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7:26 am, November 9, 2026

BEFORE THE HEARING EXAMINER
FORE THE CITY OF CLE ELUM

In the Matter of the Consolidated Hearing for the WILDWOOD RANCH DEVELOPMENT and Appeal of the Mitigated Determination of Nonsignificance (MDNS) issued for such proposal, **WILDWOOD RANCH, LLC,** Applicant/Respondent, **CITY OF CLE ELUM, SEPA Responsible Official,** Respondent, **FRIENDS OF DEER MEADOW, LLC** Appellant.	File Nos.: SUB-2023-003, DA-2024-001, SEPA-2024-004 APPELLANT'S DISCLOSURE OF EXPERT MATERIALS

COMES NOW Appellant Friends of Deer Meadow, LLC, and pursuant to paragraph 3 of the Hearing Examiner's Prehearing Scheduling Order, submits the following Expert Reports and Materials:

Exhibit 1 – Cecil & Associates – Civil Drainage Analysis

Exhibit 2 – Cecil & Associates – CV of John Farleigh

Exhibit 3 – DN Traffic Consultants, Inc. – November 6, 2026 Evaluation of Variances

Exhibit 4 – DN Traffic Consultants, Inc. – November 6, 2026 Traffic Impact Analysis

Exhibit 5 – DN Traffic Consultants, Inc. – Resume of Gary Norris

Exhibit 6 – DN Traffic Consultants, Inc. – Appeal Presentation

PETERSON RUSSELL KELLY LIVENGOOD PLLC
10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700 | F: 425.471.0714

DATED: November 6, 2026

PETERSON RUSSELL KELLY LIVENGOOD PLLC

By: _____
Terrence I. Danysh, WSBA No. 14313
10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700
F: 425.451.0714
E: tdanysh@prklaw.com
Attorney for Friends of Deer Meadow, LLC

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Exhibit 1

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PETERSON RUSSELL KELLY LIVENGOOD PLLC
10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700 | F: 425.471.0714

CECIL +ASSOCIATES

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November 2, 2026

Mr. Hearing Examiner
119 W First Street
Cle Elum, WA 98922

RE: Friends of Deer Meadow SEPA Appeal

Dear Mr. Hearing Examiner:

Cecil & Associates (C&A) was hired by Friends of Deer Meadow, LLC to review the August 14, 2025, SEPA decision (MDNS), filed under SEP#2024-004, associated with the Wildwood Development; and, to provide limited hypothetical stormwater mitigation analysis for the Site Plan as shown in the SEPA Checklist documents. This letter discusses the results of our research and presents a case where the stormwater mitigation measures, in particular, do not clearly meet the code, Cle Elum Municipal Code section 15.08.010, 16.12A.060, and the 2024 Cle Elum Construction Standards for the Private Construction of Public Facilities.

We recognize the SEPA decision is a single milestone in the overall procedural process for permitting this project or any comparable development. Other checks-and-balances exist so that when the project is fully permitted and groundbreaking can occur, in theory, all applicable codes have been met. The City has also zoned this area for residential growth to meet the long-term housing needs as shown in the Comprehensive Plan.

Therefore, we are viewing this project through a lens as unbiased as possible. The project documents we have reviewed are limited to the documents included with the SEPA Checklist and City materials (codes and publications) available online; nothing more. We presume that when the final permit is issued for construction the codes will be addressed, but the SEPA decision as an isolated document should not presume that the project will 'find a way' when there is not a clear path at the time of the decision. Doing so risks misunderstanding within the SEPA Decision.

Preliminary stormwater design would typically contain enough information to identify the minimum requirements of construction, in this case Core Elements in the SWMMEW, a basis of design for stormwater BMPs required to meet those Core Elements, and a Stormwater Site Plan showing diagrammatically the location of those BMPs meeting project specific setback requirements and maintenance access.

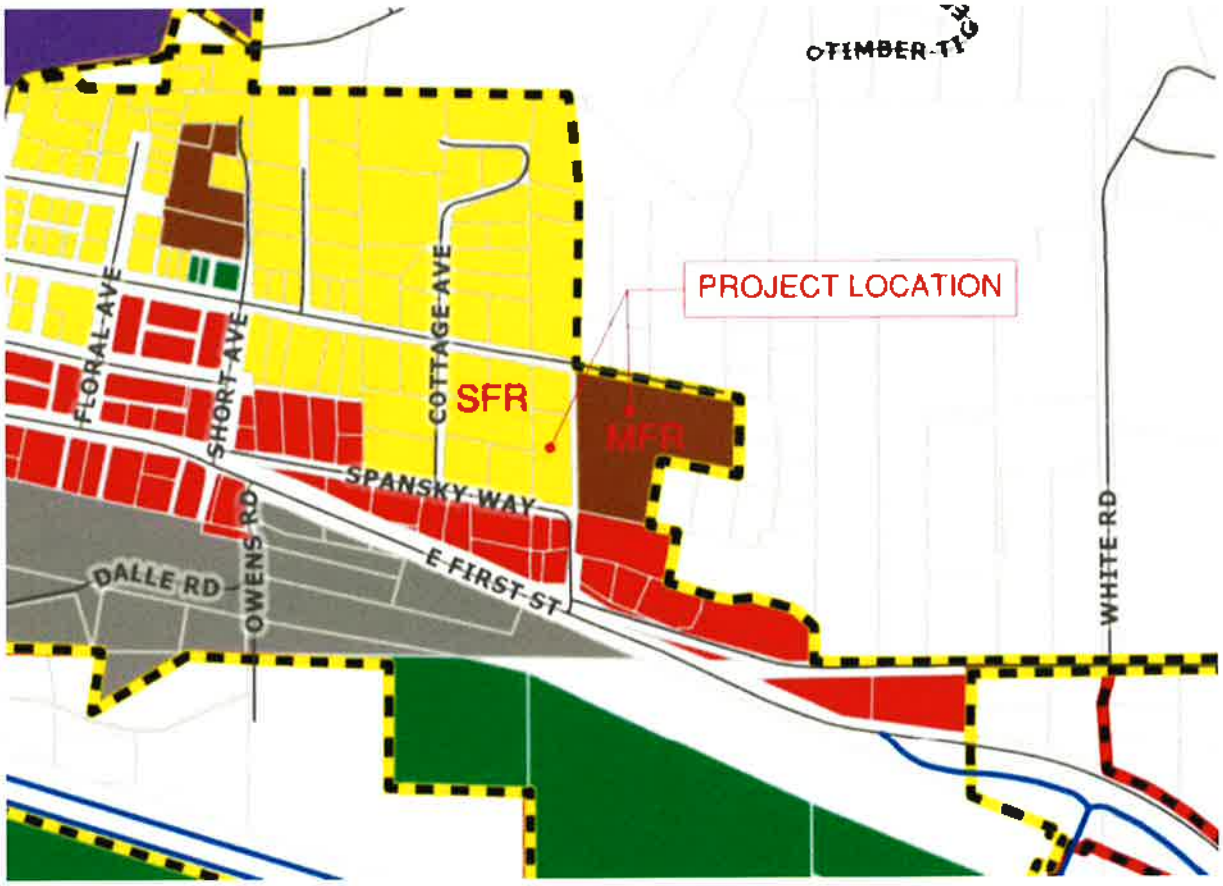
The design documents provided for the SEPA decision provide an inconclusive stormwater analysis. As a basis for design, a two-page stormwater memo was provided that provides a brief description of stormwater intent. The project does not contain a Grading Plan or Stormwater Site Plan (Drainage Plan) showing the minimum Core

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Elements of the SWMMEW have been addressed. The following sections of this letter contain a project summary and identify design omissions that were not included with the SEPA Checklist.

The Project

The Wildwood Development (the project) has obtained a SEPA decision of MDNS through the City of Cle Elum by proposing a 92-unit subdivision on approximately 11.97 acres of existing pastureland. The project is located on two parcels consisting of parcel number 623134 and parcel number 063034. The project bisects a City zoning line with single-family residential situated to the west of the zoning line and multiple-family residential to the east of the zoning line. The clip below was taken from the official City Cle Elum Zoning Map effective December 7, 2021.



CEMC 17.16.090 establishes the minimum lot width of 40-feet and minimum depth of 75-feet for Residential areas; and, CEMC 17.16.070 requires 5,000 square feet per single-family unit. CEMC 17.20.060 establishes a 5,000 square feet minimum lot size for Multiple-Family Residential areas with no stated maximum density.

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The project proposes to use a Development Agreement to modify minimum lot sizes and building setbacks to provide a similar number of residential units as intended by code. The Development Agreement has not been finalized as of writing this letter.

Stormwater: Minimum Elements of the SWMMEW

CEMC 15.08.010 establishes the 2024 Cle Elum Construction Standards for the Private Construction of Public Facilities and the latest edition of the Stormwater Management Manual for Eastern Washington (SWMMEW) for the basic design requirements pertaining to stormwater.

Based on the project description above the project would be required to address Core Elements (CE's) 1-8 and, at the discretion of the City, Additional Protective Measures (APM's) 1-3. The following is a brief description of how each element might be relevant to this SEPA decision.

Please note, the documents with the SEPA Checklist did not include a drainage report, calculations, or drainage plan to provide any substantive conclusions that the proposed road and lot design will adequately meet the stormwater design requirements.

Some of these requirements such as Operation & Maintenance and Financial Liabilities can be deferred to other/later permit reviews; however, a preliminary drainage report should be included to show that the project meets the basic stormwater requirements, particularly, CE4: Preservation of Natural Drainage Systems and Outfalls, CE5: Runoff Treatment, CE6: Flow Control, and APM2: Off-Site Analysis Report.

The following is a description of the applicability of these more critical stormwater mitigation elements.

CE4: Preservation of Natural Drainage Systems and Outfalls

This requirement is characterized by maintaining existing drainage patterns to the extent practical. Relevant code requirements from the SWMMEW state:

Projects shall preserve and maintain natural drainage patterns to the maximum extent practicable at the site. Discharges from the Project Site shall occur at the natural location, to the maximum extent practicable.

The manner by which runoff is discharged from the Project Site must not cause a significant adverse impact to downstream receiving waters and down-gradient properties, and should be addressed as part of the off-site analysis described in the SWMMEW.

All concentrated discharge locations (i.e. discharges from pipe systems, culverts, and ditches) must address energy dissipation. A project proponent who believes that energy

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dissipation should not be required must provide justification in the project's stormwater site plan.

To the maximum extent practicable, discharge stormwater in the same manner, at the same location, and at the same flow rate and volume as under the conditions that existed prior to development. Because some change in natural flow patterns is unavoidable after development, the preferred options for discharge of excess stormwater, listed in order of preference to maintain natural drainage systems, are the following:

Maintain dispersed sheet flow to match natural conditions.

1. *Infiltrate on-site.*
2. *Infiltrate off-site.*
3. *Discharge to existing ditch networks, canals, or other dispersal methods that allow for potential groundwater recharge.*
4. *Discharge to wetlands, if allowed.*
5. *Discharge to existing private or municipally owned stormwater systems, if allowed.*
6. *Evaporate on-site or off-site.*
7. *Create a new outfall for discharge to receiving waters.*

Stormwater control or treatment structures should not be located within the expected 25-year water level elevations for salmonid-bearing waters.

After reading the requirements above we can compare the project proposal by interpreting the Sewer Plan and the Water Plan because, again, no Stormwater Mitigation Plan was provided.

The project appears to propose a stormwater detention/retention pond with a piped overflow discharging to a man-made pond now identified as a fish-bearing critical area with 50-foot buffers.

A drainage report should be provided that describes the existing drainage patterns, site discharge locations, and discharge characteristics (Is runoff concentrated in a pipe or stream? Is it unconcentrated overland sheet flow? Etc.). Review of the existing site plan reveals two potential discharge locations based on topography alone.

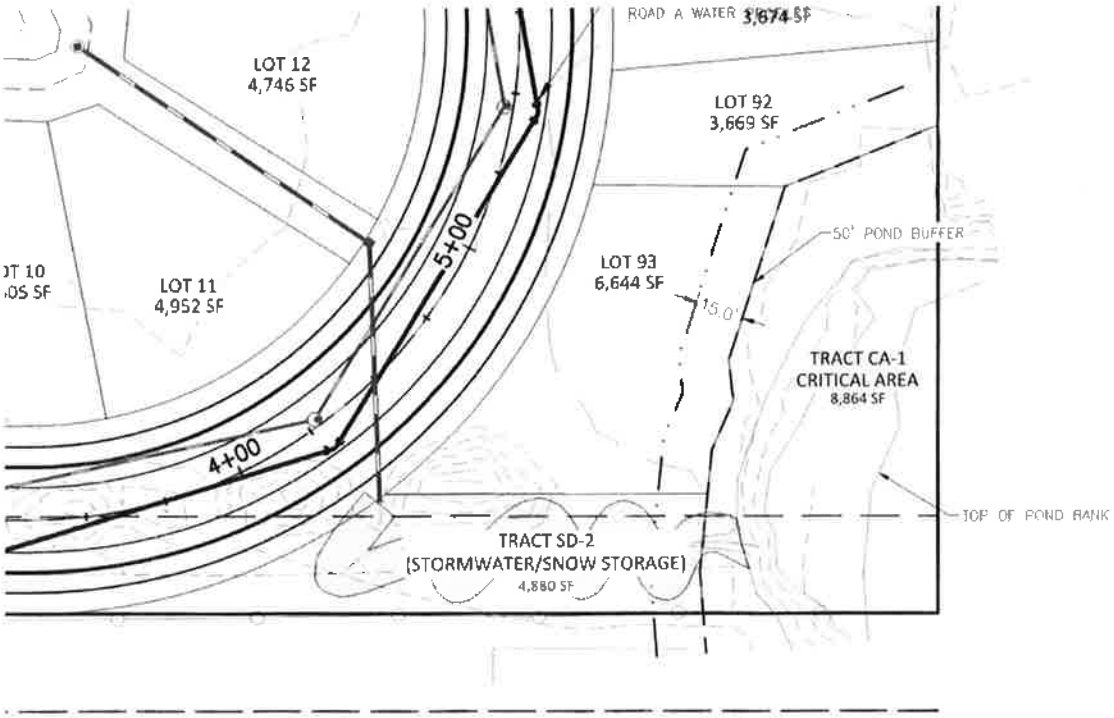
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The clip below shows directional slope arrows depicting the path runoff would travel over the existing site, for reference. The exhibit was clipped from C1.0 of the Preliminary Plans, titled Existing Conditions.



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The project appears to be proposing a stormwater swale with concentrated runoff discharge to the man-made pond. The stormwater BMP in Tract SD-2 appears to impact the 50-foot pond buffer. The clip below was taken from sheet C4.0 of the Preliminary Plans, titled Water Plan.



A discussion of the drainage discharge rational should be included with the SEPA Checklist that shows this pond is ultimately the existing receiving water for the entire project area, if this is being proposed.

If existing site discharge locations bypassed the pond originally, it would be unusual to re-direct runoff to this location without justifying added stormwater volumes to a critical area. Likewise, potentially depriving stormwater volumes to critical areas downstream of the alternative discharge location. In addition, buffer impacts and the change in discharge profile from unconcentrated discharge to concentrated discharge should be justified, if that's what is being proposed. Maintaining tributary sizes to critical areas is a cornerstone in the drainage analysis.

We noted that the proposal seems to show the lowest priority discharge option in the SWMMEW for meeting this requirement without justification for bypassing the higher priority options or mitigating potential impacts of the proposed discharge.

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CE5: Runoff Treatment

The SWMMEW New Development Project Thresholds states that runoff treatment is required for projects that add 5,000 square feet, or more, of new plus replaced pollution generating hard surface area (roads and driveways) or convert 3/4 of an acre or more of vegetation to lawn or landscaped areas. There is no question that this project exceeds 5,000 square feet of PGIS and will convert ¾ of an acre of existing mowed pastureland to lawn or managed residential yard areas.

There are several steps to identifying the treatment regime required for the project. For example:

- Oil control: uncommon for residential projects unless roads in the development exceed traffic counts stated in the SWMMEW. Commercial and industrial projects with just 300 total trip ends per day trigger oil control. The TIA provided with this project states ADT will be over 700 trips. Oil control could be considered for a project this size.
- Phosphorus control; usually required for basins that have a documented Management Plan, TMDL, or similar. This can be common for projects that discharge to waters of the State (a lake). The City should consider this treatment as the Lake, apparently made for irrigation at one point, is now private recreational waterfront, it has fish, and it discharges to the Yakima River. So it could benefit from a Lake Management Plan. The project size has also exceeded the ¾ acre surface conversion to managed yards where fertilizers and pesticides/herbicides can become a pollutant of concern.
- Metals Treatment: this is very common and applicable to multi-family projects. A large portion of this project is zoned for Multiple-Family development. From SWMMEW, chapter 6.1.2, "For project sites with a mix of land use types, Metals Treatment BMPs are required when the runoff from the areas subject to the Metals Treatment Performance Goal comprises 50% or more of the total runoff from the project site."
- Basic Treatment: this treatment is required for every project triggering Runoff Treatment, at a minimum.

For residential development pollutants of concern are total suspended solids, nutrients (fertilizers), and pesticides/herbicides. Multi-family residential projects are typically required to add Metals Treatment to the Basic Treatment requirement. There is a separate set of criteria applicable to groundwater protection if infiltration BMPs are implemented in the design. (These pollutants are identified in Chapter 6.1.2 of the SWMMEW).

The preliminary stormwater memo, exhibit B-14, identifies native soils or soil amendment filtration for infiltrating stormwater and biofiltration swale for runoff that overflows the pond in tract SD-1.

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It's possible that one treatment BMP can provide multiple levels of treatment as required in the SWMMEW. A drainage report and Stormwater Site Plan should be provided with the SEPA Checklist to demonstrate the appropriate level of treatment is provided based on the discharge location (ground, lake, or both in this case).

Runoff treatment via infiltration:
The project should provide testing of native soils to verify they meet the Site Suitability Criteria from chapter 6.5.6 of the SWMMEW. The alternative is to amend the soil below the infiltration BMP to provide a filter. In this case, the project has potential high groundwater below the infiltration BMP and the Geotechnical Feasibility Study, Exhibit B-04, has stated that the soils above the water table are not suitable for infiltration (section 5.6 of that report). Adding amended soil below the infiltration BMP, if required, would only decrease the vertical groundwater separation requirement.

Runoff treatment via Biofiltration Swale:
Chapter 6.1.2 of the SWMMEW identifies a Basic Biofiltration Swale as meeting the Basic Treatment BMP. This treatment BMP is very common in residential application. However, multi-family projects require Metals Treatment per chapter 6.1.2 of the SWMMEW. There is a good case for the Multiple-Family zone that the proposed duplexes trigger Metals treatment. In this case, runoff can either be treated separately from the areas requiring Basic Treatment; or, if mixed, the more stringent level of treatment would apply to all runoff.

The following flow chart shows specifically the procedural thought process behind selecting a treatment BMP (from chapter 6.1.2 of the SWMMEW).

START HERE — Step 1: Determine location of project site discharge

Evaporation Pond or Full Dispersion (BMP F6.42) → Selection done

COMBINED SEWER (CSO) → See local requirements

SURFACE WATER (direct or via conveyance system) → **Step 2:** Determine receiving waters and pollutants of concern; perform downstream analysis → **Step 3:** Determine if oil control is required

- **Yes** → **Apply Oil Control BMP**
  - API separator
  - CP separator
  - Linear sand filter*
  - Compost Amended Vegetated Filter Strip (CAVFS)**
  - Bioinfiltration swale*
  - Bioretention*
  - Emerging tech.
- **No** → **Step 4:** Determine if phosphorus treatment is required
  - **Yes** → **Apply Phosphorus Treatment BMP**
    - Large sand filter
    - Large wetpond*
    - Two BMP treatment train
    - Emerging tech.
  - **No** → **Step 5:** Determine if metals treatment is required
    - **Yes** → **Step 5:** Determine if metals treatment is required
      - **No** → Selection done
      - **Yes** → **Apply Metals Treatment BMP**
        - Two BMP treatment train
        - Bioinfiltration swale
        - Bioretention
        - Infiltration pond
        - Infiltration trench
        - Emerging tech.

        → Selection done
    - **No** → **Step 6: Apply a Basic Treatment Facility BMP**
      - Bioinfiltration swale
      - Biofiltration swale
      - Bioretention
      - Vegetated filter strip
      - Wetpond
      - Wetvault
      - Combined detention/wetpond
      - Sand filter
      - Emerging tech.

      → Selection done

SURFACE INFILTRATION → **Apply Oil Control BMP if required**
- API separator
- CP separator
- Linear sand filter*
- CAVFS**
- Bioinfiltration swale*
- Bioretention*
- Emerging tech.

→ **Apply Pretreatment prior to surface infiltration**
- Presettling basin
- Any basic treatment BMP utilizing sedimentation/ settling *
- Emerging tech.

→ **Apply Surface Infiltration BMP*****
- Infiltration pond
- Infiltration trench
- Bioinfiltration swale **

→ Selection done

SUBSURFACE INFILTRATION → See Runoff Treatment BMP Selection Flow Chart for Discharges to Subsurface Infiltration Systems (UIC Wells)

* See Oil Control Requirements in Core Element #5 for additional requirements regarding use of sorptive BMPs, such as filters and biofiltration or bioinfiltration swales, for some high-use sites and high ADT traffic areas.

** High-use roadways and parking areas only (see the latest version of the WSDOT Highway Runoff Manual)

*** Refer to Site Suitability Criteria in Chapter 5. If SSC are not met, provide runoff treatment as required prior to infiltration.

REQUIRES 100-FT SETBACK FROM LAKE DISCHARGE

DEPARTMENT OF ECOLOGY
State of Washington

Runoff Treatment BMP Selection Flow Chart

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Revised September 2018

In addition, the SWMMEW, section 6.1.7, states infiltration BMPs should be setback 100-feet from open water features. Alternative setbacks might apply to other treatment BMPs.

The Sewer Plan and Water Plan included with the SEPA Checklist do not clearly identify a stormwater treatment BMP but there is shading/hatching that appears to extend into the Critical Area buffer.

We have demonstrated that multi-family projects trigger a higher level of runoff treatment than standard single-family projects and that the Geotechnical Feasibility Report has stated that infiltration is infeasible in this area. A drainage report and stormwater site plan should be submitted that clarifies how Core Element 5 will be met by this project. Please clarify how this project meets the Runoff Treatment requirement?

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CE6: Flow Control

The SWMMEW, chapter 2.4.6, for New Development Project Thresholds states,

Projects must limit the peak release rate of the post-developed 2-year, 24-hour peak flow to 50% of the pre-developed 2-year, 24-hour peak flow and maintain the pre-developed 25-year, 24-hour peak runoff rate. Check the 100-year, 24-hour event for downstream flooding and property damage.

Additionally, the 10-year, 24-hour rainfall event must be retained on-site without any discharge to the MS4.

The above requirements must be demonstrated using a single-event model.

The pre-developed condition used for the analysis shall be the existing land cover.

Supplemental to the SWMMEW the 2024 Cle Elum Construction Standards for the Private Construction of Public Facilities, Chapter 6, contains precipitation and design assumptions for pond sizing.

The Geotechnical Feasibility Study provided by PanGeo, dated June 21, 2021, documents summertime groundwater at depths ranging from 4.5-feet to greater than 10-feet deep and notes that wet season fluctuation might increase up to 1.5-feet based on an offsite study using monitoring wells to monitor wet season groundwater levels. The location of the Stormwater Tract SD-1 appears to be located between four test pit locations that documented groundwater depths of 4.5-feet to 8-feet, or 3 to 6.5-feet deep with potential wet season fluctuation. The SWMMEW generally requires 5-feet of vertical separation from the bottom of an infiltration facility and the maximum water table elevation. Ultimately, the report concludes that the top 4 to 6-feet of Fine Alluvium overlaying the site contains a high amount of fine sediment and is not suitable for infiltration.

No flow control sizing analysis was submitted with the SEPA Checklist to verify that the flow control requirement has been met. We have made interpretations from the SEPA Checklist and the Sewer and Water Plans that an open pond is proposed within the Stormwater Tract SD-1.

The final flow control BMP sizing will be contingent on several variables such as curve numbers, soil characteristics, infiltration feasibility, and final buildout of the project.

However, to approximate the size of a hypothetical stormwater detention/retention pond with no infiltration, as stated in the Geotechnical infiltration feasibility report, we used 60% impervious land coverage for the project area to estimate the size of a 5-foot-deep stormwater detention pond (with 4-feet of live storage). The hypothetical bottom

pond area calculated was approximately 10,000 square feet and the top pond area was 15,400 square feet. For perspective, the Tract SD-1 is approximately 11,491 square feet, just 75% of the hypothetical pond area calculated. The hypothetical pond area is 4 to 5% of the project area which is reasonable for this size development.

Another hypothetical retention pond was sized assuming a 0.57 inch/hour infiltration rate. That pond with the same bottom area footprint is still 4.5 feet deep (assuming 1-foot of freeboard).

Both retention pond scenarios demonstrate that the proposed stormwater tracts could be undersized. It would be prudent to request a preliminary drainage report and stormwater site plan to verify the project meets the stormwater mitigation requirements.

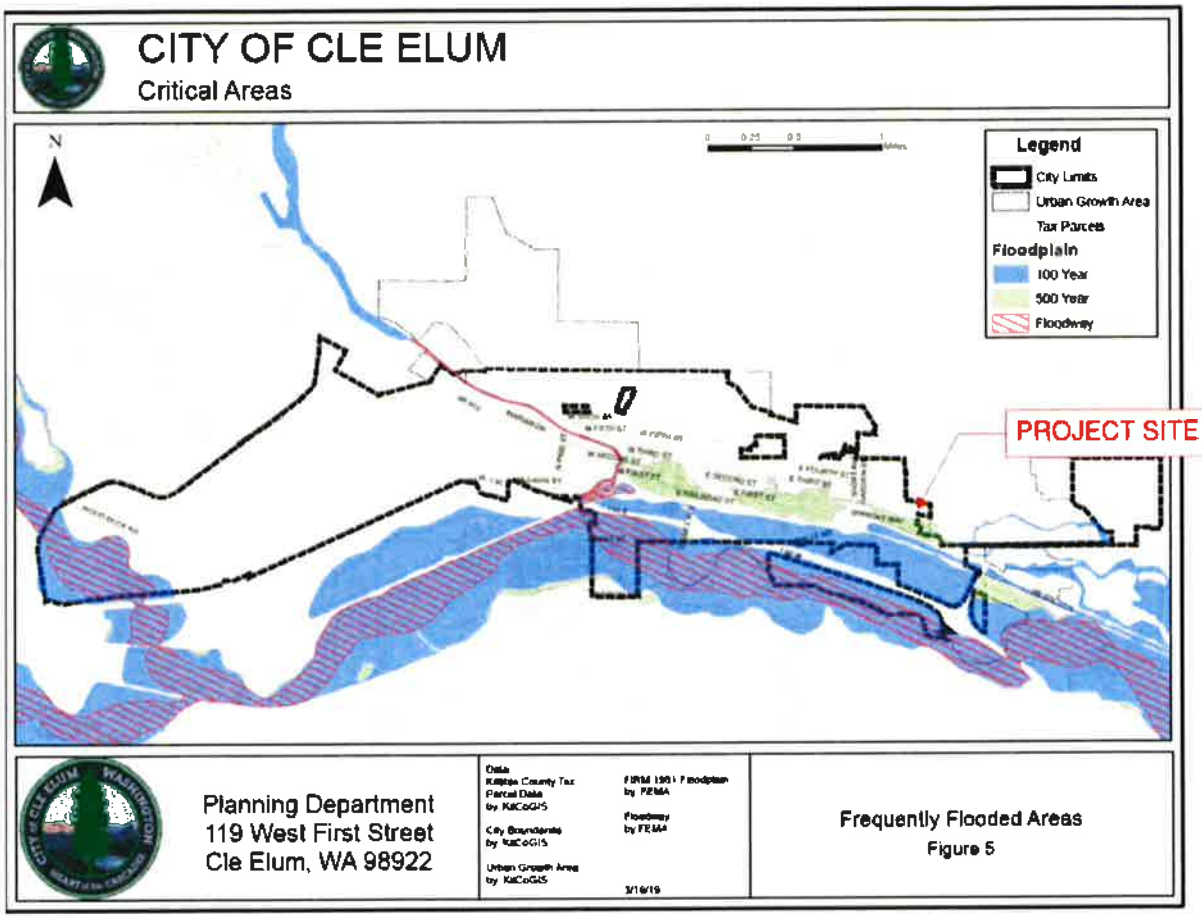
Please clarify how the project meets the requirement for Flow Control?

APM2: Off-Site Analysis Report

A typical drainage report identifies the basin and studies both the upstream and downstream areas. In this case, it appears the downstream Type F stream crosses Cle Elum Airport Road (flowing south). The 2019 City of Cle Elum Comprehensive Plan has identified the downstream area containing the 500-year and 100-year flooding zones. Areas of frequent flooding can be justification to increase the standard of flow control. For example, discharging developed runoff rates at the pre-developed rate for up to the 50-year or 100-year peak storm event in lieu of just the 25-year peak. In our experience, this would be a typical requirement for projects discharging to capacity restrained systems.

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The upstream basin area should be reviewed for areas that drain onto the property. A conveyance system that bypasses runoff around stormwater mitigation BMPs should be provided is there is a significant source of upstream runoff. To ignore this, a retention pond or retention BMP could be overwhelmed prematurely or even lead to failure.

Please clarify if the documented downstream flooding area warrants a higher level of stormwater retention/detention?

Closing

Our review of the project documents submitted with the SEPA Checklist fail to clearly identify the mitigating stormwater elements for the project relevant to project this size. A preliminary stormwater memo was provided that states the primary retention system relies on stormwater infiltration which contradicts the Geotechnical report stating that infiltration is infeasible in the top 5 to 6-feet of soil and the site contains relatively high ground water below that.

The project is proposing stormwater discharge to a fish-bearing critical area. The critical area buffer and it should not be used as a zone for runoff retention or treatment. Our concern is that once a proper stormwater analysis has been completed for this project it could add or increase the size of the stormwater tracts shown; and, therefore, reduce the buildable area. Please consider requesting a stormwater design for review.

The hypothetical retention pond sizing calculations using HydroCAD software simulating two retention pond scenarios including a pond without infiltration and a pond with infiltration have been enclosed with this letter for review.

Thank you,



Cecil & Associates, LLC
John C. Farleigh, P.E.

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RETENTION POND CALCULATIONS

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EXISTING SITE PEAK RUNOFF RATES

TABLE 6-1 PRECIPITATION EVENT INFORMATION	
Storm Event	**Precipitation (Inches)**
6-Month, 3-Hour Storm Event	0.44
6-Month, 24-Hour Storm Event	1.22
2-Year, 24-Hour Storm Event	1.74
10-Year, 24-hour Storm Event	2.90
25-Year, 3-Hour Storm Event	1.11
25-Year, 24-Hour Storm Event	3.48
50-Year, 24-Hour Storm Event	4.06
100-Year, 24-Hour Storm Event	4.64
Source: *Stormwater Management Manual for Eastern Washington*, Ecology, Aug. 2024 Note: 24-hour precipitation amounts have been adjusted for use in the long-duration regional storm distribution.	

Select Curve Number

line	Description	Condition	A	B	C	D	Condensed Description
0	CN Values for Ia = 0.20 S						
1	FULLY DEVELOPED URBAN AREAS	Veg Estab					
2	Open space (Lawns,parks etc.)						
3	grass cover < 50%	Poor	68	79	86	89	<50% Grass cover, Poor
4	grass cover 50% to 75%	Fair	49	69	79	84	50-75% Grass cover, Fair
5	grass cover > 75%	Good	39	61	74	80	>75% Grass cover, Good
W1	Pond and Lake Surfaces						
W2	Classified as Impervious		98	98	98	98	Water Surface
W3	Classified as Pervious	0% imp	98	98	98	98	Water Surface, 0% imp
6	Impervious Areas						
7	Paved parking lots, driveways		98	98	98	98	Paved parking
7a	Unconnected Impervious		98	98	98	98	Unconnected pavement
7b	Roofs		98	98	98	98	Roofs
7c	Unconnected Impervious		98	98	98	98	Unconnected roofs
8	Streets and roads						
9	Paved; curbs and storm sewers		98	98	98	98	Paved roads w/curbs & sewers
10	Paved; open ditches (w/ROW)	50% imp	83	89	92	93	Paved roads w/open ditches, 5
11a	Gravel (w/o right-of-way)		96	96	96	96	Gravel surface
11	Gravel (w/ right-of-way)		76	85	89	91	Gravel roads
12	Dirt (w/ right-of-way)		72	82	87	89	Dirt roads
13	Urban Districts	impervious					
14	Commercial & business	85% imp	89	92	94	95	Urban commercial, 85% imp
15	Industrial	72% imp	81	88	91	93	Urban industrial, 72% imp
16	Residential districts						
17	(by average lot size)	impervious					
18	1/8 acre (town houses)	65% imp	77	85	90	92	1/8 acre lots, 65% imp
19	1/4 acre	38% imp	61	75	83	87	1/4 acre lots, 38% imp
20	1/3 acre	30% imp	57	72	81	86	1/3 acre lots, 30% imp
21	1/2 acre	25% imp	54	70	80	85	1/2 acre lots, 25% imp
22	1 acre	20% imp	51	68	79	84	1 acre lots, 20% imp
23	2 acre	12% imp	46	65	77	82	2 acre lots, 12% imp
24	Western Desert Urban Areas						
25	Natural desert (pervious areas only)		63	77	85	88	Natural western desert
26	Artifical desert landscaping		96	96	96	96	Artifical desert landscape
29	DEVELOPING URBAN AREA	(No Veg)					
30	Newly graded area (pervious only)		77	86	91	94	Newly graded area
31	CULTIVATED AGRICULTURAL LAND						
32	Fallow						
33	Bare soil		77	86	91	94	Fallow, bare soil
34	Crop residue (CR)	Poor	76	85	90	93	Fallow, crop residue, Poor
35	Crop residue (CR)	Good	74	83	88	90	Fallow, crop residue, Good
36	Row crops						
37	Straight row (SR)	Poor	72	81	88	91	Row crops, straight row, Poor
38	Straight row (SR)	Good	67	78	85	89	Row crops, straight row, Good

OK Cancel Help

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This report was prepared with the free HydroCAD SAMPLER, which is licensed for evaluation and educational use ONLY. For actual design or modeling applications you MUST use a full version of HydroCAD which may be purchased at www.hydrocad.net. Full programs also include complete technical support,training materials, and additional features which are essential for actual design work.

Summary for Subcatchment 1S: Existing Site

[49] Hint: Tc<2dt may require smaller dt

Runoff = 0.13 cfs @ 19.65 hrs, Volume= 0.132 af, Depth> 0.13"
Routed to nonexistent node 5P

Runoff by SBUH method, Split Pervious/Imperv., Time Span= 0.00-24.00 hrs, dt= 1.00 hrs
Type IA 24-hr 2-yr Rainfall=1.74"

Area (ac)	CN	Description
11.970	69	50-75% Grass cover, Fair, HSG B
11.970	69	100.00% Pervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
5.0					**Direct Entry, Impervious**

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Summary for Subcatchment 1S: Existing Site

[49] Hint: Tc<2dt may require smaller dt

Runoff = 1.10 cfs @ 9.08 hrs, Volume= 0.936 af, Depth> 0.94"
Routed to nonexistent node 5P

Runoff by SBUH method, Split Pervious/Imperv., Time Span= 0.00-24.00 hrs, dt= 1.00 hrs
Type IA 24-hr 25-yr Rainfall=3.48"

Area (ac)	CN	Description
11.970	69	50-75% Grass cover, Fair, HSG B
11.970	69	100.00% Pervious Area

Tc (min)	Length (feet)	Slope (ft/ft)	Velocity (ft/sec)	Capacity (cfs)	Description
5.0					**Direct Entry, Impervious**

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DEVELOPED SITE WITH POND
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Summary for Pond 2P: Tract SD-1

Inflow Area = 11.970 ac, 60.00% Impervious, Inflow Depth > 0.96" for 2-yr event
Inflow = 1.72 cfs @ 8.26 hrs, Volume= 0.959 af
Outflow = 0.07 cfs @ 24.00 hrs, Volume= 0.089 af, Atten= 96%, Lag= 944.6 min
Primary = 0.07 cfs @ 24.00 hrs, Volume= 0.089 af

Routing by Stor-Ind method, Time Span= 0.00-24.00 hrs, dt= 1.00 hrs
Peak Elev= 1,884.21' @ 24.00 hrs Surf.Area= 0.307 ac Storage= 0.860 af

Plug-Flow detention time= 657.4 min calculated for 0.086 af (9% of inflow)
Center-of-Mass det. time= 210.1 min (943.4 - 733.3)

Volume	Invert	Avail.Storage	Storage Description
#1	1,881.00'	2.211 af	**50.00'W x 200.00'L x 7.00'H Prismatoid Z=2.0**

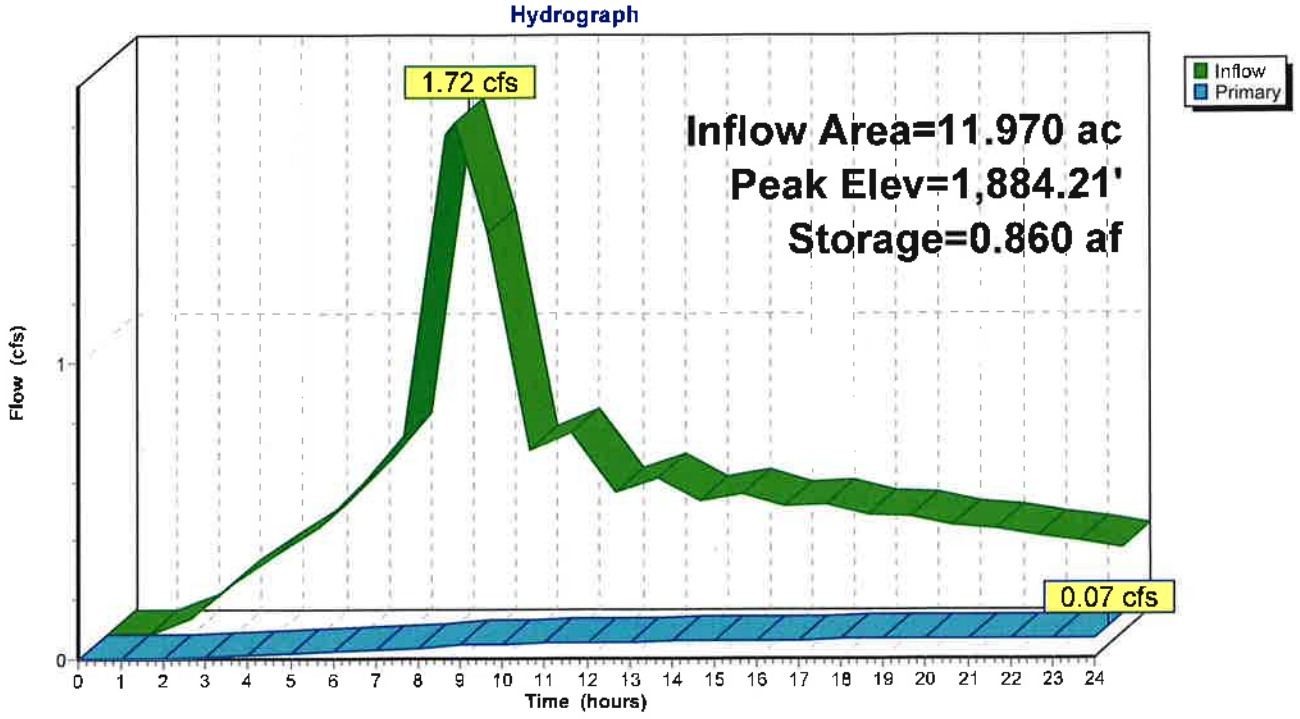
Device	Routing	Invert	Outlet Devices
#1	Primary	1,881.00'	**1.2" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#2	Primary	1,884.25'	**6.6" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#3	Primary	1,886.00'	**1.5' long Sharp-Crested Rectangular Weir** 2 End Contraction(s) 0.5' Crest Height

Primary OutFlow Max=0.07 cfs @ 24.00 hrs HW=1,884.21' (Free Discharge)
↑—**1=Orifice/Grate** (Orifice Controls 0.07 cfs @ 8.63 fps)
—**2=Orifice/Grate** (Controls 0.00 cfs)
—**3=Sharp-Crested Rectangular Weir** (Controls 0.00 cfs)

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Summary for Pond 2P: Tract SD-1

Inflow Area = 11.970 ac, 60.00% Impervious, Inflow Depth > 2.32" for 25-yr event
Inflow = 3.95 cfs @ 8.30 hrs, Volume= 2.314 af
Outflow = 1.10 cfs @ 15.20 hrs, Volume= 1.289 af, Atten= 72%, Lag= 413.5 min
Primary = 1.10 cfs @ 15.20 hrs, Volume= 1.289 af

Routing by Stor-Ind method, Time Span= 0.00-24.00 hrs, dt= 1.00 hrs
Peak Elev= 1,885.05' @ 15.20 hrs Surf.Area= 0.329 ac Storage= 1.126 af

Plug-Flow detention time= 517.6 min calculated for 1.237 af (53% of inflow)
Center-of-Mass det. time= 278.4 min (1,005.1 - 726.7)

Volume	Invert	Avail.Storage	Storage Description
#1	1,881.00'	2.211 af	**50.00'W x 200.00'L x 7.00'H Prismatoid Z=2.0**

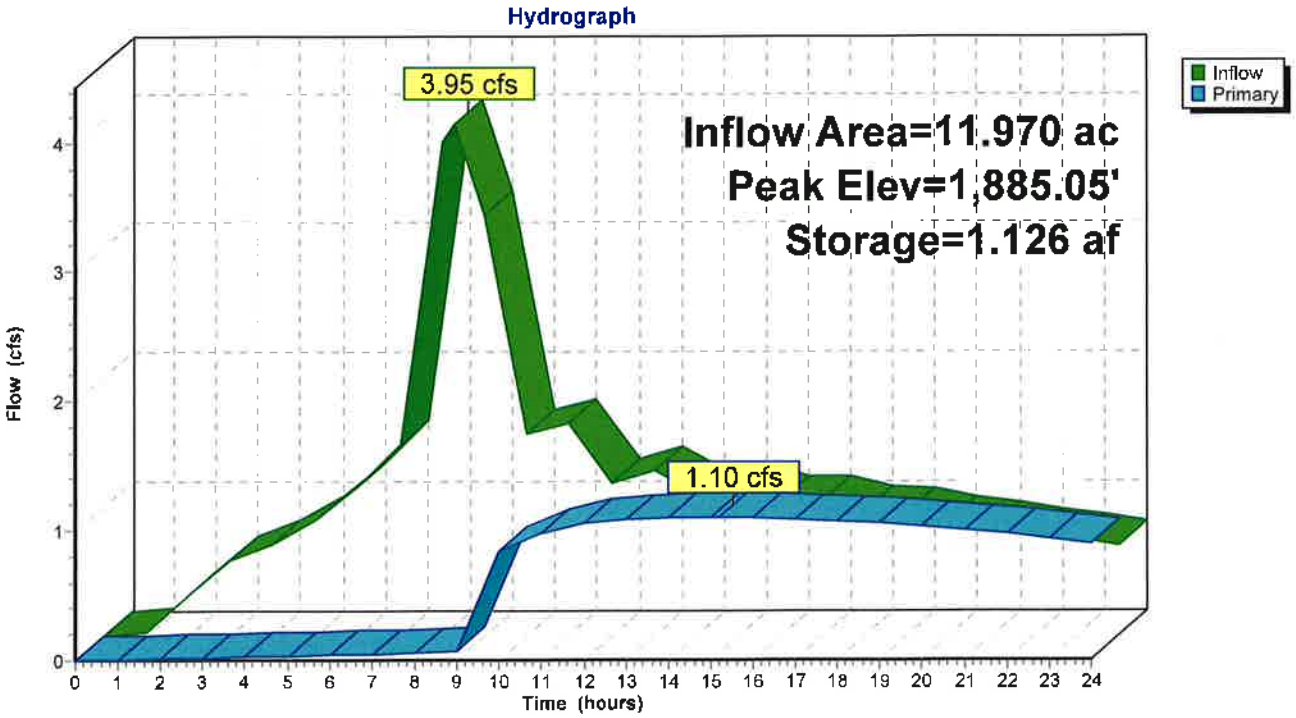
Device	Routing	Invert	Outlet Devices
#1	Primary	1,881.00'	**1.2" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#2	Primary	1,884.25'	**6.6" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#3	Primary	1,886.00'	**1.5' long Sharp-Crested Rectangular Weir** 2 End Contraction(s) 0.5' Crest Height

Primary OutFlow Max=1.10 cfs @ 15.20 hrs HW=1,885.05' (Free Discharge)
- **1=Orifice/Grate** (Orifice Controls 0.08 cfs @ 9.69 fps)
- **2=Orifice/Grate** (Orifice Controls 1.02 cfs @ 4.30 fps)
- **3=Sharp-Crested Rectangular Weir** (Controls 0.00 cfs)

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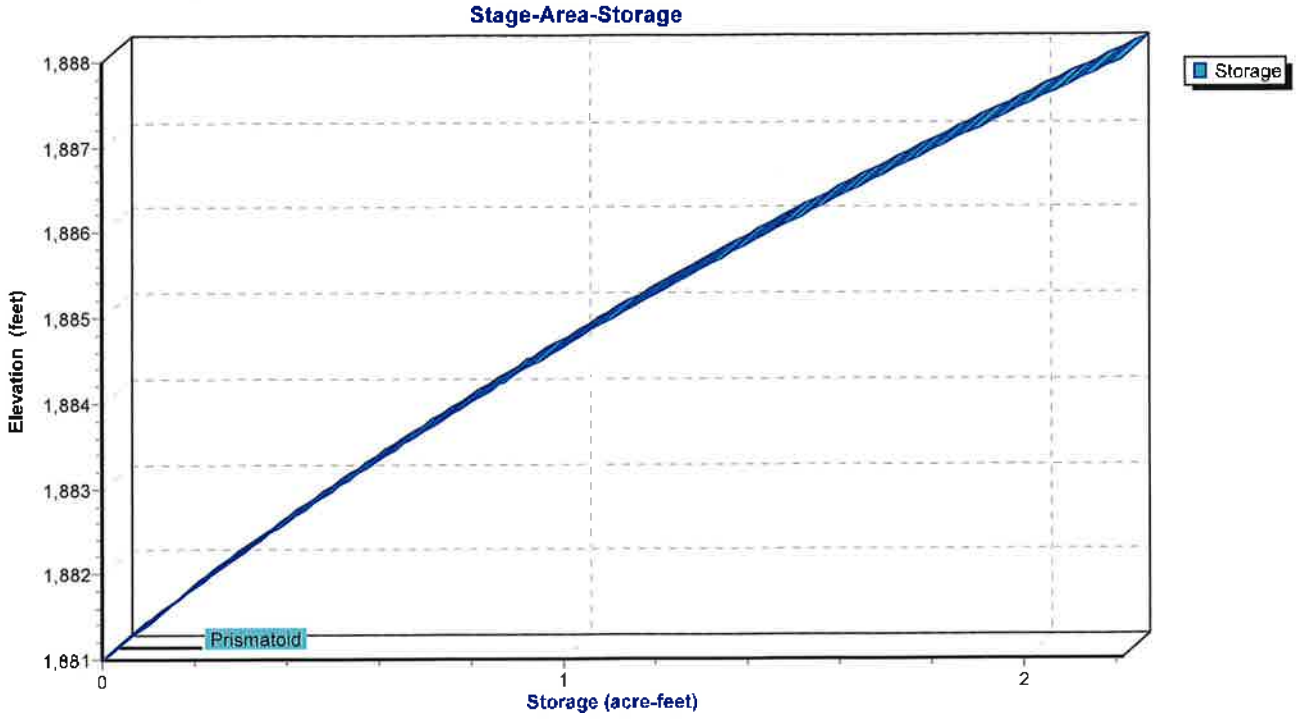
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DEVELOPED SITE WITH POND
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Summary for Pond 2P: Tract SD-1

Inflow Area = 11.970 ac, 60.00% Impervious, Inflow Depth > 0.96" for 2-yr event
Inflow = 1.72 cfs @ 8.26 hrs, Volume= 0.959 af
Outflow = 0.12 cfs @ 24.00 hrs, Volume= 0.140 af, Atten= 93%, Lag= 944.6 min
Discarded = 0.04 cfs @ 24.00 hrs, Volume= 0.047 af
Primary = 0.07 cfs @ 24.00 hrs, Volume= 0.093 af

Routing by Stor-Ind method, Time Span= 0.00-24.00 hrs, dt= 1.00 hrs
Peak Elev= 1,884.05' @ 24.00 hrs Surf.Area= 0.303 ac Storage= 0.812 af

Plug-Flow detention time= 673.8 min calculated for 0.140 af (15% of inflow)
Center-of-Mass det. time= 256.9 min (990.3 - 733.3)

Volume	Invert	Avail.Storage	Storage Description
#1	1,881.00'	2.211 af	**50.00'W x 200.00'L x 7.00'H Prismatoid Z=2.0**

Device	Routing	Invert	Outlet Devices
#1	Discarded	1,881.00'	**0.570 in/hr Exfiltration over Surface area above 1,881.00'** Conductivity to Groundwater Elevation = 1,800.00' Excluded Surface area = 0.230 ac
#2	Primary	1,881.25'	**1.3" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#3	Primary	1,884.10'	**6.6" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#4	Primary	1,886.00'	**1.5' long Sharp-Crested Rectangular Weir** 2 End Contraction(s) 0.5' Crest Height

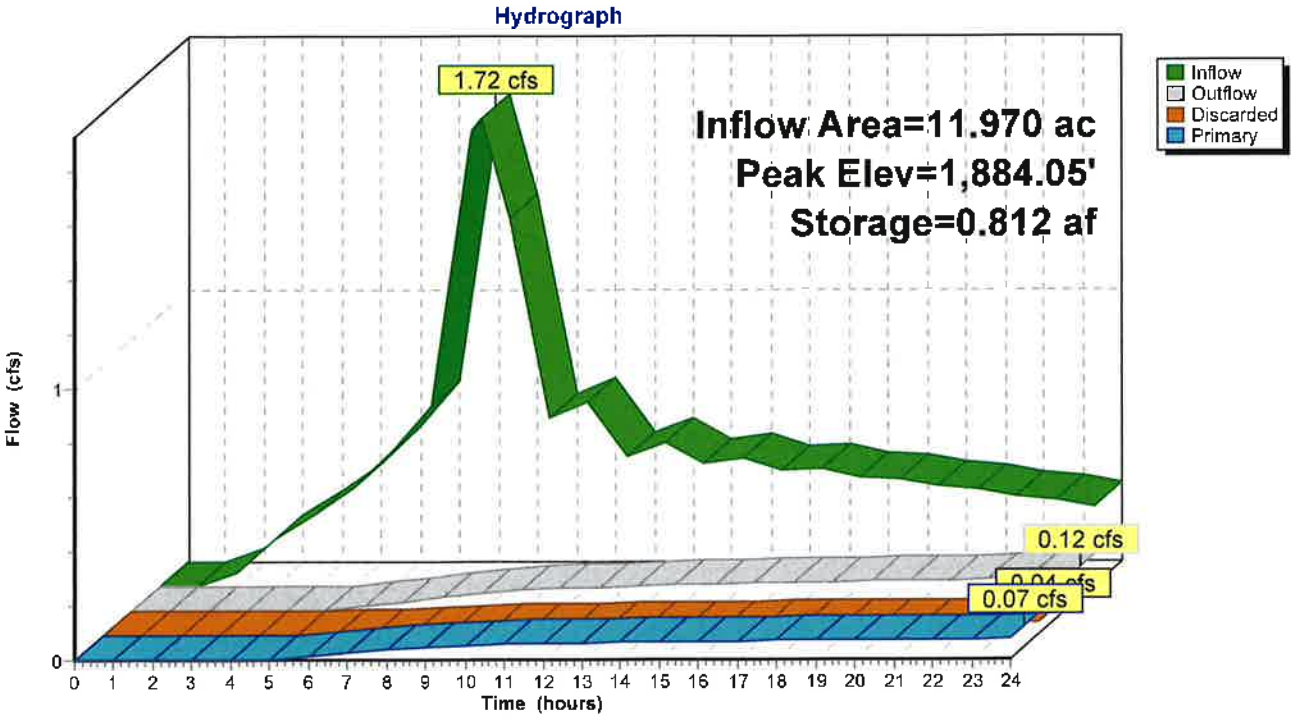
Discarded OutFlow Max=0.04 cfs @ 24.00 hrs HW=1,884.05' (Free Discharge)
↑—**1=Exfiltration** (Controls 0.04 cfs)

Primary OutFlow Max=0.07 cfs @ 24.00 hrs HW=1,884.05' (Free Discharge)
↑—**2=Orifice/Grate** (Orifice Controls 0.07 cfs @ 8.06 fps)
—**3=Orifice/Grate** (Controls 0.00 cfs)
—**4=Sharp-Crested Rectangular Weir**(Controls 0.00 cfs)

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Summary for Pond 2P: Tract SD-1

Inflow Area =	11.970 ac,	60.00% Impervious,	Inflow Depth >	2.32"	for 25-yr event
Inflow =	3.95 cfs @	8.30 hrs,	Volume=	2.314 af	
Outflow =	1.16 cfs @	13.97 hrs,	Volume=	1.359 af,	Atten= 71%, Lag= 339.8 min
Discarded =	0.06 cfs @	13.97 hrs,	Volume=	0.077 af	
Primary =	1.10 cfs @	13.97 hrs,	Volume=	1.282 af	

Routing by Stor-Ind method, Time Span= 0.00-24.00 hrs, dt= 1.00 hrs
Peak Elev= 1,884.89' @ 13.97 hrs Surf.Area= 0.324 ac Storage= 1.074 af

Plug-Flow detention time= 501.2 min calculated for 1.359 af (59% of inflow)
Center-of-Mass det. time= 265.1 min (991.8 - 726.7)

Volume	Invert	Avail.Storage	Storage Description
#1	1,881.00'	2.211 af	**50.00'W x 200.00'L x 7.00'H Prismatoid Z=2.0**

Device	Routing	Invert	Outlet Devices
#1	Discarded	1,881.00'	**0.570 in/hr Exfiltration over Surface area above 1,881.00'** Conductivity to Groundwater Elevation = 1,800.00' Excluded Surface area = 0.230 ac
#2	Primary	1,881.25'	**1.3" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#3	Primary	1,884.10'	**6.6" Horiz. Orifice/Grate** C= 0.600 Limited to weir flow at low heads
#4	Primary	1,886.00'	**1.5' long Sharp-Crested Rectangular Weir** 2 End Contraction(s) 0.5' Crest Height

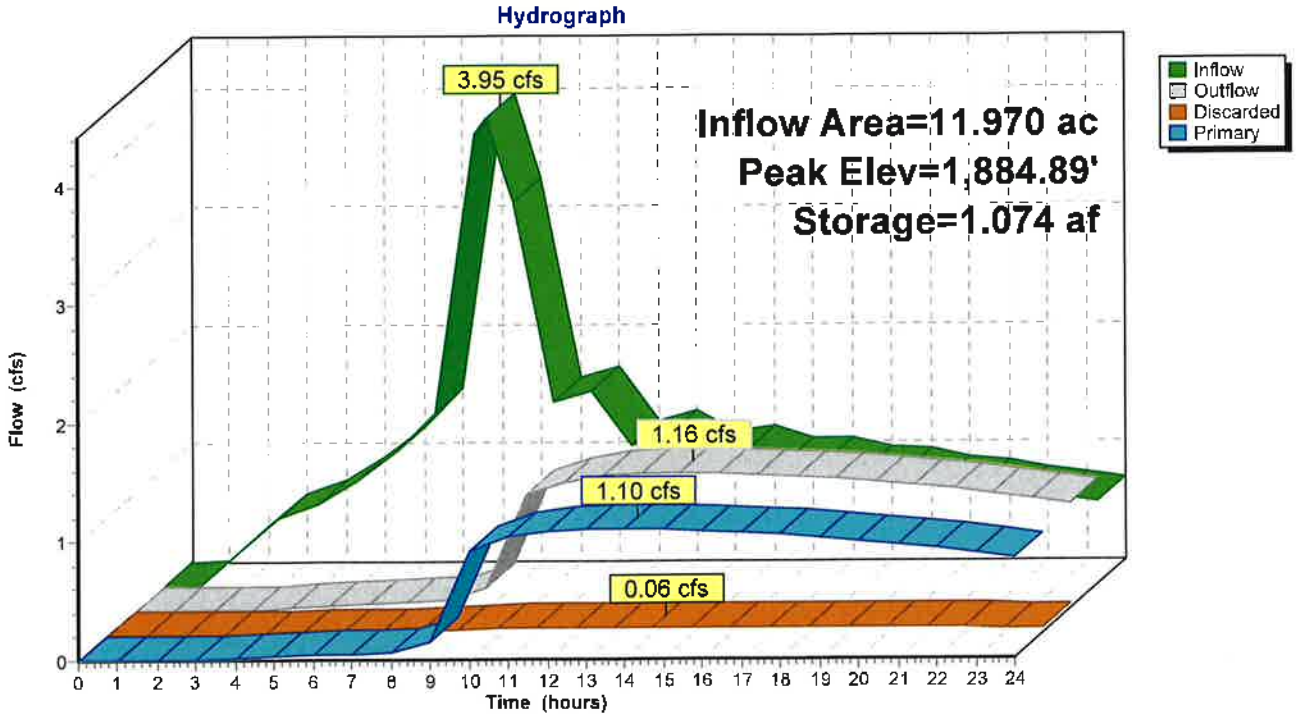
Discarded OutFlow Max=0.06 cfs @ 13.97 hrs HW=1,884.89' (Free Discharge)
└**1=Exfiltration** (Controls 0.06 cfs)

Primary OutFlow Max=1.10 cfs @ 13.97 hrs HW=1,884.89' (Free Discharge)
├**2=Orifice/Grate** (Orifice Controls 0.08 cfs @ 9.19 fps)
├**3=Orifice/Grate** (Orifice Controls 1.02 cfs @ 4.28 fps)
└**4=Sharp-Crested Rectangular Weir** (Controls 0.00 cfs)

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Exhibit 2

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PETERSON RUSSELL KELLY LIVENGOOD PLLC
10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700 | F: 425.471.0714

John Farleigh, PE, LEED AP
PO Box 598
Bothell, WA 98041

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Email: johnf@cecilnassoc.com
Phone: (206) 450-3068



Personal Statement

I'm a twenty-year professional civil engineer and 10 yr principal and owner of Cecil & Associates, LLC. My career expertise includes both large and small highly technical civil site development projects throughout Washington and Oregon. I specialize in land development across multiple market sectors such as education (preschool/early learning through high school); healthcare including specialty clinics and hospitals; commercial including retail, restaurant, warehouse, office; and residential including large homes, DADUS, and subdivisions. I have spent my career working collaboratively with developers and contractors through project permitting, construction support, and project closeout.

Career Strengths and Accomplishments

- 10-Year Principal & Owner Cecil & Associates LLC
- 20-Year Civil Project Engineer
- 15-years mentorship Working closely with engineering interns
- 20 years Teamwork collaborating with interdisciplinary engineers, architects, surveyors, environmentalists, and clients/owners
- Strong Land Development Focus involving building complex and detailed engineering plans associated with demolition, erosion control, grading & paving, water & wastewater, stormwater.
- Independently developed proposals and worked with clients to determine project feasibility, detail Permitting requirements, and have provided detailed Site reports throughout Construction.
- Regularly participate in owner/contractor meetings for both project design and construction purposes.
- Participate in internal company scheduling for project teams to coordinate projects needs for engineering, drafting, and management.
- Highly competent in Stormwater Modeling – Low Impact Development (LID) utilizing both temporary and permanent stormwater BMPs. Provided highly technical conveyance, flow control, and runoff treatment calculations including drainage report documentation for regulatory agencies with strict code requirements.
- Sized detention and retention structures and designed bioswales, raingardens, and stormwater ponds in rural and urban environments.
- Guided clients through environmental critical area (ECA) requirements pertaining to various ECA's including steep slopes, wetlands, streams, and erosion hazards.
- Completed stormwater permitting required for soil contamination through WA State Department of Ecology.
- Produced DOT-style plans for approval through agencies such as WSDOT, Seattle DOT, Tacoma DOT, King County, Snohomish County, and Pierce County.
- Routinely permit construction activities via producing Stormwater Pollution Prevention Plans (SWPPPs) and permitting through WA State Dept. of Ecology and OR State DEQ.
- Highly experienced at engineering cost estimates utility and earthwork takeoffs and bond calculations
- Thorough Understanding of Underground Utility Design: Wastewater, Domestic & Fire Water, Stormwater, Telecommunication, Power, and Natural gas.
- Specialized in Project Permitting including Construction Stormwater, SEPA, Land Use Approvals, Preliminary Plat (Subdivisions), and Construction Permits.
- Solely responsible for Preparing client contracts and proposals and developing subcontractor contracts as needed using the AIA platform as well as current firms technical contract documentation.
- Guided clients on project phasing during development of engineering documents for multi-year phased construction projects with variables including seasonal weather, budgets, and permitting.
- Technically advanced at Drafting/Civil 3D design: Plans, Profiles, Surfaces, HydroCAD, Cut/Fill Quantities, and 3D utilities.
- Participated in multi-discipline (3D) BIM coordination

John Farleigh, PE, LEED AP
PO Box 598
Bothell, WA 98041
Email: johnf@cecilnassoc.com
Phone: (206) 450-3068

- Experienced with Topographic, Utility, and Construction Surveying
- Permitted several Developer Extensions for Sewer and Water systems improving public infrastructure regulated by specific utility purveyors (water and sewer districts)
- Completed public roadway designs including road widening, pedestrian improvements, lighting, street trees, stormwater management, vertical curvature, and stopping sight distance.

Work History

Cecil & Associates LLC – Bothell, WA (2015-Present)
Position: *Civil Engineer/Principal/Owner*

GoeEngineers – Seattle, WA (2014-2015)
Position: *Civil Engineer (Natural Resources Department)*

Coughlin Porter Lundeen - Seattle, WA (2006-2014)
Position: *Civil Project Engineer*

Education

BS – Civil Engineering: Washington State University (Fall 2001-Spring 2006)
Juneau Douglas High School (1996-2000)

Professional Licenses

Washington State PE #50436 (2012 – Present)
LEED AP (2009 – Present)

Software Experience

- Auto CAD & Civil 3D
- Autoturn (Vehicle Maneuvering Analysis)
- Zoom Meeting Platform
- Microsoft Office (Word, Excel, Teams)
- Outlook Email
- Utilized Various Collaborative Servers such as MS Sharepoint, Drop Box, and Newforma
- PDF Editors such as Blue Beam and Adobe
- Various Hydrographic Modeling Software for Both Continuous Runoff Modeling and Peak Event Models Including Western Washington Hydrology Model (WWHM), MGS Flood, HydroCAD, and King County Runoff Time Sereies (KCRTS
- Conveyance Calculations Using Storm Sewers Extension and MS Excel

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10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700 | F: 425.471.0714

DN TRAFFIC CONSULTANTS, INC.

Transportation Engineers & Planners

PO Box 547, Preston, Washington 98050-0547 · 425-765-5721 · Gary@dntrafficconsultants.com

EVALUATION OF VARIANCES

TENW Traffic Impact Analysis (April 4, 2024) compared with DN Traffic TIA (November 6, 2026)

Prepared for:	**Friends of Deer Meadow, LLC**
Prepared by:	DN Traffic Consultants, Inc. — Gary A. Norris, PE, PTOE, RSP1; RSP2i analysis support by Joshua R. Henriot
Re:	Wildwood Ranch, Cle Elum — SUB-2023-003, DA-2024-001, SEPA-2024-004
Compared:	TENW, "Traffic Impact Analysis of Wildwood Ranch (Updated)," Apr. 4, 2024 (Project 2021-310), relied on by the MDNS of Aug. 14, 2025; and DN Traffic, Draft Traffic Impact Analysis, Oct. 19, 2026
Status:	**Final**
Date:	November 6, 2026

1. Purpose

This memorandum compares the two analyses item by item. For each variance it states what TENW did, what DN Traffic found, and whether the difference changes a conclusion. Significance ratings:

- **High** — the variance changes, or prevents, a conclusion relevant to the threshold determination
- **Medium** — the variance weakens the reliability or completeness of the analysis
- **Low** — the variance is technical and does not change results

2. Where the Analyses Agree

- Both find that the SR 903 stop-controlled approach operates at LOS A–B, within the City's LOS D standard, with and without the project. DN Traffic's calculations reproduces similar findings as the TENW's 2022 Synchro results. The 2041 buildout calculations are not found in the TENW TIA, thus DN Traffic cannot speak to the buildout condition findings.
- Trip generation is essentially the same: 770 vs. 788 daily trips, 53 vs. 56 in the AM peak hour and 70 vs. 73 in the PM peak hour.
- Both identify a need for control and delineation at the Airport Road / Spansky Way junction. TENW recommended it "regardless of the project."

DN Traffic therefore does not contend that the project fails the City's level-of-service test. The variances concern scope, data, distribution, horizon, geometry and safety, which TENW's LOS-based analysis did not address.

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3. Item-by-Item Variances

#	Topic	TENW TIA (Apr. 2024)	DN Traffic (Nov. 2026)	Effect / significance
1	Count data	IDAX counts Tue., Sept. 20, 2022; analyzed unchanged in 2024 and relied on in 2025.	DN manual counts Thu., Oct. 8, 2026, with trucks recorded and photographs at each reading.	**Medium.** Data four years old at hearing; superseded by current counts.
2	Analysis periods	Weekday PM peak only (4:00–6:00). No AM counts nor capacity analyses were done.	AM (6:30–8:30) and PM (4:30–6:30). AM peak 7:15–8:15, 387 veh; PM peak 4:30–5:30, 596 veh.	**Medium.** AM period not analyzed by TENW; the AM has the highest truck share (13%; 17% on westbound SR 903). AM peak hour conditions are critical for residential development.
3	Peak-hour volumes	2022 PM peak (4:00–5:00): 665 entering at SR 903 / Spanski.	2026 PM peak (4:30–5:30): 557 at the same movements (−16%).	**Low.** Volumes did not grow; DN findings do not depend on growth.
4	Study area / intersection model	Three independent stop-controlled intersections along Spanski, each modeled separately in Synchro.	One four-approach cluster: two stops 84 ft apart, a free Airport Rd ↔ Spansky movement, and uncontrolled entries from SR 903.	**High.** Isolated-intersection models cannot show spill-back, the free-movement conflicts, or truck blocking; microsimulation and a conflict study are needed.
5	Horizon year	2028 buildout.	2028 and 2041; the MDNS states the developer requests a 15-year buildout, and Condition 11 requires the TIA be updated.	**High.** TENW's horizon is inconsistent with the proposal as conditioned; 2041 volumes are noticeably estimated to be higher than 2028 levels.
6	Background growth	2% per year, no pipeline projects; section titled "2025 Baseline" but analyzes 2028.	2.5% per year (City Comprehensive Plan, as used in the Oct. 2025 Teanaway Court TIA); pipeline projects still to be identified.	**Medium.** Understates future volumes; internal labeling inconsistency.
7	Trip generation	ITE 11th ed.: LUC 210 (53) + LUC 220 low-rise multifamily (40): 770 daily / 53 AM / 70 PM.	ITE 12th Ed.: LUC 210 (53) + LUC 215 single-family attached (40): 745 daily / 56 AM / 69 PM	**Low.** Difference is negligible for peak-hour trips.
8	Trip distribution	75% SR 903 (50% W / 25% E); 5% Airport Rd; 10% E. 1st W; 10% E. 3rd W. Basis: judgment and prior studies.	Same 20% west on local streets; of the 80% through the cluster, 57% to and from Airport Rd, per observed 2026 Spanski Way patterns.	**High.** Reevaluate the trip distribution percentages with justifications. Update for AM as well.
9	LOS results	All LOS B or better; the 2028 SR 903 southbound approach is reported as LOS B (15.0 s) in Table 4, but the Synchro worksheet shows LOS C.	LOS A–B in all scenarios through 2041 (maximum 14.7 s).	**Low.** Conclusions agree; TENW's table contains a reporting error (B versus C).

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#	Topic	TENW TIA (Apr. 2024)	DN Traffic (Nov. 2026)	Effect / significance
10	Queue storage	Not evaluated.	84 ft stop-to-stop: about 3 cars or one WB-67. The Airport Rd connection lies inside it. A loaded flatbed was observed blocking the cluster.	**High.** Recurring blockage with a 9–17% truck share on SR 903; analysis should be updated to include 95th-percentile queue.
11	Site plan basis	11.4-acre site; plan with no Deer Meadow Drive lot access.	Current application: 11.97 acres, 12 lots with direct Deer Meadow Drive access (MDNS); plat revised Mar. 25, 2025.	**Medium.** TIA does not reflect the project as proposed.
12	E. 3rd St accesses and Deer Meadow Dr	Not analyzed.	Identified as unanalyzed; MDNS Conditions 2–4 require a County permit and an upgrade of Deer Meadow Drive. Existing homes likely will cut through the new development to/from SR 903.	**High.** There are 12 driveways to E 3rd St proposed, and 2 new site access driveways.. Intersection traffic control should be evaluated. In addition, sight distance should be evaluated for Lots 54-65, vehicles likely to be backing out.
13	Spansky culvert section	Measured 19.5 ft paved width (Sept. 2022); adequacy not evaluated.	Measured 18 ft; carries most project trips; adequacy for two-way traffic, trucks, fire apparatus and pedestrians unevaluated.	**Medium.** Width deficiency on the primary access route. TIA should evaluate pedestrian and bicycle safety across culvert section, and recommend widening improvements.
14	Airport Rd / Spanski control	Recommended stop on westbound Airport Rd and channelization “regardless of project”; MDNS requires a 27.5% share.	As of Oct. 8, 2026: no stop for Airport Rd at Spansky; apron still unchannelized; no timing for the improvement.	**High.** TENW’s own recommended safety fix is unbuilt and unscheduled while project traffic on that movement would roughly double. TIA incorrectly models Airport Rd as the stopped approach.
15	Safety / collision history	Stated as included; no collision data or analysis presented.	Collected WSDOT crash data; conducted field observations of conflicts, stop-sign violations, a near-collision and truck blocking conditions.	**High.** Update safety analysis for existing crash records. Add in future crash prediction.
16	Trucks	Heavy-vehicle percentages used in Synchro only (2–10%).	Recorded by movement: 13% AM / 9% PM overall; 17% on westbound SR 903 in the AM; semis circling via the truck stop.	**Medium.** Truck operations at the Airport Rd ‘hook’ to SR 903 should be evaluated (no WB-67 turning check).
17	Sight distance	Not evaluated.	AASHTO guidance at 45 mph is about 500 ft (car) and about 760 ft (combination truck).	**Medium.** Required for a stop-controlled approach to a 45-mph state route.
18	Pedestrians, bicycles and schools	Not addressed (no sidewalks noted only).	No facilities; children and cyclists observed in the uncontrolled area; schools on SR 903 northwest of downtown; bus stops and walk routes unevaluated.	**High.** Student and non-motorized safety absent from the record; the MDNS is silent on schools.

#	Topic	TENW TIA (Apr. 2024)	DN Traffic (Nov. 2026)	Effect / significance
19	Emergency access and evacuation	Not addressed.	No outlet north or east; single clinic in town (weekdays only); hospital in Ellensburg; wildfire-vulnerable corridor.	**Medium.** Secondary access and evacuation unevaluated.
20	E 1st St/Spanski Rd new configuration	Safety concerns not addressed.	The NB approach with new intersection design should include sight distance evaluation. In addition, several proposed lots have driveway access directly opposite the stopped approach.	**High.** Evaluate sight distance for new intersection. Driveway access for Lots 30-33 should be evaluated for safety.
21	Mitigation	27.5% share at Airport/Spanski; stop sign and channelization at the new E. 1st / Spanski leg.	Reconfigure and channelize the cluster before occupancy; access management at the yard frontages; culvert widening and a walkway; school and emergency-access measures; truck staging.	**High.** Proposed mitigation does not address the identified conflicts. The proposed design should be included in the TIA

4. Net Effect on the Conclusions

Correcting the low-significance items (trip generation, growth rate and TENW's reporting error) leaves the capacity conclusion unchanged: the project meets the City's LOS standard. The high-significance variances are of a different kind. Indentified are concerns that the TENW analysis never examined:

- the cluster operating as one system
- the 15-year buildout
- the observed travel pattern, which loads the uncontrolled Airport Road ↔ Spansky movement
- queue storage with trucks at the north leg of the SR 903/Spanski Rd intersection.
- the E. 3rd Street and Deer Meadow Drive access
- pedestrians and school travel
- the design for the not yet built Airport Road control that TENW itself recommended with proportionate share contrubution
- The proposed realignment of the E 1st St/Spanski Rd intersection includes multiple new homes with direct access into the new intersection. This appears to be a safety concern. In addition, there was no sight distance analysis conducted for the proposed intersection, in particular the NBL looking to the east.
- The narrow width on Spanski Rd over the culvert measured to be 18 ft. This should be mitigated to accommodate proper width for two-way heavy vehicles as well as pedestrian amenities both sides.

On the present record, the probable transportation-safety effects of the project cannot be ruled out. They can only be determined by the updated TIA that MDNS Condition 11 already requires, expanded to cover these items, before the threshold determination rather than at Phase 1 civil review.

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5. Open Items Before Issue

- Confirm field-measurement interpretations (stub width, island length, culvert width).
- Update Trip generation for ITE LUC 215 with 12th Edition.
- Obtain crash data, school district bus routes and stops, and pipeline projects.
- Review the current preliminary plat and any post-MDNS revisions.
- Engineer-of-record review and seal.

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Exhibit 4

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PETERSON RUSSELL KELLY LIVENGOOD PLLC
10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700 | F: 425.471.0714

DN TRAFFIC CONSULTANTS, INC.
Transportation Engineers & Planners
PO Box 547, Preston, Washington 98050-0547 · 425-765-5721 · Gary@dntrafficconsultants.com

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TRAFFIC IMPACT ANALYSIS

Wildwood Ranch, Cle Elum — Independent Analysis of the SR 903 / Airport Rd / Spansky Way Access Cluster

Prepared for:	**Friends of Deer Meadow, LLC** 720 Deer Meadow Drive, Cle Elum, WA 98922
Prepared by:	DN Traffic Consultants, Inc. — Gary A. Norris, PE, PTOE, RSP2i (engineer of record); field data and analysis support by Joshua R. Henriot
Re:	Wildwood Ranch — City of Cle Elum File Nos. SUB-2023-003, DA-2024-001, SEPA-2024-004; appeal of the MDNS dated August 14, 2025 (MDNS Addendum October 22, 2026); hearing November 12, 2026
Site:	1317 E. Third Street and abutting parcel, Cle Elum, WA; approx. 11.97 acres; 92 lots (52 detached, 40 common-wall; revised from 93) in six phases; 10-year Development Agreement term (revised from 15)
Data:	DN Traffic manual turning-movement counts, Thursday, October 8, 2026, 6:30–8:30 AM and 4:30–6:30 PM; field measurements, observations and drive-through video the same day; 7-day machine counts (volume and speed), October 14–18, 2026
Status:	**Final.** Expands on the DN Traffic Traffic Impact Analysis dated October 30, 2026.
Date:	November 5, 2026

1. Executive Summary

DN Traffic Consultants, Inc. (DN Traffic) was retained by Friends of Deer Meadow, LLC to evaluate the transportation effects of the proposed Wildwood Ranch development and the adequacy of the applicant's Traffic Impact Analysis (Transportation Engineering NorthWest [TENW], April 4, 2024), on which the City's MDNS relies. DN Traffic collected new AM and PM peak-period turning-movement counts, measured and observed the SR 903 / Airport Road / Spansky Way access cluster, and re-analyzed the project. Principal findings:

- **Capacity is not the controlling issue.** Using 2026 counts, both AM and PM peaks, and buildout horizons of 2028 and 2036, the stop-controlled approach to SR 903 operates at LOS A–B (under 15 seconds of delay) with and without the project, well within the City's LOS D standard. DN Traffic's planning-level HCM calculation reproduces TENW's own Synchro results to within rounding (e.g., 12.3 s, LOS B for 2022), so the two analyses agree on capacity. The calculations are shown in full in Appendix B.
- **The TENW analysis is too narrow for this location.** It relies on PM-only counts from September 2022 at three intersections, models the access cluster as three independent intersections, and uses a 2028 horizon. The City's November 12, 2026 staff report itself states that, because the

Development Agreement now requests a 10-year buildout, "the TIA projections and subsequent mitigation recommendations need to be revised." That revision has not been made.

- **Most project traffic will use the cluster's uncontrolled movements.** In 2026, about 71% of traffic leaving Spansky Way through the cluster continued onto Airport Road, and about 71% of traffic entering Spansky Way came from Airport Road. TENW assigned only 5% of project trips to Airport Road. Applying the observed pattern, PM peak-hour traffic on the free Airport Road ↔ Spansky Way movement roughly doubles with the project, from 39 vehicles per hour today to about 82 in 2028 and about 91 in 2036.
- **The cluster geometry is the safety problem.** About 84 feet separates the Spansky Way stop from the SR 903 stop, enough for about three cars or a single semi-trailer. The Airport Road connection joins between the two stops. Drivers turning off SR 903 enter with no control. During the count, DN Traffic observed a loaded flatbed blocking the whole intersection, drivers running the Spansky stop sign, a near-collision in the uncontrolled area, and children and cyclists crossing it without stopping.
- **Trucks are a meaningful share.** Trucks were 13% of AM peak-hour and 9% of PM peak-hour traffic; on westbound SR 903 in the AM peak they were 17%. Loaded semis were also observed circling through the intersection to and from a nearby truck stop.
- **Required elements were not analyzed.** TENW did not evaluate the two E. 3rd Street accesses, the 12 lots taking direct access to Deer Meadow Drive (which MDNS Condition 3 requires to be upgraded to Kittitas County standards), sight distance, collision history, pedestrian and bicycle facilities, school travel, or emergency access.
- **The site access is not designed.** The preliminary civil plans (Exhibit B-13) contain sewer and water sheets only: no street plan, intersection layout, signing or striping. As drawn, Road A continues straight onto E. 1st Street westbound, Spanski Road becomes a side street, the full street section ends abruptly at a narrow street with no sidewalk, and Phase 1 driveways face the Spanski approach. No control is assigned, so the entrance would operate like the SR 903 cluster: another uncontrolled junction at the edge of town. For the first two phases (2026–30) it is the only way in or out.
- **The north access is a private gravel road.** Both north connections land on Deer Meadow Drive, a gravel road signed "Private Road – Residents Only," beyond public maintenance, at the end of a street the City signs DEAD END. It opens only with Phase 3 (about 2030–32), and the County requires it to be upgraded before it can serve the project.
- **The City staff report confirms several of these points.** The November 12, 2026 staff report concedes that TENW's projections and mitigation must be revised for the 10-year buildout; reports the SR 903 approach at LOS C (15 s), not the LOS B in TENW's table; and records Public Works' finding that the project "will cause increased pedestrian and vehicle traffic without adequate safety precautions for pedestrians." It nevertheless states that the appellants offered no evidence of traffic impacts. This report is that evidence. Section 9 responds to the staff report point by point.

Conclusion. The project does not trigger a capacity deficiency at the City's LOS standard. It does, however, materially increase traffic through an unconventional, partly uncontrolled intersection cluster with a substantial truck share, no pedestrian facilities, and observed conflicts. None of this was evaluated in the analysis on which the MDNS relies. Section 10 lists the analyses and mitigation DN Traffic considers necessary.

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2. Introduction

2.1 Purpose and scope

This report (1) documents existing conditions at the project's principal access route using new data, (2) estimates project traffic and future volumes, (3) evaluates intersection operations and the cluster's uncontrolled conflict area, and (4) identifies elements the applicant's analysis did not address. A separate memorandum compares this analysis with TENW's item by item. Engineering opinions are formed independently from the evidence. Whether the MDNS satisfies SEPA is a legal question for counsel and the Hearing Examiner.

2.2 Project description

Item	Description	Source
Proposal	92 lots (reduced from 93 after the MDNS), mixed single-family detached and common-wall (attached) units, developed in six phases, with a Development Agreement	Staff Report, Nov. 12, 2026, p. 3; MDNS
Unit mix analyzed	52 detached single-family; 40 common-wall (attached). TENW analyzed 53 detached and 40 attached; the revision removes one detached lot.	Development Agreement (Exhibit B-15) § 6
Site	1317 E. Third Street and abutting parcel to the east; approx. 11.97 acres (TENW: 11.4 acres)	MDNS; TENW
Vehicle access	South: Road A begins at the E. 1st Street / Spanski Road corner and runs east along the south boundary as a continuation of E. 1st Street, with Spanski Road meeting it from the south. North: Road A and Road B both connect to the frontage the plat labels Deer Meadow Drive (right-of-way to be dedicated). publicly maintained E. 3rd Street ends at the city limit at the site's northwest corner; east of that point the road along the north boundary is gravel and signed "Private Road – Residents Only." Lots 53–64 (12 common-wall lots) front it. Beyond the site, Deer Meadow Drive is private and dead-ends in both directions at residences; its only outlet is E. 3rd Street.	Plat (B-11); civil plans (B-13); DN aerial review
Phasing	Phase 1, 2026–28 (lots 31–37); Phase 2, 2028–30; Phase 3, 2030–32; Phase 4, 2032–34; Phase 5, 2034–35; Phase 6, 2035–36. Phases 1–2 (about 23 homes) are served only from the south; the north connection comes with Phase 3.	Phasing plan (B-17)
Buildout	TENW assumed 2028. The Development Agreement term is 10 years (DA § 3; reduced from 15); staff states the TIA projections and mitigation "need to be revised" to the Development Agreement buildout period. DN Traffic uses 2036.	DA § 3; Staff Report pp. 3, 9; MDNS Condition 11
Outlets	No through connection north or east; the gravel road on the north edge is a private drive. All site traffic exits west on local streets or south through the SR 903 / Airport Rd / Spansky Way cluster.	DN field review

2.3 Study area and data

The study focuses on the SR 903 / Airport Road / Spansky Way–E. 1st Street cluster, which carries about 80% of project trips under both TENW's and DN Traffic's distributions. DN Traffic counted the cluster as one intersection with four approaches:

- North: Spansky Way / E. 1st Street (southbound into the cluster)
- East: SR 903 westbound
- South: Airport Road (shown as the south leg, consistent with the count board)
- West: SR 903 eastbound

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Counts were taken in 15-minute intervals on Thursday, October 8, 2026, from 6:30 to 8:30 AM and from 4:30 to 6:30 PM, in clear weather. Trucks were tallied as a subset of each movement. Count sheets, peak-hour calculations and charts are provided in the companion workbooks (Wildwood_Cle_Elum_Traffic_Count_Workbook_AM / _PM).

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3. Existing Conditions

3.1 Roadway network

Roadway	Function / control	Posted speed	Cross-section and pedestrian facilities
SR 903	State route; principal arterial; free-flow through the cluster	45 mph	Two lanes plus an eastbound left-turn lane at the cluster; no sidewalks. A freight route serving east-end industrial uses, with truck staging during Snoqualmie Pass closures (WSDOT corridor sketch).
Airport Road	Local / collector; stop sign at SR 903; no stop at Spansky Way	35 mph	Two lanes, about 30 ft paved (TENW). Parallels SR 903 behind a separation island about 170 ft long, then hooks into the stub between the two stop signs.
Spansky Way / E. 1st Street	Local; stop sign about 84 ft north of SR 903	25 mph	Gravel/earth shoulders, no sidewalks. Narrows at a culvert: TENW reports 19.5 ft; DN measured about 18 ft.
E. 3rd Street	Local; signed DEAD END at S. Cottage Avenue; public maintenance ends at the city limit at the site's northwest corner	25 mph	Paved to the city limit; no sidewalks. Not analyzed by TENW.
Deer Meadow Drive	Private gravel road on a 60-ft access easement, beyond public maintenance; signed "Private Road – Residents Only"	—	Continues east along the site's north boundary from the end of E. 3rd Street to cluster mailboxes at its junction with private branches north and south, each dead-ending at residences. Postal delivery stops at the mailboxes. Lots 53–64 front it; Kittitas County requires an upgrade to County standards (D-03).

Street-name note: the street sign in the field reads "Spansky Way"; TENW uses "Spanski Road." This report follows the sign.

3.2 The SR 903 / Airport Road / Spansky Way cluster

The cluster functions as one intersection but is controlled as several. Southbound Spansky Way traffic stops about 84 feet north of SR 903. It can then turn onto Airport Road, or proceed to a second stop sign at the SR 903 edge that it shares with Airport Road traffic. Airport Road traffic has no stop where it meets Spansky Way and stops only at SR 903. Traffic turning off SR 903 has no control at all. That includes eastbound left turns from a protected left-turn lane and westbound right turns, among them a hairpin U-turn movement back east onto Airport Road. These vehicles continue freely onto Airport Road or Spansky Way through an open, unchannelized apron bordered by commercial yards whose frontages are open to the stub.

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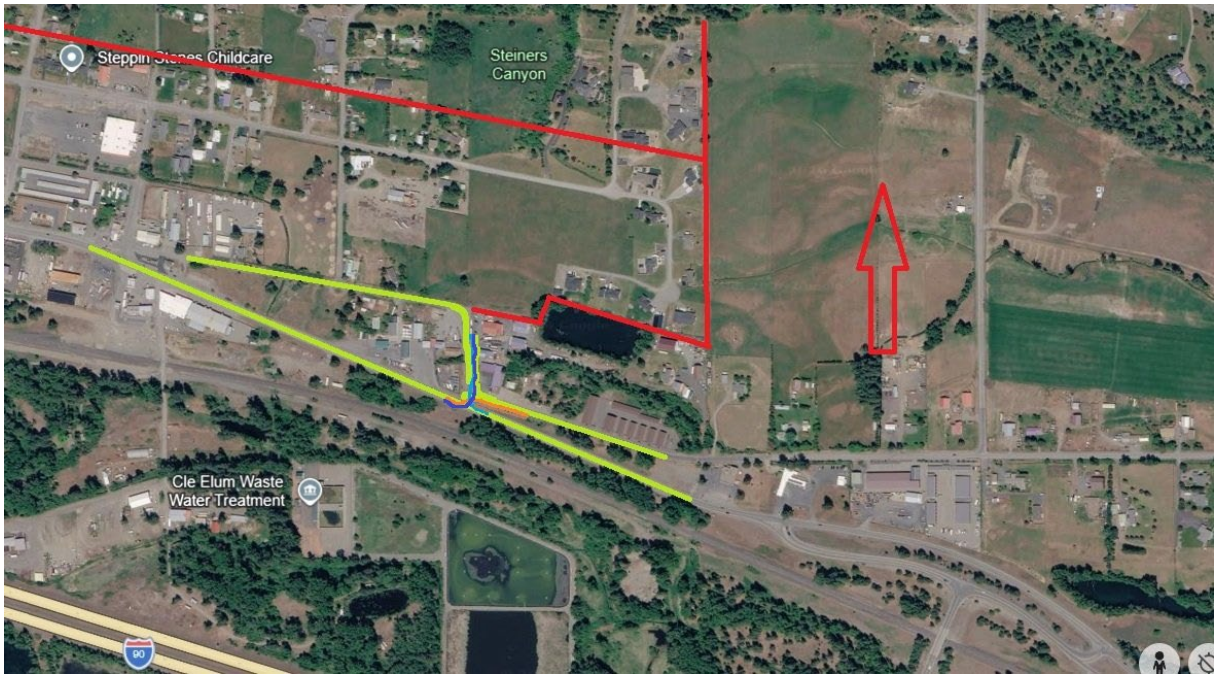


Figure 1. Site and vicinity. Red: site boundary and no-exit edges (north arrow shown). Yellow-green: SR 903, Airport Road and E. 1st Street approaches to the cluster.



Figure 2. The SR 903 / Airport Road / Spansky Way cluster (aerial). Note the open, unchannelized apron and adjoining yard frontages.

Field measurements. Taken by DN Traffic on October 8, 2026. Values are approximate and are recorded on the DN Traffic field sketch.

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Dimension	Measured	Significance
Spansky Way stop to SR 903 stop (stub length)	84 ft	Storage for about 3 passenger cars (25 ft each) or one WB-67 semi (about 74 ft). The Airport Road connection lies within this length.
Stub width at the SR 903 stop line	about 74 ft	Wide, unmarked apron; observed two vehicles abreast at the stop
Airport Road separation island along SR 903	about 170 ft	Airport Road runs alongside SR 903 before hooking into the stub
Opening between the island nose and the stub	about 38 ft	Entry for the Airport Road hairpin and the SR 903 U-turn movement
E. 1st Street / Spansky Way north of the stub	22–23 ft	Local street width
Spansky Way at the culvert	about 18 ft	Below TENW's 19.5 ft; two-way traffic, trucks and any pedestrians share this width

3.3 Existing traffic volumes (October 8, 2026)

Peak hours were determined from rolling hourly totals of all approaches:

Period	Peak hour	Total vehicles	Trucks	Peak-hour factor
AM	7:15–8:15	387	51 (13.2%)	0.91
PM	4:30–5:30	596	52 (8.7%)	0.90

The PM peak hour is the first hour counted. TENW's 2022 PM peak was 4:00–5:00, so the true 2026 PM peak may begin before 4:30. A count beginning at 4:00 is recommended (Section 10).

Table 3-3. Peak-hour turning movements by approach (vehicles; trucks are included in movement totals)

Approach	Movements	AM	AM total	AM trucks	PM	PM total	PM trucks
SR 903 westbound (from east)	*To Airport Rd (U-turn) / through / to Spansky*	7 / 182 / 1	190	32	1 / 230 / 8	239	20
SR 903 eastbound (from west)	*To Airport Rd / through / to Spansky*	13 / 114 / 1	128	16	21 / 257 / 3	281	29
Airport Road (from east)	*To SR 903 E / to Spansky / to SR 903 W*	5 / 15 / 38	58	3	8 / 17 / 21	46	2
Spansky Way (from north)	*To SR 903 W / to Airport Rd / to SR 903 E*	2 / 7 / 2	11	0	4 / 22 / 4	30	1
Intersection total			**387**	**51**		**596**	**52**

Fifteen-minute totals were 54, 87, 64, 106, 93, 85, 103 and 93 vehicles (AM, 6:30–8:30) and 166, 125, 164, 141, 116, 120, 154 and 96 vehicles (PM, 4:30–6:30).

3.4 Comparison with TENW's 2022 count

TENW's September 20, 2022 counts (PM only, 4:00–5:00) were regrouped against DN Traffic's 2026 PM peak hour (4:30–5:30):

TENW location	2022 (TENW)	2026 (DN)	Change
SR 903 / Spanski — total entering	665	557	−16%
SR 903 through (EB + WB)	567	487	−14%
Turns from SR 903 into the stub	52	33	−37%

TENW location	2022 (TENW)	2026 (DN)	Change
Stub to SR 903 (left + right)	46	37	−20%
Airport / Spanski — total entering	131	109	−17%

2026 PM volumes are lower than 2022. Likely contributors are the 30-minute offset in the counted peak, seasonality (late September versus early October), and normal day-to-day variation. Volume growth is therefore not the basis of DN Traffic's findings. The 2026 counts are used because they are current, cover both peaks, record trucks, and capture the movement-level travel pattern through the cluster, which TENW's three-intersection count could not.

3.5 Intersection observations

The following were observed and logged by DN Traffic during the counts. Bicycles, scooters and similar devices were not included in the vehicle counts.

Time	Observation
AM / PM	A loaded flatbed semi queued at the SR 903 stop and blocked the entire intersection.
AM / PM	A pickup swerved wide around a box delivery truck stopped at the SR 903 stop to continue onto Spansky Way / E. 1st Street.
AM / PM	More than one car and several full-size pickups ran the Spansky Way stop sign, continuing to Airport Road or to the SR 903 stop.
AM / PM	Loaded semis traveled west on SR 903 past the cluster, stopped at the truck stop, and returned east through the cluster.
PM	Near-collision: a vehicle turning from Spansky Way to Airport Road conflicted with a vehicle turning from SR 903 onto Airport Road. Neither movement has a stop.
5:10 PM	E-bike, Spansky Way to Airport Road, through the uncontrolled area
5:14 PM	Bicycle, Spansky Way to Airport Road
5:20 PM	Loaded touring cyclist, Spansky Way to Airport Road, in conflict with a hesitant driver going from westbound SR 903 to Airport Road
5:42 PM	Vehicle ran through from Spansky Way to Airport Road without stopping
5:53 PM	Two children on bicycles, Airport Road to Spansky Way
6:06 PM	Small unplated dirt bike, Spansky Way to Airport Road
PM (untimed)	Two children, one on an e-scooter and one on a small motorbike, Spansky Way to Airport Road, with no stop or slowing (possibly the same riders as the 5:10 and 6:06 PM entries)
Outside count hours	One pedestrian walking dogs. No pedestrians were recorded during the count periods.

A long-time resident of E. 1st Street, interviewed during the count (name in DN Traffic field notes), described the established, long-term character of the Spansky / E. 1st / E. 3rd / Cottage Grove neighborhood and concern that a 93-lot development is out of scale with the supporting infrastructure.

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Figure 3. Vehicles at the shared SR 903 stop (October 8, 2026, 4:45 PM). The unmarked apron allows vehicles to stop side by side.



Figure 4. A Google Street View depiction of a truck and trailer blocking northbound movements at the SR 903 stop.

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Figure 5. Spansky Way stop (foreground) set back from the Airport Road / SR 903 stop (background) at dawn, 6:29 AM. Note worn markings and the open apron.

3.6 Pedestrian and bicycle facilities

No sidewalks, marked crossings or bicycle facilities serve the cluster, Spansky Way, E. 1st Street or E. 3rd Street near the site. Pedestrians and cyclists use the travel lanes and gravel shoulders, including the 18–19.5 ft culvert section. Children and cyclists were observed using the uncontrolled Airport Road ↔ Spansky Way movement (Section 3.5).

3.7 Collision history

Not yet obtained. DN Traffic will request WSDOT collision records for SR 903 at the cluster and for Airport Road, Spansky Way / E. 1st Street and E. 3rd Street (minimum ten years, including property-damage-only), together with local police and KITTCOM dispatch logs. TENW's memorandum states that it reviewed historical collisions, but it presents no collision data. Use of WSDOT safety data in the proceeding (23 U.S.C. § 407; RCW 46.52.080) should be reviewed with counsel.

3.8 Schools and student travel (Safe Routes to School)

Cle Elum-Roslyn School District's Walter Strom Middle School and Cle Elum-Roslyn High School share a campus at 2690 SR 903, northwest of downtown and on the opposite side of town from the site. Cle Elum-Roslyn Elementary School is on the same corridor at 2696 SR 903. The district office is at 4244 Bullfrog Road. All three schools are well beyond walking distance of the site.

Students from the site will most likely be bused. The district publishes its bus routes online; the routes and stops that would serve the site were not obtained for this report. Wherever stops are placed, students will walk along E. 1st Street, E. 3rd Street or Spansky Way, which have no sidewalks, and possibly through the cluster. The MDNS and TENW do not mention schools, school buses or walking routes. Children were observed cycling through the uncontrolled area during the PM count. Washington law treats hazardous walking conditions as a student-transportation matter (RCW 28A.160.160; WAC 392-141). DN Traffic recommends obtaining district bus routes and stops and evaluating walking routes from the site to those stops.

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3.9 Emergency services and medical access

The only medical clinic in Cle Elum is KVH Family Medicine – Cle Elum (201 Alpha Way), open weekdays 8 AM–5 PM. Cle Elum has no hospital emergency department. Emergency care is provided by Kittitas Valley Healthcare in Ellensburg (603 S. Chestnut Street), whose emergency department is open 24 hours and is designated a Level IV trauma service. Ambulance transport from the site therefore depends on the same SR 903 / I-90 access as everyday traffic.

The site has no outlet to the north or east. All emergency access and evacuation traffic must use the local streets to the west or the cluster to the south. WSDOT rates the SR 903 corridor moderately vulnerable to climate impacts, primarily wildfire. TENW did not evaluate emergency access, secondary access or evacuation.

3.10 Supplemental 7-day machine counts (October 2026)

Pneumatic-tube counts of volume (both locations) and speed (E. 3rd Street) were collected by Traffic Data Gathering (Lake Stevens, WA) from Wednesday, October 14 through Sunday, October 18, 2026. Days with no recorded data are excluded below.

Location (as labeled by the count firm)	Wed 10/14	Thu 10/15	Fri 10/16	Sat 10/17	Sun 10/18	Weekday average
E. 3rd St east of S. Cottage Ave (EB + WB)	218	235	224	154	111	226
E. 1st St south of Airport Rd (NB + SB)	857	860	1,029	726	527	915

The E. 1st Street summary sheet prints a Mon–Fri average of 549 and a 7-day average of 571 vehicles per day. Both include Monday and Tuesday, when the counter recorded nothing, and so understate volume. The valid weekday average (Wed–Fri) is 915 vehicles per day.

E. 1st Street south of Airport Road. "South of Airport Road" places this counter, as labeled by the count firm, on the stub between the Airport Road connection and SR 903. Its hourly volumes corroborate the October 8 manual count at the cluster: on Thursday, October 15, the counter recorded 43 southbound and 13 northbound vehicles from 7:00 to 8:00 AM and 38 southbound and 49 northbound from 4:00 to 5:00 PM, against 47 out of and 22 into the stub in the manual AM peak hour and 37 out and 33 in during the manual PM peak hour. Daily volume through the stub is about 900 vehicles on weekdays, with the busiest hours at midday, consistent with the adjoining commercial yards. This answers the limitation that the manual count covered a single day.

E. 3rd Street east of Cottage Avenue. E. 3rd Street carries about 226 vehicles per day on weekdays, with peak hours of about 20–25 vehicles. Under either distribution, about 10% of project trips (about 78 per day) use E. 3rd Street west of the site, an increase of roughly one-third over today's volume on a street with no sidewalks. Speeds by direction and day:

Direction	85th-percentile speed (mph)	Mean speed (mph)	Share over 25 mph	Highest recorded
Westbound (Wed–Sun)	26.2–27.1	21.8–22.8	21–31%	40.4 mph
Eastbound (Wed–Sun)	26.1–28.9	22.9–23.9	26–43%	38.2 mph

Most drivers travel near the 25-mph limit, but about one in five to two in five exceed it on a street that will carry project traffic and pedestrians, including children walking to bus stops, with no sidewalk west of the site frontage.

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4. Project Traffic

4.1 Trip generation

Trips were estimated from the ITE Trip Generation Manual, 11th edition, using average rates. DN Traffic uses Land Use Code 215 (single-family attached housing) for the 40 common-wall units, which better describes them than Land Use Code 220 (low-rise multifamily) used by TENW.

Land use	Units	Daily	AM in	AM out	AM total	PM in	PM out	PM total
LUC 210 single-family detached	52	490	9	27	36	31	18	49
LUC 215 single-family attached	40	288	6	13	19	13	10	23
DN Traffic total	**92**	**778**	**15**	**40**	**55**	**44**	**28**	**72**
TENW total (LUC 210 + 220)	93	770	14	39	53	45	25	70

LUC 215 rates used: daily 7.20; AM 0.48 (31% in); PM 0.57 (57% in) per dwelling unit (ITE Trip Generation Manual, 11th ed., average rates). TENW's total is for its 93 units (53 LUC 210 + 40 LUC 220). The two estimates differ by only 2 peak-hour trips; trip generation is not a material variance.

4.2 Trip distribution

TENW distributed project trips 75% to SR 903 (50% west, 25% east), 5% to Airport Road, 10% west on E. 1st Street and 10% west on E. 3rd Street, based on judgment and prior studies. DN Traffic retains TENW's 20% westbound share on the local streets. The remaining 80% that passes through the cluster is split according to the 2026 counts of existing Spansky Way traffic, the neighborhood the project will join (AM and PM peak hours combined):

Through the cluster	TENW	DN Traffic	Basis for DN Traffic share
Outbound to Airport Road	5%	57%	71% of Spansky Way traffic leaving through the cluster went to Airport Road
Outbound to SR 903 west	50%	12%	15% observed
Outbound to SR 903 east	25%	11%	15% observed
Inbound from Airport Road	5%	57%	71% of traffic entering Spansky Way came from Airport Road
Inbound from SR 903 (eastbound left turn)	50%	7%	9% observed
Inbound from SR 903 (westbound right turn)	25%	16%	20% observed
West via E. 1st / E. 3rd (not through cluster)	20%	20%	TENW assumption retained

The observed pattern is plausible: residents heading into town tend to use E. 1st or E. 3rd Street directly, while Airport Road serves as the parallel route east. The existing Spansky Way sample is small, about 11 vehicles in the AM peak and 30 in the PM peak, so DN Traffic treats its distribution as the more realistic scenario and reports both. An origin–destination (license-plate) survey would settle the question.

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5. Future Conditions

Future volumes were developed from the 2026 counts with 2.5% annual background growth, the rate in the City's Comprehensive Plan as applied in the October 2025 Teanaway Court TIA. Two horizons were evaluated:

- **2028** — TENW's assumed buildout, for direct comparison
- **2036** — 10-year buildout under the revised Development Agreement term (Staff Report, pp. 3 and 9). An earlier version of this analysis used 2041 for the former 15-year term; those results were slightly higher and led to the same conclusions.

No specific pipeline developments were identified in the City's record, and none were added. TENW grew 2022 volumes at 2% per year to 2028 and also included no pipeline projects.

Table 5-1. PM peak-hour volumes at the SR 903 stop (stub approach) and in the uncontrolled conflict area

Scenario	SR 903 thru EB / WB	Into stub EBL / WBR	Stub out L / R	Airport ↔ Spansky (no stop)	From SR 903 into cluster (no control)
2026 existing	**257 / 230**	**24 / 9**	**12 / 25**	**39**	**33**
2028 without project	270 / 242	25 / 9	12 / 26	41	34
2028 + project (TENW dist.)	270 / 242	47 / 20	19 / 40	45	67
2028 + project (DN dist.)	270 / 242	28 / 16	15 / 30	82	44
2036 without project	329 / 294	31 / 11	15 / 32	50	42
2036 + project (TENW dist.)	329 / 294	53 / 22	22 / 46	54	75
2036 + project (DN dist.)	329 / 294	34 / 18	18 / 35	91	52

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6. Intersection Operations

The SR 903 stop was analyzed with the HCM 7th edition two-way stop-control method as a T-intersection: SR 903 is the free major street, and the stub (combined Airport Road and Spansky Way traffic) is a single shared-lane stop-controlled approach. Inputs are the observed peak-hour factors and truck percentages by approach. As a check, the calculation reproduces TENW's 2022 Synchro result for the same intersection: capacity 556 versus TENW's 555 vehicles per hour, delay 12.3 seconds and LOS B in both. Every step, the check against all three of TENW's Synchro runs, and the inputs for each scenario are shown in Appendix B.

Peak	Scenario	Stub approach delay / LOS	v/c	95th % queue (veh)	SR 903 EB left delay / LOS
AM	2026 existing	9.9 s / A	0.06	0.2	7.8 s / A
AM	2028 without project	9.9 s / A	0.07	0.2	7.8 s / A
AM	2028 + project (TENW dist.)	10.4 s / B	0.11	0.4	7.9 s / A
AM	2028 + project (DN dist.)	10.1 s / B	0.08	0.3	7.8 s / A
AM	2036 without project	10.4 s / B	0.09	0.3	8.0 s / A
AM	2036 + project (TENW dist.)	11.0 s / B	0.14	0.5	8.0 s / A
AM	2036 + project (DN dist.)	10.6 s / B	0.11	0.3	8.0 s / A
PM	2026 existing	11.1 s / B	0.07	0.2	7.9 s / A
PM	2028 without project	11.3 s / B	0.07	0.2	8.0 s / A
PM	2028 + project (TENW dist.)	12.0 s / B	0.11	0.4	8.1 s / A
PM	2028 + project (DN dist.)	11.5 s / B	0.08	0.3	8.0 s / A
PM	2036 without project	12.4 s / B	0.10	0.3	8.2 s / A
PM	2036 + project (TENW dist.)	13.3 s / B	0.15	0.5	8.3 s / A
PM	2036 + project (DN dist.)	12.8 s / B	0.11	0.4	8.2 s / A

Findings. All scenarios operate at LOS A–B, within the City's LOS D standard. The project adds less than 1.5 seconds of delay at the SR 903 stop. TENW's distribution, which sends more project traffic to SR 903, gives slightly higher delay than DN Traffic's, but neither approaches a deficiency.

6.1 Queue storage

The calculated 95th-percentile queue at the SR 903 stop is below one vehicle in every scenario. Averages, however, do not describe this location. The 84 ft between the two stops holds about three passenger cars or one semi-trailer, and the Airport Road connection lies within it. A single truck waiting at SR 903 therefore blocks both the Airport Road connection and the Spansky Way approach, which is what DN Traffic observed. With trucks making up 4% of stub traffic and 9–17% of SR 903 traffic, these events are recurring.

6.2 Limits of the stop-control method here

The HCM method treats each stop as an isolated intersection. It cannot represent the cluster's interactions:

- a stop 84 ft upstream of another stop, with a free-flowing connection between them
- uncontrolled entries from SR 903 crossing that free-flowing movement
- queue spill-back from a stopped truck

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- side-by-side stopping on the unmarked apron
- access to the open yard frontages

TENW's three separate Synchro intersections share the same limitation. A microsimulation of the cluster (e.g., SimTraffic) and a field traffic-conflict study are needed to evaluate it properly.

7. Uncontrolled Conflict Area

Three movement groups meet in the cluster with no control:

- the free Airport Road ↔ Spansky Way through movement
- eastbound left turns from SR 903, which enter from a 45-mph highway
- westbound right turns from SR 903, including the hairpin onto Airport Road

In the 2026 PM peak hour, 39 vehicles made the Airport Road ↔ Spansky Way movement, and 33 entered from SR 903 with no control. Under DN Traffic's distribution, the Airport Road ↔ Spansky Way volume rises to about 82 vehicles per hour in 2028 and about 91 in 2036, more than double today's. Under TENW's distribution, the added trips shift instead to uncontrolled turns from SR 903 into Spansky Way: 11 vehicles per hour today, about 44 in 2028 and about 47 in 2036. Either way, project traffic substantially increases the vehicles moving through an area where nobody is required to stop, and where conflicts, stop-sign violations and unprotected children and cyclists were already observed at today's volumes.

Sensitivity to the north connection. Once Road A reaches E. 3rd Street (Phase 3, about 2030–32), some trips from the northern lots will leave that way instead of through the cluster. If 40% of all project trips use E. 3rd and E. 1st Streets westbound (instead of 20%), the 2036 PM Airport Road ↔ Spansky Way volume is about 81 vehicles per hour; at 50%, about 75. Both remain roughly double today's 39. Through 2030 all project traffic uses the south access.

TENW identified part of this problem. It recommended stop control on the westbound Airport Road approach, and delineation between the roadway and the adjacent commercial lot, "regardless of the project." As of October 8, 2026, Airport Road traffic still had no stop at Spansky Way, and the apron remained unchannelized. The MDNS requires only a proportionate share of that improvement (Condition 11), with no timing.

8. Site Access and Elements Not Yet Analyzed

8.1 Site access as designed (preliminary plans, received March 11, 2026)

DN Traffic reviewed the preliminary plat (Exhibit B-11, six sheets), the preliminary civil plans (Exhibit B-13, nine sheets) and the phasing plan (Exhibit B-17).

- **No street design.** The civil plans consist of a cover sheet, existing conditions, on-site and off-site sewer, and water. There is no street plan or profile, intersection layout, curb-return detail, signing and striping plan, or sight-distance triangle. The only roadway information is a typical section: 58-ft right-of-way with two 10-ft lanes, 6-ft parking and 6-ft sidewalks on both sides.
- **The E. 1st Street / Spanski Road / Road A intersection.** Today Spanski Road bends into E. 1st Street at the site's southwest corner. The plans extend E. 1st Street east as Road A, so the through movement runs between the site and E. 1st Street westbound, and Spanski Road becomes a side street meeting Road A from the south at about station 2+40. The plans do not dimension the angle at which Spanski Road meets Road A. Measured from aerial imagery, the existing E. 1st Street alignment that Road A continues meets the north–south leg at about 80

degrees, roughly 10 degrees from perpendicular; the plat bearings of the south boundary (N79°11′44″W) and of the west line at Spanski Way (N01°18′16″E) give the same result. That is within AASHTO's tolerance for intersecting roads but does not meet CEMC 16.12A.060(C)(6), which requires 90 degrees, and the staff report states only that the applicant "is proposing to meet this condition." The curb lines drawn at the junction are asymmetric, with a wide flared return on the east side only. TENW's northbound stop on Spanski Road would require existing Spanski Road traffic, which now turns freely onto E. 1st Street, to stop. No stop sign, stop bar or channelization is drawn.

- **Abrupt end of the street section.** At station 0+00, at the west edge of Lot 37, the full 58-ft section with curb, parking and sidewalks ends and meets existing E. 1st Street, which DN Traffic measured at about 22–23 ft with no curb or sidewalk. No transition, taper or pedestrian connection is shown. Pedestrians leaving the site are placed onto the roadway at the point where three traffic streams meet.
- **Driveways at the intersection.** Phase 1 lots 31–37 and lots 27–30 front this segment of Road A, on lots roughly 35–40 ft wide. Lot 31 lies directly opposite the Spanski Road approach, with Lots 30 and 32 beside it, so northbound Spanski Road drivers face residential driveways, in effect a fourth leg.
- **Overhead power.** An overhead electric line runs along the south side of Road A through the intersection. Pole locations relative to the intersection sight triangles have not been checked.
- **More traffic west on E. 1st Street.** Because the design makes E. 1st Street westbound the free, continuous route out of the site, the share using E. 1st Street west of Spanski Road is likely to exceed TENW's 10%. That segment, an older residential street without sidewalks, has not been counted or analyzed.
- **Single access through 2030.** Road A reaches the north boundary only through Phase 3. Phases 1 and 2 (2026–30, about 23 homes) depend entirely on the southwest intersection, including for emergency access. Condition 21 requires a secondary emergency access before 30 units, which coincides with Phase 3.
- **North connections.** Road A (station 11+32) and Road B (station 106+67) both end at the north frontage the plat labels Deer Meadow Drive. Today that frontage is a private gravel road beyond public maintenance, signed "Private Road – Residents Only" (Figure 6). It is not publicly maintained, and the plans include no design for upgrading it. Traffic using the north connections must cross it to reach the paved, publicly maintained end of E. 3rd Street and continue west (Section 3.10: about 226 vehicles per day, no sidewalks, 21–43% of drivers over 25 mph). Kittitas County requires an access permit and an upgrade of Deer Meadow Drive to its standard for a road serving 31 or more lots (Exhibit D-03). The private Deer Meadow branches beyond the site dead-end in both directions and are not a through route for anyone.
- **Inconsistent documents.** The plat labels the north frontage "Right of Way (to be dedicated)," while the civil plans label the same strip "Lot 96, 24,378 SF"; the 92-lot plat has no Lot 96, and the civil plans show a "Lot ???" beside Lot 81. The City (Exhibit E-06, May 21, 2025) told the applicant that the TIA "is for eighty-eight (88) units" and that its Figure 2 "should be updated to match the preliminary site plan as proposed"; Kittitas County (Exhibit D-03) likewise noted that the TIA site plan shows "approximately 90 new parcels." The TIA in the record (Exhibit B-09) was not revised.
- **Off-site sewer in the access route.** About 1,300 ft of new sewer main is to be built down Spanski Road and along Airport Road to the City lift station (sheets C3.0–C3.1), through the cluster. No construction traffic-control plan is included.

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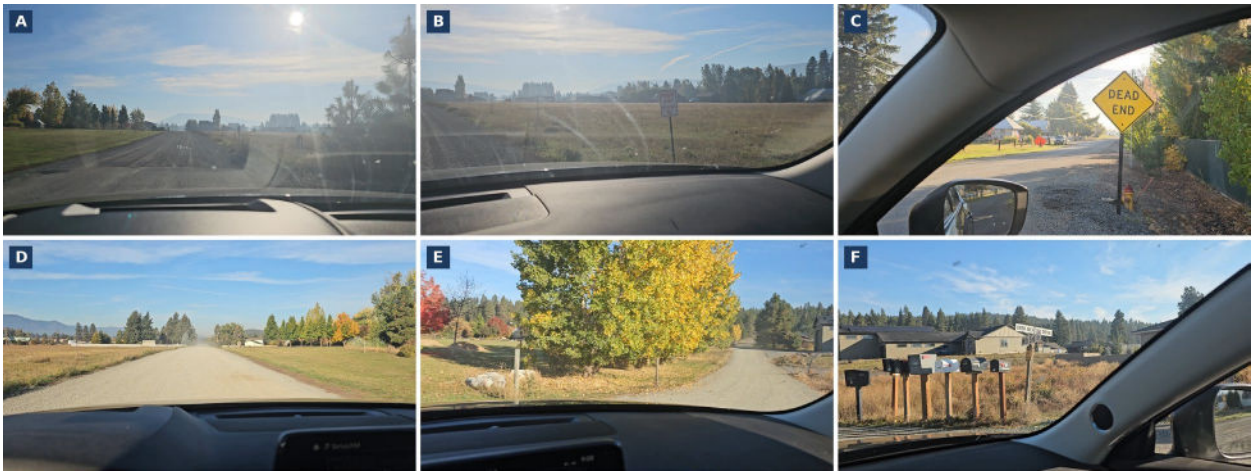


Figure 6. The north access route, from DN Traffic drive-through video, October 8, 2026. A: where the publicly maintained road ends at the site's northwest corner and the road becomes gravel. B: "Private Road – Residents Only" sign at the northwest corner. C: DEAD END sign at S. Cottage Avenue and E. 3rd Street, facing north on Cottage before the turn east onto E. 3rd. D: the gravel road along the site's north boundary, looking west from the mailbox turnaround. E: the private branch north from the turnaround (also signed Deer Meadow Drive). F: cluster mailboxes and street signs at the turnaround, where postal delivery stops.

8.2 The E. 1st Street exit: another uncontrolled junction at the urban edge

As drawn, the site's first and, until about 2030, only exit repeats the conditions that make the SR 903 cluster a concern: free-flowing movements with no assigned right-of-way, a skewed and loosely defined paved area, commercial and residential driveways at the junction, and no pedestrian facilities, at the point where a new urban street meets an older rural one.

- **No control is assigned.** The plans show no stop sign, yield sign, stop bar or striping. TENW's recommended northbound stop on Spanski Road is not drawn, is not in the Development Agreement, and was not found among the recommended conditions of approval. Without signs, right-of-way at the junction defaults to the basic rule for uncontrolled intersections (RCW 46.61.180: the driver on the left yields to the driver on the right), which gives no clear priority to either the existing flow or the new site traffic.
- **A free-flowing bend becomes a three-way junction.** Today Spanski Road and E. 1st Street meet in a continuous bend that drivers take without stopping. Adding Road A as a straight eastward extension of E. 1st Street turns the existing flow into a turning movement and creates a new conflict point on the outside of the bend.
- **A skewed, loosely defined paved area.** The legs meet at about 80 degrees (Figure 8), with a wide flared return on the east side only. A wide, unmarked paved area invites drivers to cut the corner, as they do on the apron at the SR 903 cluster.
- **Urban street meets rural road.** The new 58-ft section with curb, parking and sidewalks ends at the junction and meets a 22–23 ft street with gravel shoulders, no curb and no sidewalk. Pedestrians from 92 homes, including children heading toward the cluster or to school-bus stops, are placed onto the roadway at the junction.
- **Driveways and poles.** Lot 31 sits directly opposite the Spanski Road approach, and Phase 1 driveways line the south segment of Road A at 35–40 ft spacing. An overhead power line runs along the south side through the junction; pole locations relative to sight lines have not been checked.
- **Two undesigned junctions about 400 ft apart.** From this junction, Spanski Road runs about 400 ft south (sheet C3.0 sewer alignment), through the 18–19.5 ft culvert section, to the SR 903 / Airport Road / Spansky Way cluster. Project traffic heading south passes through both.

Volumes here are modest: about 22 PM peak-hour project trips during Phases 1–2 and roughly 45–60 at buildout, added to existing Spanski Road traffic of about 60 vehicles per hour in the PM peak. Capacity is not the issue. The issue is that right-of-way, geometry and pedestrian space are left undefined at the project's main entrance.

Needed. A designed intersection, required as part of preliminary plat approval rather than deferred: alignment at 90 degrees as the City code requires; assigned control (at minimum TENW's northbound stop on Spanski Road, with evaluation of making the existing Spanski Road–E. 1st Street flow the through movement and stopping Road A instead); curb returns sized for fire apparatus and school buses; a continuous sidewalk and marked crossing tying the site to Spanski Road and E. 1st Street; no driveway within the intersection's functional area; and sight triangles clear of poles and plantings.

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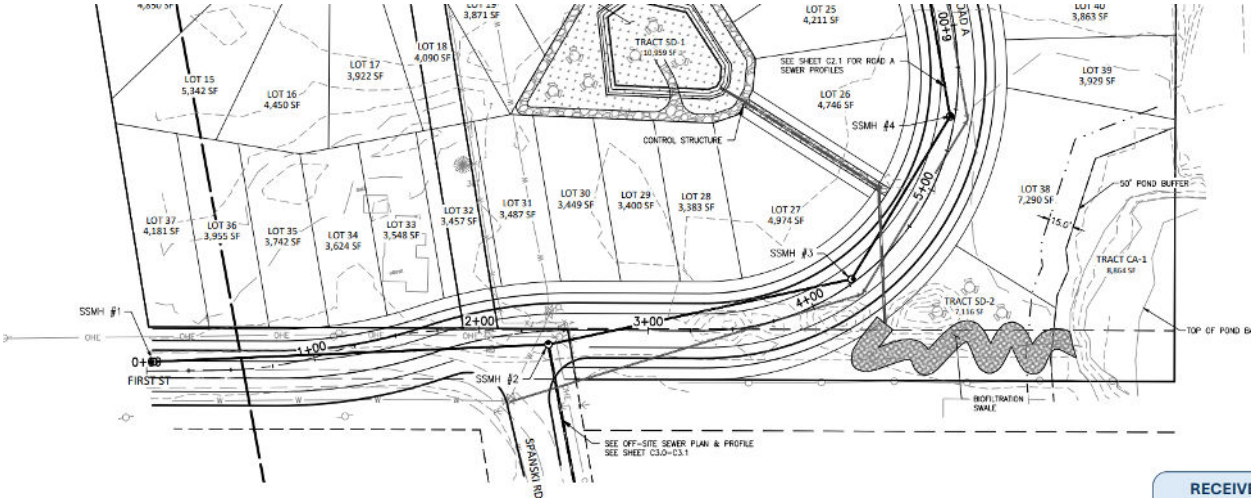


Figure 7. Excerpt, preliminary civil plans sheet C2.0 (Exhibit B-13): Road A along the south boundary continuing west as First St (left), with Spanski Rd meeting it from the south opposite Lot 31. No control devices, curb-return details or sidewalk connection are shown.



Figure 8. Aerial with alignment lines added by DN Traffic. The E. 1st Street alignment that Road A continues (upper line) meets the north–south leg (labeled E 1st St by the map service; Spansky/Spanski on the street sign and plans) at about 80 degrees. The lower line marks SR 903. The plat bearings of the south boundary (N79°11′44″W) and the west line at Spansky Way (N01°18′16″E) give the same angle.

8.3 Other elements not yet analyzed

- **E. 3rd Street.** TENW did not analyze the E. 3rd Street corridor. The October 2026 machine counts (Section 3.10) now give existing volume and speed; intersection sight distance at the north connections and pedestrian routes on E. 3rd Street still need evaluation.

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- **Deer Meadow Drive frontage.** Lots 53–64 front the north frontage directly. MDNS Conditions 2–4 require a County access permit, an upgrade to Kittitas County standards and possibly a grading permit, but no analysis of traffic, width, sight distance or effects on existing Deer Meadow residents, whose only outlet is the same frontage, was provided.
- **Sight distance.** Intersection sight distance at the SR 903 stop (45 mph) and at the new accesses has not been measured. For a stopped vehicle turning left onto a 45-mph road, AASHTO guidance is about 500 ft for a passenger car and about 760 ft for a combination truck.
- **Spansky Way culvert section.** At 18–19.5 ft, the section carries most project trips under either distribution. Its adequacy for two-way traffic, trucks, fire apparatus and pedestrians has not been evaluated.
- **Truck turning.** Design-vehicle turning paths (WB-67) for the hairpin and the stub have not been checked.
- **Construction traffic.** Six phases over as long as 10 years will add construction trucks to the same cluster.

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9. Response to the City Staff Report

The City's staff report for the November 12, 2026 hearing (Exhibit A-01; Findings of Fact, Conclusions and Recommendation, SUB-2023-003, DA-2024-001, SEPA-2024-004) recommends approval of the preliminary plat and Development Agreement and denial of the SEPA appeal. Its transportation findings rely on the TENW TIA. The table responds, from a traffic-engineering standpoint, to each staff statement that bears on transportation. Page numbers refer to the staff report.

Staff report statement	DN Traffic response
No evidence (p. 15). Appellants "do not explain how the project is likely to cause such impacts or explain why they would be significant, let alone provide evidence supporting these claims."	This report provides that evidence for transportation: AM and PM turning-movement counts with trucks, 7-day machine counts, field measurements, logged conflicts and stop-sign violations, and a re-analysis using current data (Sections 3–7).
Outdated horizon (p. 9). The Development Agreement requests a 10-year buildout but the TIA anticipates buildout by 2028; "the TIA projections and subsequent mitigation recommendations need to be revised."	Agreed. The revision has not been made. The October 22, 2026 SEPA Addendum left the MDNS unchanged, and staff recommends approval on the 2028 analysis. The 27.5% cost share is also computed from 2028 volumes. DN Traffic has analyzed 2036 (Sections 5–7).
LOS (p. 10). The SR 903 / Spansky southbound approach operates at LOS C with 15 seconds of delay in 2028.	Agreed, and this corrects TENW's Table 4, which reports LOS B (Appendix B). With 2026 counts the approach operates at LOS B through 2036. DN Traffic does not contend that capacity is deficient; the issue is the cluster's geometry and uncontrolled movements, which LOS does not measure.
Distribution (p. 10). 75% of trips use SR 903; 5% use Airport Road.	Existing Spansky Way traffic uses Airport Road for about 71% of trips through the cluster (Section 4.2). Applying that pattern, most project trips use the uncontrolled Airport Road ↔ Spansky Way movement, not SR 903.
Mitigation (p. 10). Stop control on westbound Airport Road at Spansky, signage and channelization to separate the commercial parking area, with a proportional-share contribution.	TENW recommended these "regardless of the project." As of October 8, 2026 none was in place, and a share payment has no installation date. DN Traffic did not find the measures among the 27 recommended conditions of approval (pp. 49–53); how MDNS conditions carry into the plat is a question for counsel. The Development Agreement (Exhibit B-15) does not mention them either: it contains no traffic provision of any kind (no Airport Road stop, channelization, cost share, secondary access or off-site sidewalk) and sets no timing for MDNS mitigation (§ 8.6). Section 10.3 recommends installation before first occupancy.
Pedestrians (p. 4). Public Works: the project "will cause increased pedestrian and vehicle traffic without adequate safety precautions for pedestrians."	Agreed. The required improvements stop at the site frontage on E. 1st and E. 3rd Streets. Nothing is required between the site and SR 903: the Spansky Way culvert section (18–19.5 ft, no shoulder walkway) or the cluster, where children and cyclists were observed crossing without control.
Schools (p. 30, criterion F). The plat must provide "safe walking conditions for those students who will only walk to school."	The staff response to criterion F does not mention schools, bus stops or walking routes. No school-travel assessment is in the record (Section 3.8).
Secondary access (pp. 33–34, 19; Condition 21). "Secondary access is provided. Access to the site is proposed on Deer Meadow Drive and Spansky Way." **RECEIVED** By Virgil Amick at 7:26 am, November 9, 2026	The north connection is not yet built, and it leads onto Deer Meadow Drive: a private gravel road beyond public maintenance, signed "Private Road – Residents Only," which the same report finds "is not improved" (p. 34) and the County says must be upgraded (D-03). Only past it does traffic reach publicly maintained E. 3rd Street. It opens only with Phase 3 (about 2030–32); Phases 1–2 rely on the single southwest intersection. Condition 21 leaves the emergency access's location to be determined. Code requires two interconnected routes for 40 or more lots (CEMC 16.12A.060(A)(12)). Neither route's traffic, width or emergency use has been analyzed (Section 8.1).

Staff report statement	DN Traffic response
Intersection angle (p. 34). On the code's 90-degree requirement: "Applicant is proposing to meet this condition."	No intersection is designed. The civil plans have no street sheets; the angle is not dimensioned (DN Traffic measures about 80 degrees), Road A's full section ends abruptly at the narrow existing E. 1st Street, and a lot driveway faces the Spanski approach (Section 8.1).
Emergency vehicles (p. 30, criteria G and I). Reduced lot widths present "difficulties for … emergency vehicle travel"; the plat "does not demonstrate conformance with established design requirements."	Consistent with DN Traffic's finding that emergency and evacuation access has not been evaluated (Section 3.9). The only outlets are the local streets to the west and the cluster.
Level of service (p. 31, criterion J). LOS will be maintained through long-range planning, development revenue and the City's "ability to require off-site improvements … if necessary."	This is not a traffic analysis. No off-site improvement at the cluster is identified, scheduled or conditioned. And once the Development Agreement is approved, that ability is limited: § 7.3 provides that "the City shall not modify or impose new or additional Conditions of Approval on Wildwood Ranch" during the 10-year term. Traffic mitigation not identified now may not be obtainable later. The legal effect of § 7.3 is a question for counsel.
Existing regulations (p. 15; WAC 197-11-158). The City may rely on existing plans and regulations to mitigate impacts.	From an engineering standpoint, DN Traffic is not aware of any adopted City standard or plan that assigns control or channelization at the cluster, addresses truck queuing in the 84-ft stub, or provides a walking route from the site to SR 903. Whether this defeats reliance on WAC 197-11-158 is a legal question for counsel.

Summary. The staff report agrees with DN Traffic on the outdated horizon, the LOS C result and the pedestrian deficiency, and its own findings leave secondary and emergency access unresolved. The Development Agreement that would govern the project for ten years contains no transportation provisions and bars new conditions of approval (§ 7.3). Where the staff report and DN Traffic differ, the difference is the evidence: the staff report relies on 2022 PM-only data and TENW's assumed distribution, while this report relies on 2026 AM and PM counts, machine counts and field observation. Traffic was also the most frequent topic of public comment (17 of 29 written comments, pp. 12–13).

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10. Findings and Recommendations

10.1 Findings

- Capacity: LOS A–B in all scenarios; the project does not create an LOS deficiency at the City's LOS D standard.
- The analysis relied on by the MDNS rests on 2022, PM-only data at three intersections, a 2028 horizon that the City staff report concedes must be revised for the 10-year buildout, and a distribution that assigns 5% of trips to Airport Road where existing neighborhood traffic uses it for about 71%.
- Project traffic roughly doubles the volume on the uncontrolled Airport Road ↔ Spansky Way movement by 2028, and raises it to more than double today's by 2036. That movement sits within a cluster with an 84-ft stop-to-stop stub, uncontrolled entries from a 45-mph state route, a 9–17% truck share, no pedestrian facilities, and observed conflicts and stop-sign violations.
- The site's own access is undesigned: the preliminary civil plans contain no street sheets, and the E. 1st Street / Spanski Road / Road A intersection as drawn ends the full street section abruptly at a narrow street, and places driveways opposite the Spanski approach. It is the only access for Phases 1–2 (2026–30), and no traffic control is assigned.
- The north connections lead onto a private, unmaintained gravel road at the end of a street signed DEAD END; they open only with Phase 3 and depend on a County-required upgrade that is not designed.
- The E. 3rd Street accesses, Deer Meadow Drive, sight distance, collision history, school travel, emergency and evacuation access, and truck turning have not been analyzed.

10.2 Recommended analyses before any threshold determination

- An updated TIA (as MDNS Condition 11 already requires) with current AM and PM counts beginning at 4:00 PM, a peak-season adjustment, a horizon matching the Development Agreement buildout, identified pipeline development, and the E. 3rd Street accesses and Deer Meadow Drive in the study area.
- Microsimulation of the SR 903 / Airport Road / Spansky Way cluster as one system, including truck queuing and spill-back.
- A field traffic-conflict study, plus WSDOT and local collision history (minimum ten years).
- Intersection sight distance measurements at the SR 903 stop and the new accesses.
- A street and intersection design for E. 1st Street / Spanski Road / Road A (angle, curb returns, control, sidewalk connection and driveway placement), and a count of E. 1st Street west of Spanski Road.
- A determination of the legal and physical status of the north frontage (private road, County jurisdiction, maintenance, upgrade design) before it is relied on as secondary or emergency access.
- WB-67 turning templates for the hairpin and the stub; a width assessment of the Spansky Way culvert section.
- A school-travel assessment based on district bus routes, stops and walk-zone policy; and an emergency-access and evacuation assessment.

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10.3 Mitigation for consideration

- Reconfigure and channelize the cluster so every conflicting movement is assigned control, at minimum a stop or yield for Airport Road at Spansky Way, as TENW itself recommended. Install the improvement before the first phase is occupied rather than as a cost share.
- Define the yard frontages along the stub with curbing or delineation (access management), and remark stop bars.
- Widen the Spansky Way culvert section and provide a pedestrian walkway or sidewalk from the site to the cluster and to school-bus stops.
- Evaluate a second outlet, or improvements to the westbound local-street route, for emergency access and evacuation.
- Address truck staging and circulation at the cluster with WSDOT and the City.

11. Assumptions, Limitations and Open Items

- One weekday count per peak period; volumes vary by day and season.
- LOS results are planning-level HCM calculations, validated against TENW's Synchro output; final results should be confirmed in Synchro/SimTraffic.
- Field measurements are approximate. District bus routes and stops serving the site were not obtained.
- Collision data and pipeline projects have not been obtained. The City staff report (A-01), Development Agreement (B-15), preliminary plat (B-11), civil plans (B-13), phasing plan (B-17), County comment (D-03) and City review letters (E-04 to E-06) have been reviewed. The text of the October 22, 2026 MDNS Addendum is not posted separately on the City's exhibit list (the hearing notice, Exhibit C-05, refers to it but does not include its findings);
- Opinions may be supplemented or revised as additional information becomes available.

Respectfully submitted,
DN Traffic Consultants, Inc.

Gary Norris 11/06/2026

Gary A. Norris, PE, PTOE, RSP2i — Principal / Engineer of Record Date



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A. Appendix — Data Sources and Supporting Files

Item	Description
Count workbooks	Wildwood_Cle_Elum_Traffic_Count_Workbook_AM.xlsx and _PM.xlsx: DN Traffic field forms, peak-hour calculation forms and rolling-hour charts (October 8, 2026)
Count tabulation	Wildwood_Ranch_TMC_2026-10-08.xlsx: cumulative counter readings, 15-minute volumes, peak hours and 2022 comparison
Field video	Drive-through video of E. 3rd Street and Deer Meadow Drive, October 8, 2026 (J. Henriot); frames reproduced in Figure 6
Count photographs	Counter-board photographs at each 15-minute reading, time-stamped 6:44 AM to 6:30 PM, October 8, 2026
Field measurements	Handwritten field sketch with measurements, October 8, 2026 (J. Henriot)
Applicant TIA	TENW, “Traffic Impact Analysis of Wildwood Ranch (Updated),” April 4, 2024 (TENW Project No. 2021-310), with 2022 IDAX counts and Synchro worksheets. This is the City’s Exhibit B-09, the only traffic study in the record.
City record	MDNS dated August 14, 2025 (SEPA-2024-004); Notice of Appeal, Friends of Deer Meadow, LLC, August 29, 2025; Notice of Public Hearing and SEPA Addendum, October 22, 2026 (Exhibit C-05); Development Agreement (Exhibit B-15; 10-year term, 92 lots); City of Cle Elum Staff Report (Exhibit A-01), Findings of Fact, Conclusions and Recommendation for the November 12, 2026 hearing
Applicant plans	Preliminary plat, six sheets (B-11); preliminary civil plans, nine sheets (B-13); phasing plan (B-17); all received by the City March 11 / June 11, 2026. County Public Works memorandum, Dec. 11, 2024 (D-03); City letters of Jan. 17, Apr. 16 and May 21, 2025 (E-04 to E-06)
Machine counts	Traffic Data Gathering (Lake Stevens, WA): 7-day volume, E. 3rd St e/o S. Cottage Ave and E. 1st St s/o Airport Rd; daily speed, E. 3rd St e/o S. Cottage Ave; October 14–18, 2026
Other references	ITE Trip Generation Manual, 11th ed.; Highway Capacity Manual, 7th ed.; AASHTO Green Book; WSDOT Corridor Sketch CSS368 (SR 903, SR 970 Jct to Bullfrog Rd); Teanaway Court TIA (Oct. 2025); Cle Elum-Roslyn School District and Kittitas Valley Healthcare websites (school and emergency-department information)

Planning-level HCM inputs. Critical headways and follow-up times per HCM 7th ed. for a two-lane major street at a T-intersection, adjusted for observed heavy-vehicle percentages. Peak-hour factor: AM 0.91, PM 0.90 (whole intersection). Analysis period 0.25 h.

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Figure A-1. Open commercial frontage adjoining the cluster (October 8, 2026, 8:43 AM)

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B. Addendum — Showing the Work: SR 903 Stop-Control Capacity Calculations

B.1 What was calculated, and how

This addendum documents the level-of-service (LOS) calculations behind the capacity statements in this document, so that each number can be checked independently. The calculations follow the Highway Capacity Manual (HCM), 7th edition, Chapter 20, two-way stop-controlled (TWSC) intersections. They were performed by DN Traffic as a planning-level calculation in a spreadsheet, not in Synchro. Every formula is reproduced in the companion workbook (Wildwood_TWSC_Capacity_Calculations_2026-10-30.xlsx), where all inputs can be changed and the results recalculate. They have not been rerun in Synchro/SimTraffic; doing so is recommended as part of the updated TIA.

Intersection modeled. SR 903 at the stop-controlled stub (STOP A). SR 903 is the free-flowing major street. Airport Road and Spansky Way traffic arriving at STOP A are combined into a single shared-lane minor approach with two movements: a left turn onto eastbound SR 903 and a right turn onto westbound SR 903. The eastbound left turn from SR 903 into the stub is the major-street left turn. This is the same configuration TENW modeled.

What this does not model. STOP B, the uncontrolled Airport Road ↔ Spansky Way movement, queue interaction between the two stops, and truck blocking. The HCM TWSC method cannot represent those (see Section 6.2 of the TIA); microsimulation is recommended for them.

B.2 Equations used (HCM 7th ed., Chapter 20)

- **Flow rates.** v = hourly volume ÷ peak-hour factor (PHF), for each movement.
- **Conflicting flows.** Major left (EB left, movement 1): vc,1 = v5 + v6 (WB through + WB right). Minor right (stub right to WB, movement 9): vc,9 = v5 + 0.5 · v6. Minor left (stub left to EB, movement 7): vc,7 = 2 · v1 + v2 + v5 + 0.5 · v6.
- **Critical headway tc and follow-up headway tf.** Base values for a two-lane major street: major left 4.1 / 2.2 s; minor right 6.2 / 3.3 s; minor left 7.1 / 3.5 s. Heavy-vehicle adjustment: tc + 1.0 · PHV and tf + 0.9 · PHV. Minor left at a three-leg (T) intersection: tc − 0.7 s.
- **Potential capacity.** cp = vc · e^(−vc·tc/3600) ÷ (1 − e^(−vc·tf/3600)), in vehicles per hour.
- **Impedance.** The minor left turn must yield to the EB left turn: p0 = 1 − v1 ÷ c1, and the movement capacity cm,7 = cp,7 · p0.
- **Shared-lane capacity.** cSH = (v7 + v9) ÷ (v7 ÷ cm,7 + v9 ÷ cp,9).
- **Control delay (s/veh).** d = 3600/c + 900·T·[(x − 1) + √((x − 1)² + (3600/c)·x ÷ (450·T))] + 5, with x = v/c and analysis period T = 0.25 h.
- **95th-percentile queue (veh).** Q95 = 900·T·[(x − 1) + √((x − 1)² + (3600/c)·x ÷ (150·T))] · (c/3600).
- **LOS thresholds (TWSC).** A ≤ 10 s; B ≤ 15; C ≤ 25; D ≤ 35; E ≤ 50; F > 50. City of Cle Elum standard: LOS D.

B.3 Check against TENW's own Synchro output

To confirm the method, DN Traffic ran TENW's own inputs (volumes, PHF and heavy-vehicle percentages from the Synchro worksheets in TENW Attachment B) through the same calculation. The results match TENW's Synchro output at every step to within rounding (1 vehicle per hour of capacity, 0.1 second of delay):

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TENW scenario	Step	TENW Synchro	DN Traffic calculation
2022 existing PM	Conflicting flow, stub left / right (veh/h)	691 / 283	691 / 282
	Critical headway, stub left / right (s)	6.42 / 6.22	6.42 / 6.22
	Potential capacity, stub left / right (veh/h)	410 / 756	411 / 757
	Movement capacity, stub left (veh/h)	395	396
	Shared-lane capacity (veh/h)	555	556
	v/c ratio	0.113	0.113
	Stub approach delay / LOS	**12.3 s / B**	**12.3 s / B**
	EB left turn delay (s)	8.0	8.0
2028 baseline PM	Conflicting flow, stub left / right (veh/h)	776 / 318	776 / 317
	Critical headway, stub left / right (s)	6.42 / 6.22	6.42 / 6.22
	Potential capacity, stub left / right (veh/h)	366 / 723	366 / 723
	Movement capacity, stub left (veh/h)	351	351
	Shared-lane capacity (veh/h)	512	512
	v/c ratio	0.138	0.138
	Stub approach delay / LOS	**13.2 s / B**	**13.2 s / B**
	EB left turn delay (s)	8.1	8.1
2028 with project PM	Conflicting flow, stub left / right (veh/h)	832 / 324	831 / 324
	Critical headway, stub left / right (s)	6.42 / 6.22	6.42 / 6.22
	Potential capacity, stub left / right (veh/h)	339 / 717	340 / 717
	Movement capacity, stub left (veh/h)	318	318
	Shared-lane capacity (veh/h)	460	460
	v/c ratio	0.219	0.219
	Stub approach delay / LOS	**15.0 s / C**	**15.0 s / C**
	EB left turn delay (s)	8.2	8.2

TENW's Table 4 reports the 2028 with-project stub approach as LOS B (15.0 s). Both TENW's Synchro worksheet and this calculation give 15.0 s, which is LOS C (over 15 s). This is a reporting error in TENW's table; LOS C is still within the City's LOS D standard.

B.4 Worked example — PM peak hour, 2036 buildout with project (DN Traffic distribution)

This is the highest-volume DN Traffic scenario using the DN Traffic trip distribution. Each step uses the equations in Section B.2.

Step	Calculation	Result
1. Peak-hour volumes	EB left 34, EB through 329, WB through 294, WB right 18, stub left 18, stub right 35 (veh/h)	—
2. PHF and trucks	PHF 0.898 (Oct. 8, 2026 count); trucks: EB 10.3%, stub 3.9%	—

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Step	Calculation	Result
3. Flow rates	v = volume ÷ 0.898: v1 37.9, v2 366.4, v5 327.4, v6 20.0, v7 20.0, v9 39.0	—
4. EB left capacity	vc,1 = 327.4 + 20.0 = 347.4; tc 4.20, tf 2.293	c1 = 1,167 veh/h
5. Impedance	p0 = 1 − 37.9 ÷ 1,167	p0 = 0.968
6. Stub right capacity	vc,9 = 327.4 + 0.5 · 20.0 = 337.4; tc 6.24, tf 3.336	cp,9 = 700 veh/h
7. Stub left capacity	vc,7 = 2·37.9 + 366.4 + 327.4 + 0.5·20.0 = 779.5; tc 6.44, tf 3.536	cp,7 = 361; cm,7 = 350
8. Shared lane	cSH = 59.0 ÷ (20.0/350 + 39.0/700)	cSH = 522 veh/h
9. v/c	x = 59.0 ÷ 522	x = 0.113
10. Control delay	**HCM delay equation, T = 0.25 h**	**12.8 s/veh**
11. LOS and queue	**TWSC thresholds; 95th-percentile queue equation**	**LOS B; Q95 = 0.4 veh**

B.5 All DN Traffic scenarios

Volumes are the 2026 counts grown at 2.5% per year, plus project trips (ITE, 11th ed.) assigned by the stated distribution. PHF and truck percentages are from the October 8, 2026 count. Approach flows at STOP A combine Airport Road and Spansky Way traffic.

Peak — scenario	EB L / T	WB T / R	Stub L / R	vc,7	cm,7	cp,9	cSH	v/c	Stub delay / LOS	EB L delay / LOS
AM — 2026 existing	14 / 114	182 / 8	7 / 40	359	627	831	793	0.06	9.9 / A	7.8 / A
AM — 2028 without project	15 / 120	191 / 8	7 / 42	378	611	821	782	0.07	9.9 / A	7.8 / A
AM — 2028 + project (TENW dist.)	23 / 120	191 / 12	17 / 62	398	591	818	756	0.11	10.4 / B	7.9 / A
AM — 2028 + project (DN dist.)	16 / 120	191 / 10	12 / 47	381	608	819	765	0.08	10.1 / B	7.8 / A
AM — 2036 without project	18 / 146	233 / 10	9 / 52	460	546	772	728	0.09	10.4 / B	8.0 / A
AM — 2036 + project (TENW dist.)	26 / 146	233 / 14	19 / 72	480	528	770	703	0.14	11.0 / B	8.0 / A
AM — 2036 + project (DN dist.)	19 / 146	233 / 13	13 / 56	464	543	771	714	0.11	10.6 / B	8.0 / A
PM — 2026 existing	24 / 257	230 / 9	12 / 25	601	450	773	627	0.07	11.1 / B	7.9 / A
PM — 2028 without project	25 / 270	242 / 9	12 / 26	631	432	760	613	0.07	11.3 / B	8.0 / A
PM — 2028 + project (TENW dist.)	47 / 270	242 / 20	19 / 40	686	393	754	582	0.11	12.0 / B	8.1 / A
PM — 2028 + project (DN dist.)	28 / 270	242 / 16	15 / 30	641	425	756	600	0.08	11.5 / B	8.0 / A
PM — 2036 without project	31 / 329	294 / 11	15 / 32	769	356	704	536	0.10	12.4 / B	8.2 / A
PM — 2036 + project (TENW dist.)	53 / 329	294 / 22	22 / 46	824	323	698	507	0.15	13.3 / B	8.3 / A
PM — 2036 + project (DN dist.)	34 / 329	294 / 18	18 / 35	780	350	700	522	0.11	12.8 / B	8.2 / A

AM: PHF 0.913; trucks EB 12.5%, stub 4.3%. PM: PHF 0.898; trucks EB 10.3%, stub 3.9%. Volumes in veh/h; capacities in veh/h; delay in s/veh.

B.6 Conclusion of the check

Using TENW's inputs, the calculation reproduces TENW's Synchro results to within rounding, including the 2028 with-project LOS C that TENW's Table 4 misreports as LOS B. Using the 2026 counts, the stub approach to SR 903 stays at LOS A–B (13.3 s maximum) through the 2036 buildout, under either trip distribution. DN Traffic therefore agrees with TENW that intersection capacity, as measured by the HCM stop-control method, is not deficient. The variances that matter are the elements this method does not measure: the two-stop geometry, the uncontrolled movements, truck queuing, and safety.

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C. Appendix — Glossary

Term	Meaning
AASHTO	American Association of State Highway and Transportation Officials; publisher of A Policy on Geometric Design of Highways and Streets (the “Green Book”).
ADT / vehicles per day	Average daily traffic: the number of vehicles passing a point in 24 hours.
Apron	An open paved area at an intersection with no curbs, islands or markings defining the travel paths.
Channelization	Curbs, islands, pavement markings or delineators that separate and guide traffic movements.
Cluster	In this report, the SR 903 / Airport Road / Spansky Way intersection area, which functions as one intersection but is controlled as several.
Control delay	The extra time a vehicle spends because of a traffic control device (slowing, stopping, waiting and accelerating), in seconds per vehicle.
DA	Development Agreement (City File DA-2024-001), the contract that would set the project’s development standards for its 10-year term.
Free (uncontrolled) movement	A movement with no stop sign, yield sign or signal; drivers proceed without being required to stop.
HCM	Highway Capacity Manual, 7th edition (Transportation Research Board), the standard method for intersection level of service.
Heavy vehicle / truck share	Trucks, buses and recreational vehicles as a percentage of all traffic.
ITE / LUC	Institute of Transportation Engineers Trip Generation Manual, 11th edition; Land Use Code identifies the land-use category (210 single-family detached; 215 single-family attached; 220 low-rise multifamily).
LOS	Level of service, a letter grade A–F based on average control delay. The City of Cle Elum standard is LOS D.
MDNS	Mitigated Determination of Nonsignificance: the City’s SEPA threshold determination for the project (August 14, 2025).
Microsimulation	Computer modeling of individual vehicles (e.g., SimTraffic) that can show queue spill-back and interaction between closely spaced intersections.
MUTCD	Manual on Uniform Traffic Control Devices, the national standard for signs, signals and markings, adopted in Washington.
PHF	Peak-hour factor: the hourly volume divided by four times the busiest 15-minute volume; it measures how peaked traffic is within the hour.
Peak hour	The busiest 60 consecutive minutes of a count period.
Proportional (pro-rata) share	A payment toward an improvement based on the project’s share of future traffic, rather than construction of the improvement.
Queue (95th percentile)	The queue length that is exceeded only 5% of the time during the analysis period.
ROW	Right-of-way: land owned or dedicated for a public street.
SEPA	Washington State Environmental Policy Act (RCW 43.21C; WAC 197-11).
Sight distance (intersection)	The clear view a stopped driver needs to see approaching traffic and complete a turn safely.
Skew	The amount by which two streets meet at other than a right (90-degree) angle.
Station	A distance along a road centerline on engineering plans; 2+40 means 240 feet from the starting point.
TIA	Traffic Impact Analysis.

Term	Meaning
TWSC	Two-way stop control: an intersection where only the minor street stops.
v/c	Volume-to-capacity ratio: demand divided by the capacity of a movement or approach.
vph	Vehicles per hour.
WB-67	AASHTO design vehicle representing a large tractor-semitrailer (about 74 ft long).
85th-percentile speed	The speed at or below which 85% of vehicles travel; the usual basis for evaluating posted speed limits.

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D. Appendix — Contacts

Parties, agencies and sources referenced in this report. Contact details are taken from the documents in the record or from the parties' published business information.

Role	Name	Organization	Contact
Engineer of record	Gary A. Norris, PE, PTOE, RSP2i	DN Traffic Consultants, Inc.	PO Box 547, Preston, WA 98050-0547; 425-765-5721; Gary@dntrafficconsultants.com
Field data and analysis support	Joshua R. Henriot	DN Traffic Consultants, Inc.	Via DN Traffic
Appellant / client	Cherie Tourangeau; Patrick Reilly	Friends of Deer Meadow, LLC	Via counsel
Appellant's counsel	Terrence (Terry) Danysh	PRK Livengood PLLC	10900 NE 4th St., Ste. 1850, Bellevue, WA 98004; 425-990-4003; tdanysh@prklaw.com
Appellant's stormwater engineer	John Farleigh, PE	Cecil + Associates, LLC	206-450-3068; johnf@cecilnassoc.com
Applicant / owner	Jeff Stubbs (contact)	Wildwood Ranch, LLC	PO Box 895, Roslyn, WA 98941; 509-674-8797 (per civil plans, sheet C0.0)
Applicant's engineer and surveyor	Bryan Tappel, PE (contact); Marc Kirkpatrick (owner)	Encompass Engineering & Surveying	110 S. Oakes Ave., Ste. 250, Cle Elum, WA 98922; 509-674-7433
Applicant's traffic engineer	Michael Read, PE, Principal	Transportation Engineering NorthWest (TENW)	11400 SE 8th St., Ste. 200, Bellevue, WA 98004; 206-361-7333; mikeread@tenw.com
Lead agency (planning)	Colleda Monick, Planning Consultant	City of Cle Elum	119 W. First St., Cle Elum, WA 98922; 509-966-7000; colleda.monick@cleelum.gov
Lead agency (engineering)	Benjamin A. Annen, PE, Development Review Engineer (addressee of the TENW TIA)	City of Cle Elum	119 W. First St., Cle Elum, WA 98922; 509-674-2262
Deer Meadow Drive access and upgrade	Public Works Plan Review Team	Kittitas County Department of Public Works	411 N. Ruby St., Ste. 1, Ellensburg, WA 98926; 509-962-7523
Student transportation	District office	Cle Elum-Roslyn School District	4244 Bullfrog Rd., Cle Elum, WA 98922; 509-852-4819
Emergency care	Emergency Department (24 hours; Level IV trauma)	Kittitas Valley Healthcare	603 S. Chestnut St., Ellensburg, WA 98926
Machine counts	Traffic Data Gathering	Traffic Data Gathering	11410 13th St. SE, Lake Stevens, WA 98258; 425-334-3348
Hearing	Hearing Examiner, open-record hearing, November 12, 2026, 6:00 p.m.	City of Cle Elum	City Council Chambers, 119 W. First St., Cle Elum

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Exhibit 5

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PETERSON RUSSELL KELLY LIVENGOOD PLLC
10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700 | F: 425.471.0714

GARY A. NORRIS, P.E., P.T.O.E

Project Manager/Senior Traffic Engineer

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Total Professional Experience:

- 52 years

Education:

- University of Washington, M.S., Civil Engineering, Transportation Planning, 1977
- University of Washington, B.S., Civil Engineering, Traffic Engineering, 1973

Professional Registrations and Licenses:

- Road Safety Professional 2i (RSP 2i)
- Road Safety Professional 1(RSP 1)
- Professional Engineer, RI, 2018
- Professional Engineer, DC, 2013
- Professional Engineer, VA, 2013
- Professional Engineer, MD, 2011
- Professional Traffic Operations Engineer, US, 2004
- Professional Engineer, ID, 2003
- Professional Engineer, OR, 1998
- Professional Engineer, WA, 1980

Professional Societies

- Fellow, Institute of Transportation Engineers
- Past President, Washington State Section ITE
- Member, ITE - Transportation Safety Council
- Chairman, Washington State Section ITE Safety Committee
- Member, APWA

Publications

- Sub Area Transportation Planning: *A Case Study of Bellevue Washington*, Traffic Quarterly, Eno Foundation, 1978.
- Work Zone Traffic Control: *The Next Generation.* ITE District 6 Annual Meeting Compendiums of Papers, 2002.

Awards

- FHWA, Highway Safety Scholarship Grant

Brief Summary of Experience:

Gary Norris is a senior engineer with over 50 years of experience in traffic engineering and transportation planning as a consulting engineer and a traffic engineer and planner for local governments. Mr. Norris spent 16 years as a transportation planner and traffic engineer for the Cities of Seattle, Bellevue and Renton, Washington. A major focus of his career has been the evaluation, analysis, and project formulation for the improved multi-modal safety of our transportation system. He has served on local, regional, and state committees for the improvement of multi-modal traffic safety. He has aggressively pursued the development of and funding for necessary traffic safety projects.

Selected Relevant Projects

Center Parkway at Grade Railway Crossing.
Mr. Norris was retained as an expert witness for the Tri City Railway regarding the WUTC Petition to allow the Cities of Richland and Kennewick to construct an at-grade railway crossing on Center Parkway. Mr. Norris reviewed background documents and presented testimony before the WUTC Administrative Law Judge in regard to the petition.

Assessment of the Transportation Plan for BRAC Recommendation #133 Project Fort Belvoir-Mark Center, Virginia; US Department of Defense – Inspector General's Office.
As a sub consultant to SAMS, Inc., Mr. Norris prepared an assessment of the Army's Transportation Plan for the relocated Washington Headquarters Service to Mark Center in Alexandria, Virginia. The work required an assessment of the viability of the Army's Plan to accommodate the transportation needs of the relocated 7000 employees and defense contractors. The assessment evaluated previous transportation studies and other documentation that was used in the formulation of the Army's Transportation Plan. The findings of the assessment were summarized in a report submitted to Congress. The project also included presentation of our findings to Congressional review committees on defense funding.

Experience with Highway Safety Improvement Program (23 CFR 924) As a municipal traffic engineer and planner for the Cities of Bellevue and Renton, WA, Mr. Norris was involved in the development of the State of Washington Model Traffic Records System which included crash information, enforcement activity, signing and channelization in a digital format. This work included the development of a records protocol for collecting, storing, and retrieving data.

As the traffic safety engineer for these Cities, Mr. Norris prepared an annual evaluation of the crash history on City streets with a focus on evaluating data to determine cause of crashes and potential countermeasures. This work resulted in a prioritized list of traffic related safety improvements which were then submitted to the state for potential Hazard Elimination and Traffic Safety grant funding.

As a private consultant to state and local agencies, Mr. Norris has extensive experience in the analysis of crash

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histories and development of countermeasures to address the safety deficiencies. Some of these projects include:

Washington State Rail Office – On Call Contract. Conducted a safety evaluation of 15 at grade railway crossings which included documentation of crash history, evaluation of traffic control devices, estimation of future crash potential, and identification of potential counter measures including closure of the crossing. The study process involved the use of data collected consistent with TMS requirements of CFR 500.

King County Department of Transportation – Traffic Safety On-Call Project. Mr. Norris was a member of the consultant team which prepared a safety/crash analysis of 100 major intersections throughout King County, Washington. The purpose of the study was to research the crash history records of roadway segments and intersections in the County and identify a prioritized list of 100 locations for improvement. Additional analysis evaluated each location and identified countermeasures to address the existing roadway or intersection deficiency. This list was further prioritized and included in the agency's Six Year Transportation Improvement Program.

City of Edgewood – Mr. Norris assisted Ms. Southern in the preparation of a pedestrian safety study intended to guide the City in the development projects to support safe and efficient pedestrian circulation in the City following a traffic fatality involving a student waiting for a school bus.

Experience with Statewide Transportation Improvement Program (23 CFR 450.216) and Statewide Transportation Plan (23 CFR 450.214 and 322)

As an Assistant Transportation Planner for the City of Seattle; Transportation Planning Engineer for the City of Bellevue; and Transportation Systems Manager for the City of Renton, Mr. Norris was responsible for the preparation of each agency's six-year transportation improvement program. This project required extensive effort in reviewing traffic related data to identify deficient roadway sections and intersections and determine countermeasures which were formulated into projects to include in the six-year transportation improvement program.

In his positions at the City of Bellevue and Renton, Mr. Norris also served as a technical advisor to the Sub Regional Committee on Transportation for the Puget Sound Regional Council. In this role Mr. Norris established project rating criteria which provided the basis for determining the priority for all projects competing for Federal funds. Through this process, Mr. Norris worked with the Committee to establish a regional project priority list for submittal to WSDOT and eventual inclusion in the State Transportation Improvement Program.

Through this committee, Mr. Norris also participated in the development of the Statewide Transportation Plan and the Transportation Plan for the Puget Sound metropolitan area prepared by the Puget Sound Regional Council.

As a private consultant, Mr. Norris has extensive experience in the development of local transportation plans based on guidelines of the state and metropolitan area plans including:

Kittitas County 20-Year Transportation Plan/Study; Kittitas County, WA: Lead Engineer for the development of the 20-Year Transportation Plan for Kittitas County. The project included an evaluation of the existing county road system for safety, capacity, and consistency with existing County Road Standards. The consultant collected daily and peak hour traffic counts at 30 intersections throughout the county and estimated turning movement volumes at the remaining arterial/arterial intersections; collected crash data and developed crash rates for each arterial segment and arterial/arterial intersection; evaluated each arterial for consistency with the updated County Roads Standards; development of a traffic forecasting model to estimate 20 year growth in transportation; prepared a 20 year capital facility plan to address the capacity and safety deficiencies; and developed transportation policies to assist in the future development of the county road system.

City of Cle Elum 20 Year Transportation Plan/Study; CleElum, WA. Lead Engineer for the development of a 20 Year Transportation Plan for the City of Cle Elum consistent with GMA and State Transportation Plan Objectives. The study conducted an evaluation of existing safety and capacity deficiencies with the City. A new circulation plan was developed to address safety, capacity, and efficient circulation through and around the community.

Experience with Section 402 Highway Safety.

As the City Traffic Engineer for the City of Renton, Mr. Norris served on the Washington State Traffic Safety Commission which was formed under the auspices of Section 402 directives. Through participation in this agency, Mr. Norris worked with other local traffic engineers to develop, implement, and support the Washington State Safety Program.

Experience with Maintenance of Traffic (MoT).

Multnomah Boulevard Force main Project. Bureau of Environmental Services, City of Portland,

Portland, Oregon. Mr. Norris was the project lead for the development of the work zone traffic control plans for the construction of the Multnomah Boulevard Force main project. Because of the restricted roadway cross section, traffic detour routes were created to divert all traffic from Multnomah Boulevard to parallel arterials including Vermont Avenue and Garden Home Road. This work includes extensive analysis of diverted traffic and necessary modifications to the existing traffic control signals. DN Traffic collected daily and peak hour turning movement counts at 10 critical intersections. Work zone traffic control plans were developed to implement the detour routing.

Fanno Creek Basin Force main Project. Bureau of Environmental Services, City of Portland, Portland, Oregon. Mr. Norris was the project lead for the development of the work zone traffic control plans for the construction of the Fanno Creek force main. The traffic control plans development is considering lane closures and restricting traffic to a single lane during night time work hours or complete closure of the roadway and detouring traffic to alternatives routes.

Portsmouth Force main Project. Bureau of Environmental Services, City of Portland, Portland, Oregon. Mr. Norris was the project lead for the development of work zone traffic control plans for Segment 1 and Segment 2 of the Portsmouth Force main Project. The traffic control plans included lane closures and time of day restrictions throughout the work zone. Several alternatives were considered to address the heavy peak hour traffic volumes generated from the UPS and other major industrial uses.

Oak B Basin Relief Project. Bureau of Environmental Services, City of Portland, Portland Oregon. Mr. Norris was the project lead for the development of work zone traffic plans for the construction of the Oak B pipeline along Burnside and several intersecting streets. The traffic control plans included lane closures along Burnside Avenue for approximately 12 blocks. This work necessitated signal modifications and extensive signing and traffic channelization along Burnside and Sandy Boulevard, two of the busiest arterial streets in the City of Portland.

Eastside Combined Sewer Outfall Project. Bureau of Environmental Services, City of Portland, Portland, Oregon. Mr. Norris was the project lead for the development of the work zone traffic control plans for the construction of the Eastside CSO project. The project included pump stations and several miles of underground tunneling. The traffic control includes lane restrictions and lane closures to maintain pedestrian and vehicular circulation during construction.

Westside Combined Sewer Outfall Project. Bureau of Environmental Services, City of Portland, Portland, Oregon. Mr. Norris provided technical review for the development of the work zone traffic control plans for the Westside CSO project. The project included rechannelization of vehicular and pedestrian traffic to support construction of the Westside pipeline. The work included road and lane closures, signal modifications, and time of day restrictions and coordination with the contractor and City staff.

Tanner Creek Interceptor Project. Bureau of Environmental Services, City of Portland, Portland, Oregon. Mr. Norris was the project lead for the preparation of the work zone traffic control plans for the construction of the Tanner Creek interceptor. The work included closure of five blocks of Burnside between 11th Avenue and 15th Avenue. The closure necessitated the conversion of Alder Street a two-lane one-way roadway to a four-lane two-way road. This work included signal modifications, extensive signing and advance warning for pedestrian and vehicular traffic. The results of the work and the process were summarized in a paper presented to the annual meeting of the District Six Institute of Transportation Engineers.

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Exhibit 6

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PETERSON RUSSELL KELLY LIVENGOOD PLLC
10900 NE 4th Street, Suite 1850
Bellevue, WA 98004-8341
T: 425.462.4700 | F: 425.471.0714

The foregoing is a peer review and evaluation of the traffic impact analysis prepared for the proposed 93 lot subdivision known as Wildwood Ranch Preliminary Plat located in the City of Cle-Elum Washington.

On October 22, 2026, the City issued an addendum to the MDNS based on submitted revision to the Preliminary Plat and Development Agreement submitted by the developer. The revised proposal reduces the subdivision by one residential and (93 to 92) and makes minor modification to design, reducing the term of the Development Agreement from 15 years to 10 years.

9.1 Findings

6.1 Queue storage

The calculated 95th-percentile queue at the SR 903 stop is below one vehicle in every scenario. Averages, however, do not describe this location. The 85 ft between the two stops holds about three passenger cars or one semi-trailer, and the Airport Road connection lies within it. A single truck waiting at SR903 therefore blocks both the Airport Road connection and the Spanski Way approach, which is what DN Traffic observed. With trucks making up 4% of stub traffic and 9–17% of SR 903 traffic, these. events are recurring.

6.2 Limits of the stop-control method here

The HCM method treats each stop as an isolated intersection. It cannot represent the cluster's interactions:

- a stop 85 ft upstream of another stop, with a free-flowing connection between them
- uncontrolled entries from SR 903 crossing that free-flowing movement
- queue spill-back from a stopped truck
- side-by-side stopping on the unmarked apron
- access to the open yard frontages. TENW's three separate Synchro intersections share the same limitation. A microsimulation of the cluster (e.g., SimTraffic) and a field traffic-conflict study are needed to evaluate it properly.

7. Uncontrolled Conflict Area

Three movement groups meet in the cluster with no control:
- the free Airport Road ↔ Spanski Way through movement
- eastbound left turns from SR 903, which enters from a 45-mph highway
- westbound right turns from SR 903, including the hairpin onto Airport Road

In the 2026 PM peak hour, 39 vehicles made the Airport Road ↔ Spanski Way movement, and 33 entered from SR 903 with no control. Under DN Traffic's distribution, the Airport Road ↔ Spanski Way volume rises to about 83 vehicles per hour in 2028

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and about 98 in 2041, roughly two and a half times today's. Under TENW's distribution, the added trips shift instead to uncontrolled turns from SR 903 into Spanski Way: 11 vehicles per hour today, about 46 in 2028 and about 50 in 2041. Either way, project traffic substantially increases the vehicles moving through an area where nobody is required to stop, and where conflicts, stop-sign violations and unprotected children and cyclists were already observed at today's volumes.

TENW identified part of this problem. It recommended stop control on the westbound Airport Road approach, and delineation between the roadway and the adjacent commercial lot, "regardless of the project." As of October 8, 2026, Airport Road traffic still had no stop at Spanski Way, and the apron remained unchanneled. The MDNS requires only a proportionate share of that improvement (Condition 11), with no timing identified.

8. Site Access and Elements Not Yet Analyzed

- E. 3rd Street accesses. Two new site roads connect to E. 3rd Street; TENW did not analyze them or the E. 3rd Street corridor.

- Capacity: LOS A–B in all scenarios; the project does not create an LOS deficiency at the City's LOS D standard. The analysis relied on by the MDNS rests on 2022, PM-only data at three intersections, a 2028 horizon inconsistent with the requested 10-year buildout, and a distribution that assigns 5% of trips to Airport Road where existing neighborhood traffic uses it for about 71%. An AM peak analysis is required to address the impact of development traffic entering the arterial roadway network.

- Project traffic roughly doubles the volume on the uncontrolled Airport Road/ Spanski Way movement by 2028 and raises it to about 2.5 times todays by 2041. That movement sits within a cluster with an 84-ft stop-to-stop stub, uncontrolled entries from a 45-mph state route, a 9–17% truck share, no pedestrian facilities, and observed conflicts and stop-sign violations.

- The E. 3rd Street accesses, Deer Meadow Drive, sight distance, collision history, school travel, emergency and evacuation access, and truck turning have not been analyzed.

9.2 Recommended analyses before any threshold determination

- An updated TIA (as MDNS Condition 11 already requires) with current AM and PM counts beginning at 4:00 PM, a peak-season adjustment, a horizon matching the Development Agreement buildout, identified pipeline development, and the E. 3rd Street accesses and Deer Meadow Drive in the study area.

- Microsimulation of the SR 903 / Airport Road / Spanski Way cluster as one system, including truck queuing and spill-back.

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• A field traffic-conflict study, plus WSDOT crash history update to support data presented herein.

• Intersection sight distance measurements at the SR 903 stop, at each of the new driveways on E3rd St, the two new accesses on E 3rd St, for the northbound approach at the E 1st St/Spanski Rd, and for all the lots on the north side of E 1st St in the E 1st St/Spanski Rd intersection vicinity.
• WB-67 turning templates for the hairpin and the stub; a width assessment of the Spanski Way culvert section.

• A school-travel assessment based on district bus routes, stops and walk-zone policy; and an emergency-access and evacuation assessment.

9.39. Mitigation for consideration

• Reconfigure and channelize the cluster so every conflicting movement is assigned control, at minimum a stop or yield for Airport Road at Spanski Way, as TENW itself recommended. Installing the improvement before the first phase is occupied rather than as a cost share.

• Define the yard frontages along the stub with curbing or delineation (access management), and remark stop bars.

• Widen the Spanski Way culvert section and provide a pedestrian walkway or sidewalk from the site to the cluster and to school-bus stops.

• Evaluate a second outlet, or improvements to the westbound local-street route, for emergency access and evacuation.
• Address truck staging and circulation at the cluster with WSDOT and the City.

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