include the project site, vicinity, or Kittitas County, but the species has been introduced in several areas, including the eastern Cascades. This species was not observed on site during previous or recent investigations, and the nearest documented sightings of mountain quail are 2 miles to the east of the property, in Section 26, Township 20 North, Range 15 East, and approximately 5 to 8 miles to the east-southeast of the property, in Section 24, 29, and 33, Township 20 North, Range 16 East. The majority of the potential riparian, densely shrubby habitat at the 47° North / Bullfrog Flats project site is planned to be retained within the Cle Elum River corridor under SEIS Alternatives 5 and 6, so the project is not expected to adversely impact this species.

Great Gray Owls (*Strix nebulosa*) are currently not listed federally but are considered a Species of Greatest Conservation Need by the state of Washington. They are not listed on the WDFW (2008) PHS list. This large owl, one of the least-studied owl species in the state, is a rare local breeder in parts of northern Washington, such as the Okanogan Highlands (and perhaps other locations), and a rare winter visitor elsewhere in the state (Seattle Audubon Society 2021a, WDFW 2021a) eastern Washington. These owls are primarily found between 2,500 feet and 7,500 feet elevation in conifer forests adjacent to montane meadows. Because the known range of this species is far from the site and the habitat characteristics of the site do not match those preferred by the great gray owl, this species is not expected to be present at the 47° North / Bullfrog Flats project site.

Golden Eagles (*Aquila chrysaetos*) are a large raptor that can be found throughout much of Washington state. They are primarily associated with open plateaued areas with many

cliffs, often adjacent to streams or rivers that have been deeply channelized into canyons. The species can, however, be found nesting in mature or old growth conifers near clearcuts. The general range (Larsen, Azerrad, and Nordstrom 2004) of the golden eagle extends through the project site, but none were observed on the site or vicinity during previous or recent studies (Raedeke Associates, Inc. 1999, 2020), and the WDFW (2019) PHS maps contain no records on the site or in the vicinity. No golden eagle nests are currently known to occur regularly on the 47° North / Bullfrog Flats project site. Occasional migrants are seen throughout the surrounding area during spring. Potentially suitable nesting cliffs exist approximately 7 miles north of the Suncadia property at the Dry Creek Cliffs. Because golden eagles are not expected to find particularly suitable habitat on site, neither SEIS Alternative 5 or 6 are expected to have significant adverse impacts on golden eagles.

A small raptor, the Flammulated Owl (*Otus flammeolus*) is associated primarily with mid-elevation coniferous forests (Larsen, Azerrad, and Nordstrom 2004). This species is listed as a Candidate Species in the State of Washington, with breeding sites and areas of regular occurrences considered Priority Areas (WDFW 2008). The flammulated owl is not currently listed federally. The WDFW (2019) PHS database contained no records of flammulated owl observations or breeding sites on the site or in the vicinity. Flammulated owls were not observed or detected at the 47° site during previous wildlife investigations of the site and vicinity by Raedeke Associates, Inc. (1999) or during field investigations since. Calling flammulated owls had been heard farther up the Cle Elum drainage at Morgan Creek and to the south in the Taneum Creek drainage (Raedeke Associates, Inc., staff observations; see Raedeke Associates, Inc. 1999). Flammulated owls could forage on the property within ponderosa pine and grand fir/Douglas-fir forests with relatively open canopies and understories. Flammulated owls could potentially find breeding habitat on site or in the vicinity in the limited areas of older forests of these types, which have denser understory vegetation and a more multiple-layered structure, but the suitability of these areas would be limited by available snags, and the 47° North site generally lacks older pine forests. Conversion of forested areas on the 47° N / Bullfrog Flats project site to urban uses with SEIS Alternatives 5 and 6 could reduce potential foraging in this location for some individuals of this species but is unlikely to impact any breeding pairs of flammulated owls at the project site.

Canada lynx (*Lynx canadensis*) were discussed in both the MountainStar EIS (Raedeke Associates, Inc. 1999), as well as the 47° North Draft SEIS (Raedeke Associates, Inc. 2020). As previously mentioned, because of the fragmented, forested habitat, elevation below 4,000 feet, and high human activity, Canada lynx are not expected to use the immediate vicinity of the 47° North / Bullfrog Flats project location. Observations during the October 2019 investigation found no indication there were changes to suitable habitat at the project location.

Western gray squirrels (*Sciurus griseus*) are not currently listed federally but are listed as threatened in the state of Washington. This species' range has greatly contracted in recent

years and is currently restricted to three distinct populations in north-central Washington (western Okanogan and northern Chelan Counties), south-central Washington (Klickitat and southern Yakima Counties), and at Joint Base Lewis-McChord in Pierce and Thurston Counties (Linders et al. 2010; WDFW 2015). This species is associated with transitional areas of conifer forest that meet their need for open patches of oaks and other deciduous trees. They also prefer areas that have patches of trees with dense canopy cover to provide visual screening from their nests, as well as escape cover and growing conditions for preferred food sources. Because of their well-documented and restricted range (Linders et al. 2010) it is not expected that western gray squirrels would occur at the 47° North / Bullfrog Flats project site.

The California mountain kingsnake (*Lampropeltis zonata*) is a Washington state candidate species (WDFW 2008), but it is not listed federally. Washington is the northern extreme edge of the range of the California mountain kingsnake and this species is only known to occur in Washington in the Columbia River Gorge area (Larsen 1997). Because of this, this species is not expected to occur at the project site.

The sharp-tailed snake (*Contia tenuis*) was discussed briefly in the 47° North Draft SEIS report (Raedeke Associates, Inc. 2020) as well as in the MountainStar EIS (Raedeke Associates, Inc. 1999). This species may utilize the riparian zones of the Cle Elum River corridor, as well as edges between forested communities and open meadow communities. Sharp-tailed snakes occur in damp conditions and at lower temperatures (50° to 63° F) than most other snake species. This species is listed as a candidate species in Washington state (WDFW 2008). Both the WDFW (2019) PHS map and Elizabeth Torrey at WDFW (personal communication 2020) confirmed occurrences of this species near the project site south of I-90, in the complex of wetlands and riparian areas along the Yakima River. It is possible that this species is utilizing this site, especially in the open space areas near the Cle Elum River and within the wetland areas found on-site. As discussed in the plants and animals report for the Draft SEIS (Raedeke Associates, Inc. 2020), the most suitable habitats (riparian and wetland areas) are planned to be preserved under SEIS Alternatives 5 and 6, and therefore significant impacts to any individuals on the project site will be avoided. However, development around the smaller, isolated wetlands could impact dispersal and connectivity to and from this habitat, which could adversely impact individuals, should they inhabit this area.

A habitat of greatest conservation need, the Columbia basin foothill riparian woodland & shrubland habitat type, is associated with the lower Cle Elum River corridor areas of the 47° North / Bullfrog Flats project site. This habitat is characterized by an association with black cottonwood (*Populus balsamifera*), as well as white alder (*Alnus rhombifolia*), quaking aspen (*Populus tremuloides*), water birch (*Betula occidentalis*), and ponderosa pine (*Pinus ponderosa*). The most imminent threats to this habitat type include: overharvesting, climate change, agriculture and aquaculture side effects, dams and diversions, invasive species, and roads and development (WDFW 2015). As discussed in the Draft SEIS plants and animals report (Raedeke Associates, Inc. 2020), SEIS

Alternative 5 and 6 would retain the Cle Elum River and associated riparian and wetland habitats in a designated natural open space area, thus avoiding project impacts to these habitats.

4.0 HABITAT CONNECTIVITY AND WILDLIFE DISPERSAL

The plants and animals report for the Draft EIS (Raedeke Associates, Inc. 2020) addressed the potential impacts resulting from overall habitat removal and fragmentation during development of the project site. One of these potential impacts includes fragmentation of habitat on-site. Although the habitat on-site will become more fragmented as a result of the project development, areas including the 160-acre river corridor in the southwestern portion of the project site would be retained and this area would remain contiguous with other offsite open space, including the Washington State Horse Park and adjacent lands, as well as extensive open space on the Suncadia site, separated only by Bullfrog Road. In addition, many natural open space areas are proposed between the various RV, residential, and recreational areas that are contiguous with off-site open space. These segments of retained open space areas will continue to provide connectivity from the other open space areas to the south in the Washington State Horse Park as well as the large tracts of remaining vegetated areas to the north and west of the project site.

The Washington Wildlife Habitat Connectivity Working Group's Statewide and Columbia Plateau Analysis (WHCWG 2010, 2012) identified at least portions of the of the site as Habitat Concentration Areas for beaver and western toad and connectivity corridors for mule deer. The preserved open space areas previously mentioned will still function to provide some connectivity for these species, particularly beaver and western toad, who will be primarily located along the Cle Elum River corridor. If western toads were to occur within the smaller, isolated wetlands on site, the proposed RV park under SEIS Alternative 6 or residential development under SEIS Alternative 5 could isolate these wetlands and have the potential to hinder dispersal across access roads to nearby terrestrial habitats. However, western toads typically breed in permanent waters such as ponds and river side channels (WDFW 2021c) and are unlikely to breed in these seasonal wetlands onsite. Potentially suitable habitat in Bullfrog Pond offsite to the north is likely diminished by the presence of bullfrogs, which prey on western toads.

4.1 Surrounding Land-Use Changes and Habitat Connectivity

In addition to the proposed development at the 47° N / Bullfrog Flats project site, adjacent and nearby areas that were once characterized by natural habitat have become more fragmented and developed in recent years. The Cle Elum and Roslyn area have undergone significant changes in terms of human population density and overall land-use changes along the highways, and on the Suncadia Resort property. These changes have led to an overall reduction in habitat quantity and quality. However, a significant portion of the Suncadia property remains as natural and managed open space, and the surrounding forest lands remain. The development of the 47° N / Bullfrog Flats project site will further

contribute to these land-use and habitat composition changes, although, as discussed in the plants and animals report for the Draft SEIS (Raedeke Associates, Inc. 2020), the river corridor and much of the highest quality habitat on-site would be retained in open space areas (see DSEIS Appendix E).

4.2 Habitat Connectivity as outlined by The Washington Wildlife Habitat Connectivity Working Group

A number of Habitat Concentration Areas (HCAs) and Least-Cost Pathways were identified in the state within both Statewide Analysis and the Columbia Plateau Ecoregion documents produced by The Washington Wildlife Habitat Connectivity Working Group (WHCWG). A habitat concentration area can be defined as "significant habitat areas that are expected or known to be important for focal species based on actual survey information or habitat association modeling" (WHCWG 2010). A least-cost pathway can be described as a "continuous swath of land expected to encompass the best route for species to travel between habitat blocks" (WHCWG 2012). These are both identified by the WHCWG as important to conserve to ensure species retain mobility and connectivity between patches of habitat to best ensure overall species population health and genetic diversity. HCAs for western toad and beaver are indicated on and in the vicinity of the 47° North / Bullfrog Flats project site (WHCWG 2010) and a least-cost pathway between two black-tailed/mule deer HCAs is also indicated at the project site (WHCWG 2012, Jennifer Nelson, WDFW, personal communication, January 2021).

Spatial data received from Jennifer Nelson at WDFW (Pers. Comm. Jan 2021) indicates the western toad habitat concentration area on the 47° North / Bullfrog Flats project site is located within the areas adjacent to the Clue Elum River corridor. There is also a western toad HCA located northwest of the project site, on the northwest side of Bullfrog Road and extending up into the Suncadia resort. The western toad HCAs will be preserved under SEIS Alternatives 5 and 6, providing connectivity to the HCA located to the northwest of the project site. Least-cost pathways are identified for the western toad by the WHCWG (2010), but they are located south of I-90 and continuing further to the south.

The HCAs for beaver identified on and near the project site are more widespread than the western toad HCAs and include the Cle Elum River corridor (extending north into Suncadia) and portions of the plateau spanning across the central portion of the project site. Under SEIS Alternative 6, the managed and river corridor open space areas would preserve the beaver HCA within the Cle Elum River Corridor, and this area represents the most likely primary habitat in the area for beavers. Many areas off-site, such as the Washington State Horse Park and the Suncadia Resort, contain beaver HCAs and will continue to provide some functional connectivity through the landscape.

A least-cost pathway for black-tailed/mule deer is identified on WDFW spatial data (Jennifer Nelson, WDFW, Pers. Comm., January 2021) as generally extending northeast from habitat in the mountains north of Cle Elum, across SR 903, southwesterly through the

central plateau portion of the project site, and across I-90 and extending farther to the southwest. Development of the 47° North / Bullfrog Flats project site may alter portions of this connectivity pathway, but open space areas through the powerline corridors and through the forested areas in and adjacent to the Washington State Horse Park, as well as the forests along the river corridor, would continue to provide avenues of movement through the area. That the existing least-cost pathway crosses I-90, as well as SR 903 and the school and transfer station to the northeast of the site, indicates that deer can currently utilize this pathway and are adapted to some level of disturbance.

The Washington SWAP spatial data indicates many patches of imperiled habitats in the southwestern portion of the 47° North / Bullfrog Flats project site. These habitats areas depicted as imperiled to critically imperiled are contained within the Cle Elum River Corridor area on the project site. All of these imperiled habitat areas found on site would be retained with a large buffer under SEIS Alternatives 5 and 6.

5.0 LIMITATIONS

We have prepared this document for the exclusive use of the City of Cle Elum, EA Engineering, Science, and Technology, Inc., and their consultants. No other person or agency may rely upon the information, analysis, or conclusions contained herein without permission from them.

The determination of ecological system classifications, functions, values, and boundaries is an inexact science, and different individuals and agencies may reach different conclusions. We cannot guarantee the outcome of such agency determinations. Therefore, the conclusions of this document should be reviewed by the appropriate regulatory agencies prior to any detailed site planning or construction activities.

We warrant that the work performed conforms to standards generally accepted in our field, and has been prepared substantially in accordance with then-current technical guidelines and criteria. The conclusions of this report represent the results of our analysis of the information provided by the project proponent and their consultants, together with information gathered in the course of the study. No other warranty, expressed or implied, is made.

Thank you for the opportunity to provide this information. If you have any questions or need additional information, please do not hesitate to contact me at (206) 525-8122 or via email at rwlundquist@raedeke.com.

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Appendix E

UPDATED FISCAL CONDITIONS MEMO

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DATE: April 16, 2021
TO: Gretchen Brunner, EA Engineering
FROM: Morgan Shook and Sadie DiNatale, ECONorthwest
SUBJECT: Updated 47° North SEIS Fiscal Analysis Memorandum

ECONorthwest is working with EA Engineering on a Supplemental Environmental Impact Statement (SEIS) for the 47° North Project in Cle Elum. ECONorthwest previously prepared the Fiscal and Economic portion of the DSEIS. This memorandum serves as an updated analysis for the Fiscal DSEIS to address agency and public comments on the DSEIS. The economic analysis in the DSEIS remains unchanged.

Updated Fiscal Analysis in the DSEIS

The purpose of the updated fiscal DSEIS is to incorporate new information provided by the City of Cle Elum (staffing costs), and the Cle Elum Police Department (staffing numbers based on the ICMA method).

The update is organized into two components:

- **Component 1:** Update Exhibit 23[1] of the "Discussion Draft: 47° North Fiscal and Economic SEIS" memorandum prepared by ECONorthwest. ECONorthwest updated this exhibit to reflect updated police officer staffing costs provided by the City of Cle Elum and to reflect a modified amortized payment for equipment, training, vehicles, and other operational needs for police and fire.
- **Component 2:** Conduct an additional analysis to inform the net fiscal impact of SEIS Alternative 5 and 6 for the City of Cle Elum using staffing numbers based on the Cle Elum Police Department's ICMA method.

Component 1

Table 1 below shows the results of an analysis estimating reoccurring, future revenues and costs for the City of Cle Elum for SEIS Alternative 5, 6, 6a (47° North), and 6b (the commercial parcel). It is an update of Exhibit 23 of the "Discussion Draft: 47° North Fiscal and Economic SEIS" memorandum prepared by ECONorthwest. In summary, Table 1 presents the revised summary of revenues and costs, to inform the net fiscal impact of all four SEIS Alternatives.

The revised summary in Table 1 reflects a modification of the original police officer salary/benefits assumption in the DSEIS ($86,000). The $86,000 represented a police officer mean wage across Washington State per the Bureau of Labor Statistics Services plus an allotment for benefits relative to wages (also from the Bureau of Labor Statistics). The updated police officer salary/benefits assumption is $97,016. The $97,016 reflects a per FTE salary based on the City's

[1] Exhibit 23. City of Cle Elum Cumulative Revenue and Cost Summary (2020$ in Thousands), SEIS Alternative 5, SEIS Alternative 6, SEIS Alternative 6a (47° North), and SEIS Alternative 6b (the commercial parcel)

Salary and Wage Plan for the 48+ months step (Ordinance No. 1595) and benefits determined using a benefits multiplier from the Bureau of Labor Statistics. All other assumptions from the FSEIS analysis are retained.

In addition, the revised summary in Table 1 reflects a modification of the cost for equipment, training, vehicles, and other operational needs for police and fire. The original assumption was a lump sum $25,000 per FTE cost. This was adjusted to a $15,000 per FTE *per year* assumption to reflect an annual amortized payment for equipment, training, vehicles, and other operational needs. This assumption is derived from previous research by the authors (unpublished) and grounded in comparable contract police service costs charged to contract cities. For example, the 2020 cost of equipment, vehicle, training, cell phone, radio, and other purchased services for the King County Sheriff's Office contracts with cities is approximately $25,000 per deputy per year or about 15% of compensation (wages and benefits). The 15% estimate is used to derive a reasonable estimate of similar costs in the Cle Elum staffing equating to $15,000 per FTE per year.

The previous analysis showed that SEIS Alternatives 5, 6, 6a (47° North), and 6b (the commercial parcel) generate fiscal surpluses at build out. When looking at the residential/RV resort component (47° North) separately from the commercial component of SEIS Alternative 6, the analysis finds that SEIS Alternative 6b (the commercial parcel) may generate fiscal shortfalls in earlier years.

The updated analysis shows that SEIS Alternatives 5, 6, 6a, and 6b (the commercial parcel) generate fiscal surpluses at build out. When looking at the residential/RV resort component (47° North) separately from the commercial component of SEIS Alternative 6, the analysis finds that SEIS Alternative 6a shows a fiscal shortfall post-buildout and SEIS Alternative 6b shows a small fiscal shortfall in earlier years. The fiscal shortfall in the SEIS Alternative 6a in the 2037 time period is a timing issue and the result of three factors: 1) the one-time nature of the sales tax coming off construction has ended with the project reaching buildout and 2) the escalation (e.g., inflation adjusted growth) of on-going public service costs begins to outpace on-going tax revenues, and 3) the allocation of police FTE costs in 6a versus 6b relative to tax revenues. The situation in SEIS Alternative 6b mostly reflects the timing of additional public safety costs before much of the buildout is achieved.

TABLE 1
CITY OF CLE ELUM CUMULATIVE REVENUE AND COST SUMMARY (2020$ IN THOUSANDS), SEIS ALTERNATIVE 5, SEIS ALTERNATIVE 6, SEIS ALTERNATIVE 6A (47° NORTH), AND SEIS ALTERNATIVE 6B (THE COMMERCIAL PARCEL)

	2025	2031	2037	2051
SEIS Alternative 5				
Total Revenues	**$3,950**	**$8,890**	**$14,700**	**$28,200**
Property Taxes	$1,580	$4,930	$8,980	$18,920
Sales Tax on Construction	$1,870	$2,570	$3,290	$4,330
Ongoing Sales Tax	$80	$260	$480	$1,040
Utility Taxes	$420	$1,130	$1,950	$3,910
Total Costs	**$2,184**	**$6,030**	**$10,312**	**$21,595**
Police	$1,565	$4,452	$7,719	$16,525
Fire	$261	$778	$1,357	$2,845
Parks	$26	$79	$138	$289
Public Works	$332	$721	$1,098	$1,936
Net Fiscal Impact	**$1,766**	**$2,860**	**$4,388**	**$6,605**
SEIS Alternative 6				
Total Revenues	**$2,976**	**$7,306**	**$11,576**	**–**
Property Taxes	$960	$2,930	$4,900	--
Sales Tax on Construction	$1,176	$1,416	$1,486	--
Ongoing Sales Tax	$200	$1,210	$2,370	--
Utility Taxes	$640	$1,750	$2,820	--
Total Costs	**$2,237**	**$6,333**	**$10,670**	**–**
Police	$1,757	$5,076	$8,624	--
Fire	$163	$550	$958	--
Parks	$15	$52	$91	--
Public Works	$302	$655	$997	--
Net Fiscal Impact	**$739**	**$973**	**$906**	**–**
SEIS Alternative 6a (47°North)				

	2025	2031	2037	2051
Total Revenues	**$2,686**	**$5,756**	**$8,506**	**–**
Property Taxes	$920	$2,690	$4,310	--
Sales Tax on Construction	$1,096	$1,226	$1,226	--
Ongoing Sales Tax	$40	$130	$220	--
Utility Taxes	$630	$1,710	$2,750	--
Total Costs	**$1,942**	**$5,480**	**$9,225**	**–**
Police	$1,502	$4,338	$7,371	--
Fire	$139	$470	$818	--
Parks	$15	$52	$91	--
Public Works	$286	$620	$945	--
Net Fiscal Impact	**$744**	**$276**	**($719)**	**–**
SEIS Alternative 6b (the commercial parcel)				
Total Revenues	**$290**	**$1,540**	**$3,070**	**–**
Property Taxes	$40	$240	$580	--
Sales Tax on Construction	$80	$190	$270	--
Ongoing Sales Tax	$160	$1,080	$2,150	--
Utility Taxes	$10	$30	$70	--
Total Costs	**$295**	**$852**	**$1,444**	**–**
Police	$255	$738	$1,253	--
Fire	$24	$80	$139	--
Parks	$0	$0	$0	--
Public Works	$16	$34	$52	--
Net Fiscal Impact	**($5)**	**$688**	**$1,626**	**–**

Component 2

ECONorthwest conducted new analysis to address comments from the City of Cle Elum Police Department. The analysis compares the police staffing costs using the full-time equivalents (FTE) officer estimates based on the officer/population method (in the DSEIS) with the FTE based on the ICMA model. The FTE assumptions for the SEIS Alternatives are described below. As shown, the Police Department's staffing model would result in approximately double the FTE staff than the officer/population method used in the DSEIS under both SEIS Alternative 5 and 6 at buildout (assumed to be 2051 for SEIS Alternative 5 and 2028 for residential an RV components, and 2037 for the possible commercial component of SEIS Alternative 6). This information is based on calculations provided by the Police Department and were not replicated or proofed by the consultant.

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

Note that the updated staffing information provided by the Police Department and used in this fiscal analysis is based on the ICMA method, which is not the City's adopted police LOS standard (the City has no adopted standard), nor the typical method used in SEPA review. In addition, it is not clear what incremental growth assumption is used to derive the staffing estimates and whether those assumptions are consistent with the growth assumed in the SEIS alternatives. The common approach in SEPA documentation is the officer per population method used in the DSEIS to estimate police staffing. This analysis does not supplant the DSEIS fiscal analysis, rather it is provided for comparison.

Table 2 presents the results of an analysis to study the cost differences of SEIS Alternative 5 and 6 based on the FTE demand estimates bulleted above. This analysis also incorporates the updated police officer salary, benefits, and amortized payment cost information (as described above in Component 1 of the update).

Table 2 shows that the additional FTE using the Police Department ICMA method would result in greater costs to the City in each analysis year (2025, 2031, 2037, and 2051). The ICMA method results in greater cost to the City as police FTE demand is greater (5.3 FTE greater in SEIS Alternative 5 and 1.3 FTE greater in SEIS Alternative 6).

Table 2
CITY OF CLE ELUM CUMULATIVE POLICE COST COMPARISON (2020$ IN THOUSANDS) – SEIS ALTERNATIVE 5 AND SEIS ALTERNATIVE 6

	2025	2031	2037	2051
SEIS Alternative 5				
Alternative Cost Comparison				
Police Costs *Using FTE assumptions from DSEIS Analysis*	$1,565	$4,452	$7,719	$16,525
Police Costs *Using FTE assumptions from Police Dept's Staffing Model*	$2,274	$4,931	$10,092	$24,794
SEIS Alternative 6				
Alternative Cost Comparison				
Police Costs *Using FTE assumptions from DSEIS Analysis*	$1,757	$5,076	$8,624	--
Police Costs *Using FTE assumptions from Police Dept's Staffing Model*	$2,274	$5,808	$10,969	--