

City of Cle Elum
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June 16, 2026

Bullfrog Flats, LLC
Attn: Michelle Branley
18300 Redmond Way, Suite 120
Redmond, WA 98052

Sent via electronic mail to:
admin@bluefern.com

RE: Bullfrog Flats Development, P4, SUB-2026-001 – Notice of Incomplete Application

Dear Michelle Branley,

While the submitted preliminary plat and preliminary civil plans contain substantial engineering detail regarding lot layout, utilities, grading, drainage, landscaping, roadway layout, and proposed phasing, the application does not yet appear to fully satisfy all preliminary plat application requirements and support materials contemplated under CEMC 16.12A.030.

In particular, additional information and clarification are necessary regarding phased emergency access compliance under IFC Appendix D, and critical areas constraints.

I. Phasing

The proposed phasing strategy raises significant concerns regarding whether each phase independently satisfies required fire access and circulation standards. While P-4 appears to provide one connection to the existing/internal spine road system and a second connection toward future Phase P-3, the plans do not clearly demonstrate that two independent and code-compliant fire apparatus access routes will exist concurrent with the requirements of P-4.

The proposed southwest connection appears dependent upon future phase construction, and it is unclear whether that route will provide an independently functional secondary emergency access at the time of development. Additionally, demonstrated compliance with IFC Appendix D104 remoteness requirements, which requires separation between access points equal to at least one-half of the maximum overall diagonal dimension of the area served, will need to be provided.

Please provide information on:

- When each access route will be constructed and available; and
- Whether each route independently connects to the external street network; and
- Compliance with Appendix D access separation/remoteness standards; and
- Adequacy of interim emergency access conditions during phased buildout.

II. Preliminary plat deficiencies

- Steep Slopes / Development Agreement Condition 55. The preliminary civil plan identifies numerous lots adjacent to mapped steep slope areas and associated 25-foot steep slope setbacks, including but not limited to Lots 87-100, 102-126, 127-136, and lots adjacent to Tracts 4-9, 4-10, and 4-11. While the civil plans identify the location of the steep slope setback lines, the application does not clearly demonstrate that these lots contain sufficient developable area to accommodate future residential construction, associated grading, utilities, drainage facilities, and access improvements while remaining consistent with Development Agreement Condition 55 and applicable critical area protections.

Please provide additional information demonstrating compliance with Condition 55 and the feasibility of future development on the affected lots. Information may include conceptual building envelopes, grading exhibits, typical lot sections, geotechnical analysis, or other supporting documentation sufficient to demonstrate that residential development can occur without encroachment into protected steep slope areas, removal of vegetation inconsistent with Condition 55, or the need for future modifications to identified setback areas.

The overflow from the private inflation system appears to cross public right of way and outlets on to a steep slope, please review consistent with steep slope requirements.

- Private storm system franchise agreement will be required for the proposed private stormwater system;
- Lot 75 width should be verified, appears to be a typo;
- Curve C49 length should be verified, appears to be a typo;
- The preliminary plat should clearly identify the location, widths, and all easements (private stormwater) consistent with CEMC 16.12A.030(H);
- Please include proposed contours with intervals of five feet or less as part of the preliminary plat;
- Tract ownership and maintenance responsibilities are not clearly identified, including ownership and maintenance obligations for common tracts, storm facilities, open space areas, trails, and associated infrastructure;
- TR 4-4 appears to lack a labeling or directional arrow that should be corrected;
- Please include or identify "Pocket Parks" if they are proposed for this development; and
- Engineering has made comments in the civil plan set, see attached.

III. Narrative-related concerns include

- A. The project narrative references four parking stalls in a manner consistent with previous submittals. However, as constructed in prior phases, the developer is proposing only two parking stalls, which is consistent with the minimum parking requirement established in the Development Agreement. To avoid confusion, the narrative should be revised to accurately reflect the proposed improvements and clarify that the project is meeting or exceeding applicable parking requirements.
- B. The narrative states that the "typical" lot width is 50 feet; however, approximately 72 lots appear to have widths of less than 50 feet, with some lots as narrow as approximately 20 feet. It might be better to identify that lot widths range from 20' to XX'.

IV. Reports

A. Geotech

The submitted Geotech Report appears to only cover the first three phases, J, S-1, and S2. Please provide an updated report that encompasses this phase of development.

B. Wetlands

The current wetlands submittal is incomplete and does not provide sufficient information to adequately evaluate compliance with CEMC 18.01.070. Additional supporting analysis, exhibits, and technical documentation are required prior to staff completing its review of wetland and buffer impacts associated with the preliminary plat proposal.

- Updated project-specific wetland delineation and critical areas report;
- Wetland buffer averaging analysis demonstrating compliance with all code criteria;
- Functional assessment supporting averaging;
- Alternatives analysis and mitigation sequencing narrative;
- Detailed mitigation and monitoring plan;
- Critical areas protection tract/easement exhibits;
- Cross-sections through all buffer averaging areas;
- Fish and wildlife habitat impact analysis, if applicable

C. SEPA Checklist

Submit a completed Environmental (SEPA) Checklist. Pursuant to WAC 197-11-315, a threshold determination is required for the proposed Preliminary Plat application. The SEPA Responsible Official has determined that additional environmental information is necessary to evaluate potential impacts associated with the proposal, including site-specific considerations such as critical areas and cultural resources.

These citations may not address all potential issues associated with your applications but are intended to provide a more comprehensive summary of current concerns. Please ensure that all requested information is provided promptly to facilitate the review process. Failure to submit the required documentation may result in delays in processing your application.

If you have any questions or require clarification regarding the requested information, please do not hesitate to contact Colleda Monick, colleda.monick@cleelum.gov, or 509-966-7000.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Colleda Monick', with a stylized flourish at the end.

Colleda Monick
Planning Consultant
City of Cle Elum