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April 16, 2025

**Implementing Approval:** SEPA
**Process:** Request for Additional Information
**Applicant:** Wildwood Ranch LLC
**Parcel(s):** 623134 and 063034

**City Determination:** Insufficient Information

On March 25, 2025, the City received a response from the applicant, Wildwood Ranch LLC, addressing the City's request for additional information related to the SEPA review. On April 10, 2025, the City received an updated Critical Areas Report.

Per the WAC 197-11-335, the SEPA lead agency shall make its threshold determination based upon information reasonably sufficient to evaluate the environmental impact of the proposal (WAC 197-11-055(2) and 197-11-060(3)) and can require additional actions if, after reviewing the checklist, the agency concludes that there is insufficient information to make its threshold determination.

Per CEMC 14.40.030(B)(2), the SEPA responsible official may require the applicant or project sponsor to prepare and submit such technical studies, reports, or other environmental documents as may be necessary to complete required environmental reviews.

The City issued a Notice of Application on November 21, 2024, which resulted in twenty-one (21) comments from the general public, and six (6) agency comments necessitating further studies prior to establishing a SEPA threshold determination.

The threshold determination process is used to evaluate the environmental consequences of a proposal and determine whether it is likely to have any "significant adverse environmental impact." This determination is conducted by the lead agency and documented in either a Determination of Nonsignificance (DNS), a Mitigated Determination of Nonsignificance (MDNS), or a Determination of Significance (DS) and the subsequent preparation of an EIS.

Based on comments received from agencies and the public, on January 17, 2025, the City requested additional information deemed necessary to sufficiently evaluate the potential environmental impacts and issue a SEPA threshold determination for the project. Below is a summary of the request, the applicant's response (3/25/25), and staff's response.

1. **A Cultural Resource Survey**. The City received comments from the Colville and Snoqualmie Tribes as well as a request from the Department of Archeology and Historic Preservation that a professional archeological survey be conducted on the site.

   **Applicant's Response**: We request that the cultural resource survey be conditioned prior to final engineering or plat approval. Preliminary plat approval does not authorize any ground disturbance by the applicant. The study will be conducted prior to final civil engineering work or final plat approval and provided to the City of Cle Elum.

   **Staff's Response**: Permitted ground disturbance can occur after preliminary plat approval. The work conducted by a consultant to complete a cultural resource survey is not generally considered ground disturbance. That said, we can include a mitigation measure in the MDNS requiring that the cultural resource survey be conducted prior to any ground disturbance associated with engineering work or plat development.

2. An updated and revised **Critical Areas Report and preparation of a habitat management plan** meeting the requirements of the CEMC Chapter 18.01 and the Department of Fish and Wildlife letter dated December 11, 2024. Pending the outcome of these materials, please identify required buffers on a revised site plan.

   **Applicant's Response:** Applicant has consulted with WSDFW in regards to adequate buffers and setbacks from the noted critical areas. Please see attached correspondence and updated preliminary plat and conceptual civil plans.

   **Staff's Response:** An updated Critical Areas Report and plan revisions were submitted on April 10, 2025.

3. Respond to concerns regarding **Open Space Dedication and On-Site Parks**. Five (5) public comments were submitted requesting clarification about the lack of proposed open space and/or on-site parks. According to CEMC 17.140.030(A)(4), Development Agreements must address parks and open space preservation and/or dedication. The applicant is required to provide information on how the proposal addresses these subjects.

   **Applicant's Response:** Please see proposed development agreement, Section 8.2(d) Setbacks. All lots will have a minimum 20-ft driveway and garages in order to accommodate necessary parking requirements. Snow plowing will be provided by City of Cle Elum and done in a similar manner as the rest of the City's residential areas. We would also anticipate snow being stored in the designated stormwater areas when snow removal is necessary.

   **Staff's Response**: While the City acknowledges that stormwater facilities may be incorporated into open space areas in accordance with CEMC 16.12A.060(9), the primary concern raised in public comments—and reflected in the requirements of CEMC 17.140.030(A)(4) and 16.12A.050(F)—relates more directly to the provision or dedication of parks and recreational amenities, which are not satisfied by stormwater facilities.

Stormwater areas, while potentially multi-functional, do not serve the recreational needs of future residents and are not considered a substitute for dedicated park or recreation space. Although CEMC does not mandate on-site park development within every project, addressing how the proposal supports or connects to existing or planned parks and recreation facilities—or proposing an alternative form of open space or recreation area—would help to satisfy both public concerns and the intent of the code. Further, the smaller lot sizes proposed in this project may result in a higher demand for parks and recreational facilities.

To strengthen the application and align with the purpose of Development Agreements under CEMC 17.140 and preliminary plat approval under 16.12A.050, the City recommends the applicant provide additional information identifying how parks and recreational needs will be addressed, whether through on-site amenities, access to nearby public facilities, trail connections, or other recreational opportunities.

4. Respond to concerns regarding **Parking and Snow Removal/Storage**. Several public comments were submitted expressing concerns regarding potential lack of space for overflow parking and snow removal/storage.

   **Applicant's Response**: Please see proposed development agreement, Section 8.2(d) Setbacks. All lots will have a minimum 20-ft driveway and garages in order to accommodate necessary parking requirements. Snow plowing will be provided by City of Cle Elum and done in a similar manner as the rest of the City's residential areas. We would also anticipate snow being stored in the designated stormwater areas when snow removal is necessary.

   **Staff's Response:** To ensure availability of adequate snow storage in the designated stormwater tracts, the City will request appropriate terms to be included on the plat. Additionally, seasonal parking restrictions are appropriate, per CEMC 10.12.070. These terms may be documented on the plat and/or the associated Development Agreement.

In addition to the revised submittals received on March 25, 2025, updated plat maps were also provided. Upon review of the Development Agreement, the proposed design standards exhibit, and the updated plats, several inconsistencies and omissions were identified that must be addressed before a SEPA Threshold Determination can be issued.

For instance, Section 8.3 of the Development Agreement states that the minimum lot size shall be 2,500 square feet. However, this standard is not reflected in the proposed design standards exhibit, and no lot on the preliminary plat appears to meet this minimum. The smallest lot identified on the plat is 2,871 square feet.

Another example is the lack of a clear identification of all deviations from the applicable standards. For instance, within the area zoned Residential, proposed lot sizes range from approximately 3,073 square feet to 8,083 square feet. It is unclear whether any of these lots are intended for common wall development. In the Residential zone, common wall dwellings require a minimum lot size of 5,000 square feet per unit (10,000 square feet total) and a minimum lot width of 40 feet. However, the submitted plans indicate lot widths ranging from 15.84 feet to 35.95 feet. As noted in previous

correspondence and discussion, providing a table that clearly outlines all of the proposed standards versus the CEMC requirements would greatly improve the clarity of the proposal.

If it would be helpful to schedule an in-person meeting to discuss these inconsistencies as well as best practices for providing the information, we would be happy to set something up with you.

Please ensure that all requested information is provided by May 30, 2025, to continue the review process. Failure to submit the required information may result in your application lapsing, per CEMC 14.30.100(2)(c). **You may request additional time if necessary.**

If you have any questions, please do not hesitate to contact me at colleda.monick@cleelum.gov or (509) 966-7000.



Colleda Monick, Planning Consultant for
City of Cle Elum