



September 12, 2022

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

Attn: Dan Carlson, Director
Kelly Bacon, Planner 1

Subject: Proposed Comprehensive Plan Amendment (CP-22-00005), Rezone Application (RZ-22-00005) and Preliminary SEPA Determination of Non-Significance for Mardee Lake Inc.

The Washington Department of Transportation (WSDOT) has reviewed the application materials for the proposed Comprehensive Plan, Rezone and preliminary SEPA Determination for the Mardee Lake development adjacent to Interstate 90 (I-90) near Exit 54 and State Route 906 and are submitting the following comments.

The application proposes to change four parcels totaling 150.98 acres from Rural Working to Rural Recreation plan designation and from Forest and Range to Rural Recreation zoning designation. The Kittitas County’s Zoning Code allows two options for minimum lot size and maximum density allowance for the Rural Recreation zone:

1. One unit per five (5) acres, unless within a cluster plat
2. For lots in cluster plats, the minimum lot size is one half (½) acre with the ability to increase the density from one (1) unit per five (5) acres to 0.4 units per acre (equates to 1 unit per 2 acres) or 2 units per 5 acres per KCC 17.30.430.

Based on the above and our interpretation of the density allowances, the following potential number of lots and additional average vehicle trips (AADT) may result:

Density	Number of Potential Lots	Average Daily Trips per single family dwelling <i>(9.43 ADT per unit; 1.0 peak PM*)</i>	Average Daily Trips per recreational home <i>(3.55 ADT per unit; .32 peak PM*)</i>
1 unit per 20 acres	Existing four lots	37; 37	14.2; 12.8
1 unit per 20 acres	3 additional	28; 28	10; 3
1 unit per 5 acres	26 additional	245; 245	92; 29
2 units per 5 acres	56 additional	528; 528	198; 63
0.4 units per acre (equals 1 unit per 2 acres)	296 additional	2,791; 2,791	1,050; 336

**Based on Institute of Traffic Engineers Manual*

Under the proposed new zoning, full buildout of future development is estimated to increase the additional AADT for weekdays to between 245 and 2,791 depending on density allowed and developed. This represents a potential significant increase to weekday AADT.

We believe the density and location of associated future development 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 will ultimately improve 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. These land use issues warrant 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.

Based on the above, we believe the Determination of Non-Significance issued for this proposal is not sufficient to adequately address potential impacts, including ecological connectivity investments. This is based on the following:

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.

Although the application is a non-project action, disclosure of potential impacts to capital facilities should be identified at this application. The existing Exit 54 interchange ramp terminal (stop sign)

may not be adequate for additional traffic and needs further review. A Traffic Impact Analysis is warranted for this proposal.

Identifying potential impacts to ecological connectivity in the Gold Creek valley is needed to ensure that public investments and commitments are maintained.

The following comments are informational and apply to future 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 access restrictions 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.

A traffic impact analysis (TIA) should be required as part of future development applications for the property.

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Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding our comments, please contact Debi Freudenthal at (509) 577-1633.

Sincerely,

Debra Freudenthal

Debi Freudenthal for

Paul Gonseth, P.E.
Planning Engineer

PG: mrr/mn/df
cc: Troy Suing, SCR Asst. Regional Administrator -Program Management
Brian White, SCR Asst. Regional Administrator – Project Development
Mike Krahenbuhl, WSDOT Area 1 Maintenance Superintendent
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