

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



Phone: (509) 674-2262
Fax: (509) 674-4097
CleElum.gov

Date: January 9, 2024

To: Jamey Ayling, Staff Planner

From: Matthew Lundh, Mayor

With Copies To: Mark Cook, Kittitas County Public Works Director

Subject: Suncadia Social Plat, LP-23-00004

We appreciate the opportunity to review and provide feedback on the recently submitted Suncadia Social Development, dated December 27, 2023. We are concerned that the SEPA checklist submitted with the application references the 20-plus year-old traffic analysis performed in the original Environmental Impact Statement (EIS) for the MountainStar Master Planned Resort and does not contain any updated evaluation of current and anticipated future conditions with the proposed application. The City feels strongly that this absence of analysis is inadequate. We request, therefore, that the checklist be supplemented with meaningful traffic analysis and circulated again for public review and comment.

The City of Cle Elum has previously expressed concerns regarding continuing deficiencies of monitoring of traffic impacts for Suncadia and we request that Suncadia and the County address the identified deficiencies of monitoring, analysis and reporting prior to moving forward with additional development.

The City has detailed its concerns in letters dated June 26, 2023 as well as in a letter dated October 9, 2023 (see attached). While we acknowledge the efforts made, we have identified concerns related to incomplete data collection, specifically concerning the collection period and methodology. These concerns are derived from the inconsistencies with the Suncadia MPR Conditions of Approval (COA), specifically Item C-17 Monitoring Program, dated December 2, 2008, and we have serious concerns over how this new project will affect traffic. To recap our previous concerns:

1. **Limited Data Collection Period:** The data collection period from Friday, September 1, 2023, through Sunday, September 3, 2023, does not encompass the entire Labor Day weekend, as stipulated in the MPR COA. The exclusion of Labor Day itself raises questions about the comprehensiveness of the 2023 data collection efforts, impacting the meaningful comparison to prior years.
2. **Restricted Intersection Counts:** The limited intersection counts collected on just Saturday, September 2, 2023, from 3 pm to 6 pm, do not provide a complete understanding of traffic patterns during the Labor Day weekend, as outlined in the MPR COA. This restricted data collection limits the scope of the assessment and fails to provide meaningful information for comparison to prior years.
3. **Exclusion of Labor Day:** The exclusion of Labor Day from the data collection for Table 1 and Table 2, which previously included an average count for the entire weekend, leads to a skewed

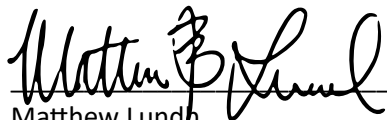
representation of traffic flow during the holiday period. This omission may impact the accuracy of traffic trends.

4. **School Driveway Level of Service (LOS):** Table 8 highlights the Level of Service (LOS) at the school driveways, revealing consistent deficiencies without any mention of improvements. This raises concerns about the effectiveness of the monitoring program in addressing critical traffic issues.

The inconsistencies and omissions in the Suncadia 2022 and 2023 data collection process render the comparison with previous data inappropriate and essentially meaningless. We previously expressed our concerns and hoped for corrective actions moving forward.

We urge the Kittitas County Public Works and Community Development Departments to address these concerns prior to approving additional development in Suncadia and ensure that future data collection efforts strictly adhere to the requirements outlined in the MPR COA. An accurate assessment of traffic conditions is crucial for the implementation of effective traffic management strategies in the Kittitas County area. The present checklist discussion of traffic impacts is insufficient.

Thank you for your attention to this matter. We look forward to your prompt response and collaborative efforts in addressing these concerns.



Matthew Lundh
Mayor

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Date: June 26, 2023

To: Mark Cook and Josh Fredrickson

From: Ben Annen, Gregg Dohrn, Colleda Monick, and Richard Weinman

With Copies To: Mayor McGowan, Rob Omans, and Mike Engelhart

Subject: Suncadia Master Planned Resort
2023 Traffic Monitoring Report

Thanks for the opportunity to review and informally discuss the 2023 Traffic Monitoring Report for the Suncadia Master Planned Resort dated February 2023. The City is pleased to see that the monitoring of traffic impacts associated with Master Planned Resorts has resumed, and we look forward to our ongoing discussions on how best to apportion traffic impacts among development activities within the City limits and the unincorporated County.

For the record, we offer the following comments.

1. The Amended and Restated Development Agreement by and Between Kittitas County, Washington and Suncadia LLC relating to the Development Commonly Known as the Suncadia Master Planned Resort dated December 2, 2008 (Suncadia MPR Development Agreement) includes a condition of approval (C-17) that requires Suncadia to prepare and submit an annual monitoring report, unless the Director of Public Works and the applicant approve an alternate frequency for some or portions of the monitoring requirements.

Without further context, the 2023 Traffic Monitoring Report provides an incomplete picture and may be misleading. We ask that the report be amended or an addendum be prepared that provides more background information, including but not limited to the following:

- a. How many traffic reports were prepared prior to the 2023 report? These reports should be attached as an appendix and the City of Cle Elum would appreciate a copy of each, if they exist.
 - b. How and when was an alternative frequency for these monitoring reports made?
 - c. Did the County and/or Suncadia solicit comments from WSDOT, Roslyn, South Cle Elum, and Cle Elum prior to initiating the changes?
2. The scope of the 2023 Traffic Monitoring Report does not comply with the requirements of the Suncadia MPR Development Agreement. We understand that the City did not respond to an inquiry from the County on the proposed revisions to the scope of the required monitoring protocol, which is indeed unfortunate. However, it is

not clear that the County has the authority to administratively amend the scope of the monitoring reports, especially when important information is not collected as required. For instance, the recent report does not include traffic counts or any data collection for locations within the Cle Elum city limits. This is disappointing and doesn't capture the full intent of the monitoring provisions included in the Suncadia MPR Development Agreement. On page 2 the 2023 Traffic Report states:

The report meets the requirements of the TMP Agreement described in Section C-17 Monitoring Program from Exhibit F-1 of the Suncadia MPR Conditions of Approval, December 2, 2008.

This is a misleading statement, and we ask that the 2023 Report be amended or an addendum be prepared that highlights the omissions, and that future traffic monitoring reports comply with the conditions of the Master Planned Resort approval.

On May 16, 2023, we voiced these concerns to the County at a Microsoft Teams meeting and you offered to study three City intersections of choice in the upcoming 2024 Report. We appreciate this offer and request that the County study the following intersections:

- SR 903 (Second Street)/Ranger Station Road/Miller Avenue
- SR 903 (Second Street)/Oakes Avenue
- N Pine Street/W First Street

3. The Suncadia MPR Condition of Approval C-17 k. iv. requires that the traffic monitoring report include identification of completed and planned road improvements. The Executive Summary includes the following statement:

All road and traffic improvements listed in the Conditions of Approval and related documents of the MPR-FEIS have been completed.

However, the report does not identify the road improvements that have been completed, which is an important consideration with respect to upper Kittitas County transportation planning. We ask that this be included in an addendum to the report, including what improvement was completed, when it was constructed, and who paid what share of each improvement.

4. The purpose of the 2023 report is not clear. It is our understanding that the purpose of the report is to summarize existing traffic conditions and to compare those findings with the 2000 baseline traffic conditions. It is our understanding that this data would support future analysis and be used to make recommendations in the future on additional mitigation that may be required. However, there are several statements in the report that appear to be conclusions, such as:

Based on conclusions above it can be assumed that the traffic impacts of future MPR development to the local road network will be within the forecasted thresholds established in the MPR-FEIS.

Overall, the MPR is not generating excessive parking impacts in Roslyn and Cle Elum.

We ask that the report be amended or an addendum prepared that removes these conclusions or explains that they are preliminary findings subject to further review and analysis.

5. The report notes that there will be significant reductions in the projected buildout at Suncadia. This is speculative and is not consistent with our understanding of what is being discussed by the County and New Suncadia. The report also speculates, with no support, that Suncadia's future growth will be consistent with conditions forecasted in 2000.

We ask that the report be amended or an addendum prepared to include the information provided by New Suncadia that provides the basis for the following statement in the 2023 Report:

And furthermore, Suncadia does not plan to complete its allowed 4,650 residential unit threshold.

Do you recommend that the City include this assumption in the City's analysis of the traffic impacts associated with the proposed modifications to the Bullfrog UGA Master Site Plan and Development Agreement?

If this is not an accurate statement about the build-out of the Suncadia MPR, we ask that it be removed from the Report.

6. Table 13 presents trip generation by Suncadia. We are surprised to see summer weekday counts were higher than summer weekend and holiday weekend counts. Perhaps there has been a shift from the Suncadia MPR being primarily weekend second homes to primary homes? We understand that the Cle Elum-Roslyn School District may have relevant data on this question.

7. The report includes the following conclusion:

Study intersections around the MPR continue to satisfy county LOS standards with no significant delay impacts calculated for both the summer weekday and weekend conditions.

Do we understand correctly that the data collected says that there is no traffic problem on either Bullfrog Road or SR 903, not even on weekends in the summer months? That does not appear to be consistent with public comments recently received by the City. Do you concur with this conclusion, and do you recommend that this be reflected in the City's analysis of the traffic impacts associated with the proposed modifications to the Bullfrog UGA Master Site Plan and Development Agreement?

8. The report identifies intersections in the vicinity of the local schools that are operating at LOS D which is not in compliance with County standards (LOS C for rural roads). However, the report includes the following statement:

A high-level review of the traffic volumes and pedestrian crossing volumes does not suggest a traffic signal or other traffic control measure is warranted. Vehicle delays for a very short time, may not create a significantly adverse traffic impact and mitigation related to Suncadia is not recommended.

This conclusion may be premature and not supported by the data. We ask that it be removed from the report, and that it be further addressed in an addendum indicating that it is truly high level, based on a preliminary analysis, and a more detailed study will be conducted in the future.

9. Table 6 presents Road Segment Monitoring, peak hour volumes for holiday summer weekend conditions, measured on Labor Day weekend. The Suncadia monitoring report measured 653 vehicles per hour (vph, which includes both directions of travel) for location 10, Bullfrog Road south of SR 903. In comparison, TENW's 47 North SEIS Addendum counts measured 991 vph (includes both directions of travel) for this same location in August 2019 (September 2020 TENW Transportation Report Appendix J, Figure 4). In further comparison, TENW's recent Revised 47 North SEIS Addendum (March 9, 2023) measured 749 vph at this location on Sunday, June 26, 2022. It seems unusual that a Sunday PM peak hour count in June 2022, would be 15% higher than Labor Day weekend that same year? While the same location was 52% higher in August 2019.

With notable differences in measured traffic volumes, we feel it is prudent to further monitor the experienced traffic volumes, and trust Kittitas County shares this assessment. To expand on the data available to us, the City has subscribed to StreetLight InSight, a traffic planning platform that presents vehicle counts, origin/destination, and the ability to evaluate years, months, days, and hours, for segments all over upper Kittitas County. The City will extend one of its five subscription seats to Kittitas County Public Works, as we work together on regional transportation planning.

We look forward to continued collaboration on these topics, and to the next Suncadia Traffic Monitoring Report update.

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Date: November 7, 2023

To: Kittitas County Commissioners

From: Mayor Jay McGowan

With Copies To: Mark Cook, Kittitas County Public Works Director

Subject: Suncadia Master Planned Resort
2023 Traffic Monitoring Report

Thank you for the opportunity to review and comment on the recently completed Traffic Monitoring Report for the Suncadia Master Planned Resort (MPR), dated October 9, 2023. The City is pleased to see that the monitoring of traffic impacts continues and that the three previously missing City intersections were included in this report. We look forward to our ongoing discussions on how best to apportion traffic impacts among development activities within the City limits and the unincorporated County.

Unfortunately, the City would like to express our concerns regarding the incomplete data collection efforts, specifically related to the collection period and methodology, that are inconsistent with the Suncadia MPR Conditions of Approval (COA), specifically Item C-17 Monitoring Program, December 2, 2008.

1. The limited data collection period from Friday, September 1, 2023, through Sunday, September 3, 2023, fails to encompass the entire Labor Day weekend, contrary to the previous study conducted between August 26, 2022, and September 6, 2022. It is crucial to note that the prior study accounted for the actual Labor Day, which is a significant period for assessing traffic flow accurately. As per the MPR COA, the monitoring period is expected to include "Labor Day weekend and the week and weekend prior to Labor Day". The exclusion of Labor Day itself raises questions about the comprehensive nature of the 2023 data collection efforts, and as a result, fails to provide meaningful information, that can be compared to prior years.
2. The gravely limited intersection counts collected on just Saturday, September 2, 2023, from 3 pm to 6 pm, fail to provide a complete understanding of traffic patterns during the Labor Day weekend. Again, the MPR COA specifies a more extensive monitoring period, the "Labor Day weekend and the week and weekend prior to Labor Day". In addition to a complete assessment of intersections, this provides for an accurate evaluation of traffic volumes generated by the Roslyn/Cle Elum school campus. The restricted data

collection efforts on a single day, Saturday, and only during a three-hour period limits the scope of the assessment and fails to provide meaningful information, that can be compared to prior years.

3. The exclusion of Monday, Labor Day, from the data collection for Table 1 and Table 2, which previously included an average count for the entire weekend, leads to a skewed representation of the traffic flow during the holiday period. Not considering the traffic on Labor Day, especially when most tourists are leaving the upper Kittitas County area, significantly impacts the analysis and conclusions drawn from the data. The negative growth rate at the I-90 WB on-ramp Bullfrog location is likely a consequence of this omission and may not accurately represent the true traffic trends.
4. Table 8 highlights the Level of Service (LOS) at the school driveways, where the middle driveway has consistently operated at LOS E in the morning and LOS D in the afternoon, as indicated in both 2022 and 2023. The lack of any mention of improvements to rectify this deficiency raises concerns about the effectiveness of the monitoring program in addressing critical traffic issues.

The aforementioned inconsistencies and omissions in the 2022 and 2023 data collection process render the comparison with previous data inequitable. We provided our concerns from the 2022 monitoring in a letter dated June 26, 2023, and hoped that the County would require Suncadia to adequately address the deficiencies of monitoring and reporting moving forward, (see attached). We strongly urge the Kittitas County Public Works Department to address these concerns and ensure that future data collection efforts adhere strictly to the requirements outlined in the MPR COA. An accurate assessment of traffic conditions is vital for the implementation of effective traffic management strategies in the Kittitas County area.

Thank you for your attention to this matter. We look forward to your prompt action and response.



Mayor Jay McGowan

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Based on conclusions above it can be assumed that the traffic impacts of future MPR development to the local road network will be within the forecasted thresholds established in the MPR-FEIS.

Overall, the MPR is not generating excessive parking impacts in Roslyn and Cle Elum.

We ask that the report be amended or an addendum prepared that removes these conclusions or explains that they are preliminary findings subject to further review and analysis.

5. The report notes that there will be significant reductions in the projected buildout at Suncadia. This is speculative and is not consistent with our understanding of what is being discussed by the County and New Suncadia. The report also speculates, with no support, that Suncadia's future growth will be consistent with conditions forecasted in 2000.

We ask that the report be amended or an addendum prepared to include the information provided by New Suncadia that provides the basis for the following statement in the 2023 Report:

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We look forward to continued collaboration on these topics, and to the next Suncadia Traffic Monitoring Report update.