

March 21, 2024

Kittitas County
Community Development Services
411 N. Ruby St. Suite 2
Ellensburg, WA 98926

Attn: Jamey Ayling, Planning Manager (jamey.ayling@co.kittitas.wa.us)

Subject: Lewington Comprehensive Plan Rezone Amendment (CP-24-00001) with SEPA checklist. Applicant: Linda Lewington and Rezone Application (RZ-22-00005) Mardee Lake Inc.

The Washington Department of Transportation (WSDOT) has reviewed what was available on the Kittitas County website for the proposed Comprehensive Plan Rezone CP-24-00001 with SEPA Checklist and providing the following comments. The application proposes to change four parcels totaling 150.98 acres from Rural Working to Rural Recreation plan designation. Kittitas County Code (KCC) Zoning 17.30 allows two options for minimum lot size and maximum density in the Rural Recreation zone:

1. Five (5) acres, unless within a cluster plat as provided for in KCC Chapter 16.09, Cluster Platting and Conservation Platting;
2. For lots in cluster plats, the county may approve lots as small as one half ($\frac{1}{2}$) acre with the ability to increase the base density of one (1) unit per five (5) acres to a density of 0.4 units per acre (2 units per 5 acres), provided development rights are transferred pursuant to KCC Chapter 17.13.

Based on the KCC 17.15.060, single family dwellings are permitted uses and two-family dwellings can be approved by condition use. To help calculate the potential change in traffic demand to state highways, an estimate for weekday annual average vehicle trips (AADT) is completed using Institute of Engineering (ITE) 11th Edition trip generation software.

According to KCC 17.30, the maximum density for Rural Recreation on 150-acres would be 2 units per 5-acres, for a total of 60 units. ITE trip generation data for single family detached dwellings weekday AADT is approximately 9.43. The AADT for 60 dwellings is approximately 565 AADT trips per weekday. Under conditional use approval for two-family dwellings, the estimated dwellings could be up to 120 units. ITE data for two-family dwellings estimated a 7.2 weekday AADT, with a full development estimate of 864 weekday AADT.

If the rezone application is approved, the estimated range of full development is 565 to 864 weekday AADT. This may be a traffic impact on local and state roads, particularly I-90 and the Exit 54 interchange.

- As future developments are proposed, they will be subject to review for their impacts to the WSDOT system, typically obtained through a Traffic Impact Analysis (TIA) performed by the developer.

Since this is a non-project SEPA action, it is important to consider direct and indirect impacts on public infrastructure and environmental resources in the area:

- We believe the density and location of the proposed application has the potential to affect the function of publicly funded improvements associated with the Interstate 90 Snoqualmie Pass East project (I-90 project). The I-90 project is an investment of over a billion dollars of public funds that is improving a 15-mile section of the interstate from Hyak at milepost (MP) 55.1 to Easton at MP 70.3. It meets community, regional, and statewide transportation needs while addressing concerns associated with the barrier effects of the highway within a critically important wildlife movement corridor, identified in the Snoqualmie Pass Adaptive Management Area Plan (SPAMA) (USFS 1997).
- WSDOT, the US Forest Service (USFS), and other natural resource agencies have collaborated for over twenty years to identify and define a landscape-scale, watershed-based approach to allow for the expansion of I-90 on National Forest land. We identified the Gold Creek Valley as an important connectivity emphasis area because of the ecological improvement opportunities within the watershed, including that it is an important wildlife corridor to link the Alpine Lakes Wilderness to the north with the Norse Peak Wilderness to the south. This connectivity corridor is shown on the WA Department of Fish and Wildlife Priority Habitat and Species maps. Significantly increased land use densities and development within and adjacent to the valley could adversely affect our investments in wildlife connectivity structures (bridges, culverts and overcrossings) and affect habitat restoration areas.
- WSDOT is concerned about new development in and around the Gold Creek Valley. The proposed rezone warrants close attention from WSDOT, as well as collaboration with Kittitas County and other agency partners to ensure public investments are consistent with adjacent land uses. We believe that by providing adjoining property owners and Kittitas County with the context behind WSDOT's ongoing public investments in the corridor, the public will better understand and support the importance of maintaining the Gold Creek Valley and other identified watersheds and connectivity emphasis areas.
- WSDOT designed the I-90 Project and made these investments to be consistent with the SPAMA plan along with the Kittitas County Comprehensive Plan.

- The Snoqualmie Pass Sub Area Comprehensive Plan-Master Plan (2016) (Kittitas County Comprehensive Plan (2021)) identified the current land use designations in the Snoqualmie Pass and Hyak area with nearly all parcels to the north/east of I-90, including this proposal, designated to allow a density of one unit/20-acres. On the west/south side of I-90 near the existing ski resort, housing and commercial development that are designated as LAMIRD, residential or Rural Recreation zones. The proposal is included in the area identified as Subarea D in this plan. The plan states that the residential projections to 2015 indicate that there is sufficient residential land capacity to meet the estimated demand at that time. There is no identified need for additional residential units. This subarea plan should be updated to allow new projections to be developed along with the identification of residential capacity and for this area. It should include a plan for transportation system improvements (as well as other capital facilities) to support the more intense developments east of I-90 that impact Exit 54 interchange, as well as Exit 53 interchange.

Other state highway maintenance and operational standards may also apply to development of the subject property:

- This segment of I-90 is a fully controlled Rural Interstate with a posted speed limit of 70 miles per hour and a Highway of Statewide Significance (HSS).
- Direct access to I-90 is prohibited. Access to the interstate may be available via the Exit 54 interchange. However, we recommend you coordinate future plans with WSDOT and USFS to determine the access process and construction requirements. Jacob Prilucik is the contact at WSDOT, and he can be reached at (509) 577-1635.
- The Level of Service (LOS) threshold for HSS highways is set by the state, and not the local jurisdictions. LOS "C" is the threshold for rural HSS highways. The proponent will need to mitigate their impacts to the I-90 ramps to keep the LOS at "C" or better.
- This section of I-90 is designated as a National Scenic Byway. We encourage the County to take this designation into consideration when deciding on this change in land use.
- The WSDOT right-of-way fence typically lies one foot inside our right-of-way line. For the safety and security of I-90, the applicant will need to construct a minimum six-foot tall solid barrier fence (no gates) on their property adjacent to the state right of way. The right-of-way fence must not be altered or moved.
- Any signs that may be proposed as part of this project will need to comply with the state Scenic Vistas Act of 1971 (RCW 47.42 and WAC 468-66). Please contact Trevor McCain of the WSDOT Headquarters Traffic Office for specifics. He can be reached at (360) 705-7282.

- I-90 is an existing state facility, and the applicant is proposing additional noise sensitive land use. The proponent and future residents should be aware of highway and traffic noise and expect traffic noise to continue to grow into the future. It is the developer's responsibility to dampen or deflect any traffic noise for this development.
- Any proposed lighting should be directed down towards the site, and away from I-90. During periods of darkness, traffic related light may be more noticeable within the subject property. We recommend that if highway related lights are a concern, that visual screening be considered and implemented as part of any future development.
- Stormwater and surface runoff generated by this project must be retained and treated on site in accordance with regulating agencies' standards. Any discharge of storm water into WSDOT rights-of-way will require an approved utility permit.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding our comments, please contact Mark Reynolds at (509) 577-1929.

Sincerely,

Mark Reynolds

for
Paul Gonseth, P.E.
Planning Engineer

PG: vj/mrr
cc: Brian White P.E., Regional Administrator – South Central Region
Mike Krahenbuhl, SCR Area 1 Maintenance Superintendent
William Sauriol, SCR Environmental Program Manager