

From: [Aren Orsen \(HSY\)](#)
To: [Kelly Bacon \(CD\)](#)
Cc: [Guy Moura \(HSY\)](#); sydney.hanson@dahp.wa.gov
Subject: CCT Comments RE: LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek
Date: Thursday, August 26, 2021 4:41:36 PM
Attachments: [CCT COMMENTS Suncadia Tumble Creek LP2100002_082621.pdf](#)

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Dear Kelly Bacon,

Please see the attached letter with CCT comments regarding LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek. Please feel free to contact me with any questions or concerns.

Thank you,

Aren Orsen
CCT History/Archaeology
Archaeologist II
Aren.Orsen.HSY@colvilletribes.com
509-978-9064





The Confederated Tribes of the Colville Reservation

History/Archaeology Program
P.O. Box 150, Nespelem, WA 99155

(509) 634-2693
FAX: (509) 634-2694



August 26, 2021

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

RE: Suncadia Phase 3 Division 17 Tumble Creek LP-21-00002

Dear Kelly Bacon,

Thank you for consulting with the Confederated Tribes of the Colville Reservation (CCT). Please be advised that the proposed undertaking lies within the traditional territories of the Wenatchi Tribe, one of twelve constituent tribes of the Confederated Tribes of the Colville Reservation (Colville Confederated Tribes [CCT]), which is governed by the Colville Business Council (CBC). The CBC has delegated to the Tribal Historic Preservation Officer (THPO) the responsibility of representing the CCT with regard to cultural resources management issues throughout the traditional territories of all of the constituent tribes under Resolution 1996-29. This area includes parts of eastern Washington, northeastern Oregon, the Palus (Palouse) territory in Idaho, and south central British Columbia.

The applicant's answers to Section B.13(a-d) of the provided SEPA checklist provide references to the original DEIS and FEIS, as well as the Suncadia MPR Conditions of Approval sections C-21 to C-23. These sections appear to be based on recommendations made during the original cultural resource survey effort for the MountainStar Resort in 1998 (Griffin and Churchill).

-We consider the scope, methods, results, and recommendations of the 1998 cultural resources survey to be woefully inadequate as a means of determining the current proposed projects' impacts on cultural resources. This survey did not include any subsurface testing. The authors noted that "Additional resource areas undoubtedly exist within the MountainStar Resort but, due to poor ground visibility throughout the resort area, have not been identified..." The CCT does not consider such a survey to be adequate for identifying cultural resources for a project with ground disturbing activities, much less as the basis for the Suncadia MPR Conditions of Approval, and subsequent Determinations of Non-Significance.

-The SEPA checklist for this project refers to sections C-21 through C-23 of the MPR Conditions of Approval as the methods to be used to assess potential impacts to resources. Section C-23 requires subsurface testing "within identified cultural constraint areas..." only. To the best of my knowledge, these "cultural constraint areas" were identified by the 1998 effort that did not include any subsurface testing and explicitly described the likelihood of additional unidentified resources. We do not believe that sufficient information currently exists to adequately answer questions B.13.(a-d) of the SEPA checklist.

-In short, the entirety of the MPR Conditions of Approval rely on a twenty-two year old cultural resource survey that explicitly details its own inadequacy, does not meet current DAHP standards, and was not conducted with the proposed project in mind. We do not consider this to be a solid basis for permitting Suncadia projects.

-The CCT are not mentioned in any of these documents as an affected tribe, despite the project area being squarely in the traditional territory of the Wenatchi Tribe. To my knowledge, the CCT were not a party to and were not consulted with regarding the Suncadia MPR Conditions of Approval, despite the project area being squarely in the traditional territory of the Wenatchi Tribe. Our recommendations and concerns are not bound by an agreement we were not included in drafting.

-We recommend a full cultural resource survey, inclusive of subsurface testing, be conducted of the entire project area, prior to any permitting or Determination of Significance. The CCT should be consulted with on the results of this survey. This survey and subsequent reporting should meet DAHP's Standards for Cultural Resource Reporting.

-The permitting process for this project seems to follow the trajectory of other Suncadia Divisions (i.e. Phase 2 Division 1 (LP-20-0003)). In effect, this is resulting in Suncadia projects being allowed to move forward without cultural resource investigations that would otherwise be considered standard practice. The CCT's recommendations and concerns set forth regarding this project are likely to be repeated for any subsequent Divisions if this does not change. We recommend consultation between your office, the CCT, DAHP, and other affected Tribes occur to affect revisions to the Suncadia MPR Conditions of Approval.

Thank you for consulting with the Confederated Tribes of the Colville Reservation. Please note that these comments are based on information available to us at the time of the project review. We reserve the right to revise our comments as information becomes available. If you have any questions or concerns, please contact me at (509)-978-9064. If you would like to speak with the THPO, please contact Guy Moura at (509)-634-2695 or guy.moura@colvilletribes.com.

Sincerely,

Aren Orsen
CCT History/Archaeology
Archaeologist II
Aren.Orsen.HSY@colvilletribes.com
509-978-9064

From: [Hanson, Sydney \(DAHP\)](#)
To: [Kelly Bacon \(CD\)](#)
Cc: [Wollwage, Lance \(DAHP\)](#); ["Guy Moura \(HSY\)"](#); ["Aren Orsen \(HSY\)"](#); ["steve@snoqualmtribe.us"](#); [Casey Barney](#); [Corrine Camuso](#); [Gregg Kiona](#); [Jessica Lally](#); [Kate Valdez](#); [Noah Oliver](#)
Subject: Kittitas County_Suncadia Ph. 3 Div. 17 Tumble Creek (LP-21-00002)_Survey Highly Advised; Permit Potentially Required (DAHP Project Tracking # 2021-09-06109)
Date: Wednesday, September 8, 2021 12:31:03 PM
Attachments: [2021-09-06109_090821_Survey Highly Advised Permit Potentially Required.pdf](#)

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Hi Kelly,

Attached is our letter regarding the project referenced in the subject line. Please contact me with any questions.

All the best,

Sydney Hanson, MA (she/her) | **Transportation Archaeologist**
360.280.7563 (cell) | sydney.hanson@dahp.wa.gov

Department of Archaeology & Historic Preservation | www.dahp.wa.gov
1110 Capitol Way S, Suite 30 | Olympia WA 98501
PO Box 48343 | Olympia WA 98504-8343

My schedule: M-F 7:00 AM – 3:30 PM

Please consider the environment before printing this email



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

September 8, 2021

Kelly Bacon
Planner I
Kittitas County
411 Ruby St. Suite 2
Ellensburg, WA 98926

In future correspondence please refer to:
Project Tracking Code: 2021-09-06109
Property: Kittitas County_Suncadia Ph. 3 Div. 17 Tumble Creek (LP-21-00002)
Re: Survey Highly Advised; Permit Potentially Required

Dear Kelly Bacon:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP) and providing documentation regarding the above referenced project. These comments are based on the information available at the time of this review and on behalf of the SHPO in conformance Washington State law. Should additional information become available, our assessment may be revised. Please review our comments below:

- DAHP agrees with all comments provided in the 26 August 2021 letter from Aren Orsen, Archaeologist II with the CCT History/Archaeology Program.
- The boundary testing of site 45KT1363 by CWU, while appreciated, is not adequate for the scale of the project. An archaeological survey with subsurface testing across the entire project area is highly advised. A report meeting DAHP's [Standards for Cultural Resource Reporting](#) should be produced to accompany the survey.
- If any work within the boundary of 45KT1363 is proposed, a site alteration permit from DAHP will be required. Please contact Lance Wollwage, Assistant State Archaeologist, with any questions about the permitting process.
- We recommend that any historic buildings or structures (45 years in age or older) located within the project area are evaluated for eligibility for listing in the National Register of Historic Places on Historic Property Inventory (HPI) forms. We highly encourage the SEPA lead agency to ensure that these evaluations are written by a cultural resource professional meeting the [SOI Professional Qualification Standards in Architectural History](#).

Please note that the recommendations provided in this letter reflect only the opinions of DAHP. Any interested Tribes may have different recommendations. We appreciate receiving any correspondence or comments from Tribes or other parties concerning cultural resource issues that you receive.

Thank you for the opportunity to comment on this project. Please ensure that the DAHP Project Tracking Number is shared with any hired cultural resource consultants and is attached to any



communications or submitted reports. Please also ensure that any reports, site forms, and/or historic property inventory (HPI) forms are uploaded to WISAARD by the consultant(s).

Should you have any questions, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Sydney Hanson". The signature is fluid and cursive, with a long horizontal line extending to the right.

Sydney Hanson
Transportation Archaeologist
(360) 280-7563
Sydney.Hanson@dahp.wa.gov



From: [ECY RE CRO SEPA Coordinator](#)
To: [Kelly Bacon \(CD\)](#)
Subject: 202104674 Comments for LP-21-00002
Date: Thursday, September 9, 2021 4:11:42 PM
Attachments: [202104674 New Suncadia LLC Ph 3 Div 17 Tumble Creek.pdf](#)
Importance: High

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Please see the attached comment letter for the Suncadia Phase 3 Division 17 Tumble Creek subdivision.

Please share these comments with the applicant.
Thank you,

Gwen Clear
WA State Dept. of Ecology
Regional Environmental Review Coordinator
1250 W. Alder Street
Union Gap, WA 98903-0009
(509) 575-2012
crosepa@ecy.wa.gov



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

1250 West Alder Street • Union Gap, Washington 98903-0009 • (509) 575-2490

September 9, 2021

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

Re: SEPA Register 202104674, LP-21-00002

Dear Kelly Bacon:

Thank you for the opportunity to comment on the Notice of Application for the Suncadia Phase 3 Division 17 Tumble Creek subdivision, proposed by New Suncadia, LLC. The Department of Ecology (Ecology) has reviewed the application and has the following comments.

WATER QUALITY

Project with Potential to Discharge Off-Site

The NPDES Construction Stormwater General Permit from the Washington State Department of Ecology is required if there is a potential for stormwater discharge from a construction site with disturbed ground. This permit requires that the SEPA checklist fully disclose anticipated activities including building, road construction and utility placements. Obtaining a permit may take 38-60 days.

The permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) shall be prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water and storm drains by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.

More information on the stormwater program may be found on Ecology's stormwater website at: <http://www.ecy.wa.gov/programs/wq/stormwater/construction/>. Please submit an application or contact **Wendy Neet** at the Dept. of Ecology, (509) 454-7277 or email wendy.neet@ecy.wa.gov, with questions about this permit.

Sincerely,

A handwritten signature in blue ink that reads "Gwen Clear".

Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012
crosepa@ecy.wa.gov

From: [Mau, Russell E \(DOH\)](#)
To: [Kelly Bacon \(CD\)](#)
Cc: [DOH EPH DW ERO ADMIN](#); [Smits, Brenda M \(DOH\)](#); [Holly Erdman](#)
Subject: RE: LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek - Notice of Application; Suncadia Resort, AA317E, Kittitas County
Date: Friday, August 27, 2021 8:09:46 AM

CAUTION: This email originated from outside the Kittitas County network. Do not click links, open attachments, fulfill requests, or follow guidance unless you recognize the sender and have verified the content is safe.

Kelly:

The Department of Health (DOH) Office of Drinking Water (ODW) has the same type of comment for this Suncadia proposal as for other, recent Suncadia development proposals:

- Over the past couple years, Suncadia has submitted a large number of additional connections that are all in various stages of development and construction – DOH needs Suncadia to submit documentation accounting for existing and ALL proposed connections, so that DOH ODW can confirm sufficient water system capacity.

If you have any questions or concerns, please contact DOH.

Thanks,

Russell E. Mau, PhD, PE

Regional Engineer

Office of Drinking Water

Washington State Department of Health

16201 East Indiana Avenue, Suite 1500, Spokane Valley, WA 99216

Russell.Mau@doh.wa.gov

509-329-2116 | www.doh.wa.gov

From: Kelly Bacon (CD) <kelly.bacon.cd@co.kittitas.wa.us>

Sent: Thursday, August 26, 2021 8:40 AM

To: Pat Nicholson <pat.nicholson@co.kittitas.wa.us>; Ryan McAllister <ryan.mcallister@co.kittitas.wa.us>; Kim Dawson <kim.dawson@co.kittitas.wa.us>; George Long <long@kittcom.org>; Julie Kjorsvik <julie.kjorsvik@co.kittitas.wa.us>; Toni Berkshire <toni.berkshire@co.kittitas.wa.us>; Jesse Cox <jesse.cox@co.kittitas.wa.us>; Holly Erdman <Holly.erdman@co.kittitas.wa.us>; Lisa Lawrence <lisa.lawrence@co.kittitas.wa.us>; Patti Stacey <patti.stacey@co.kittitas.wa.us>; Candie Leader <candie.leader@co.kittitas.wa.us>; Yakama Nation - Environmental Review <enviroreview@yakama.com>; Corrine Camuso <Corrine_Camuso@Yakama.com>; Jessica Lally <Jessica_Lally@Yakama.com>; 'Noah Oliver'

<Noah_Oliver@yakama.com>; Casey Barney <Casey_Barney@Yakama.com>; kozj@yakamafish-nsn.gov; matj@yakamafish-nsn.gov; barh@yakamafish-nsn.gov; Clear, Gwen (ECY) <GCLE461@ECY.WA.GOV>; White, Lori (ECY) <lowh461@ECY.WA.GOV>; ECY RE Former Orchards <formerorchards@ECY.WA.GOV>; Neet, Wendy (ECY) <wnnee461@ECY.WA.GOV>; Downes, Scott G (DFW) <Scott.Downes@dfw.wa.gov>; Nelson, Jennifer L (DFW) <Jennifer.Nelson@dfw.wa.gov>; Torrey, Elizabeth M (DFW) <Elizabeth.Torrey@dfw.wa.gov>; WS DAHP <sepa@dahp.wa.gov>; James E Brooks Library - Jorgenja <jorgenja@cwu.edu>; James E Brooks Library - Nelmsk <nelmsk@cwu.edu>; Mike Flory <mike.flory@co.kittitas.wa.us>; Jeremy Larson <jeremy.larson@co.kittitas.wa.us>; Steph Mifflin <stephanie.mifflin@co.kittitas.wa.us>; Mau, Russell E (DOH) <Russell.Mau@DOH.WA.GOV>; DNR RE AQ LEASING RIVERS <DNRREAQLEASINGRIVERS@dnr.wa.gov>; Early, Shane (DNR) <Shane.Early@dnr.wa.gov>; DNR RE SEPACENTER <SEPACENTER@dnr.wa.gov>; MAUNEY, MARTY (DNR) <MARTIN.MAUNEY@dnr.wa.gov>; 'Allison Kimball (brooksideconsulting@gmail.com)' <brooksideconsulting@gmail.com>; '(tribune@nkctribune.com)' <tribune@nkctribune.com>; 'terry@nkctribune.com' <terry@nkctribune.com>; Megan Woodruff (mwoodruff@kvnews.com) <mwoodruff@kvnews.com>; 'legals@kvnews.com' <legals@kvnews.com>; 'deborah.j.knaub@usace.army.mil' <deborah.j.knaub@usace.army.mil>; 'lhendrix@usbr.gov' <lhendrix@usbr.gov>; 'mark.a.gradwohl.civ@mail.mil' <mark.a.gradwohl.civ@mail.mil>; 'Kimberly.peacher@navy.mil' <Kimberly.peacher@navy.mil>; Graham, Ken (PARKS) <Ken.Graham@PARKS.WA.GOV>; Mike Engelhart (GOV) <mengelhart@cleelum.gov>; KathiSwanson <kswanson@cleelum.gov>; mhayes@cleelum.gov; VirgilAmick <vamick@cleelum.gov>; CleElumPlanning <planning@cleelum.gov>; Wargo, Gary <wargog@cersd.org>; montgomeryr@cersd.org; 'KVFD 7 OFFICE' <Office@kcf7.com>; 'Guy Moura (HSY)' <Guy.Moura@colvilletribes.com>; 'Aren Orsen (HSY)' <Aren.Orsen.HSY@colvilletribes.com>; sam.rushing@colvilletribes.com; 'kdkistler@bpa.gov' <kdkistler@bpa.gov>; 'klarned@fs.fed.us' <klarned@fs.fed.us>; 'scplanning@wsdot.wa.gov' <scplanning@wsdot.wa.gov>
Cc: lwedin@suncadia.com; Steve Lathrop <Steve@lwhsd.com>; Jeremy Johnston <jeremy.johnston@co.kittitas.wa.us>; Rachael Stevie (CD) <rachael.stevie.cd@co.kittitas.wa.us>; Jeremiah Cromie <jeremiah.cromie@co.kittitas.wa.us>

Subject: LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek - Notice of Application

External Email

Good morning,

CDS is requesting comment on the following Long Plat application LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek. Links to the file materials can be found below. I have attached the Notice of Application along with the SEPA Checklist. Kittitas County anticipates issuing a DNS for this project application and is using the optional SEPA process. The comment period will end **Wednesday, September 13, 2021 at 5pm**. CDS will assume your agency does not wish to provide comment if not received by this date. Links to the file materials can be found below. Please let me know if you have any issues accessing the materials.

[LP-21-00002 Suncadia Ph. 3 Div 17 Tumble Creek Internal](#)

[LP-21-00002 Suncaida Ph 3 Div 17 Tumble Creek External](#)

If the links above do not work, please go to the CDS website at <https://www.co.kittitas.wa.us/cds/land-use/default.aspx> and navigate to “Long Plats” and then the Project File Number “LP-21-00002 Suncadia Ph 3 Div. 17 Tumble Creek”

Thank you,

Kelly Bacon

Planner I

Kittitas County Community Development Services

411 N. Ruby Street, Ste 2

Ellensburg, WA 98926

Office: (509) 962-7539

Kelly.bacon.cd@co.kittitas.wa.us

The information transmitted by this email is intended only for the person or entity to which it is addressed. This email may contain confidential and/or privileged material. If you are not the intended recipient of this message, be aware that any use, review, retransmission, distribution, or reproduction is strictly prohibited. If you received this in error, please contact the sender immediately and delete the material from all devices.

message id: 38eb45916c6dcbdac24bb8719d004a14

Subdivision Comments

To: Kelly Bacon, CDS Planner

From: Jesse Cox, Environmental Health Supervisor
Holly Erdman, Environmental Health Specialist

Date: 09/10/21

RE: LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek

Thank you for the opportunity to comment on the above-mentioned project regarding water and septic requirements to comply with Kittitas County Public Health Department's Water Resources and Environmental Health requirements.

Findings

On Site Sewage

Finding 1

The collected raw wastewater from the development will be conveyed by means of onsite gravity sewer to the existing gravity sewer in Tumble Creek Drive.

Any on-site septic systems that are to be utilized for wastewater management must adhere to the standards set by both the Washington Administrative Code, and Kittitas County Code.

Water

Finding 1

Proposed long plat indicates a Group A community water system will be used. If the intention is to utilize the Suncadia water system the lots added to the system must have the final approval of the Washington State Department of Health, Division of Drinking Water. The applicant must prove legal and physical availability of water for all new uses of water on proposed lots.

A	Additional Information Required (Prior to Preliminary Plat Approval)
----------	---



507 N. Nanum Street, St. 102 · Ellensburg, WA 98926

T: 509.962.7515 · F: 509.962.7581

www.co.kittitas.wa.us/health/

On Site Sewage

Please clarify how the raw wastewater will be conveyed from gravity septic to an existing system in Tumble Creek. Is this system an on-site system? Or is this a connection to the lift station running to a wastewater treatment facility?

Water

Documentation from Suncadia stating they can serve the proposed 80 new, single-family residences as well as meeting the requirements of the Washington State Department of Health and providing what is necessary to maintain a green operating permit status.

B	Final Plat Review & Recording (Prior to Final Plat Approval)
----------	---

No additional information required

C	Final Plat Notes
----------	-------------------------

No additional information required



From: [Candie Leader](#)
To: [Kelly Bacon \(CD\)](#)
Subject: RE: LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek - Notice of Application
Date: Wednesday, September 8, 2021 3:33:59 PM
Attachments: [Suncadia Ph 3 Div 17 Tumble Creek LP-21-00002_09082021.pdf](#)

Please find PW comments attached.

Thanks,

Candie Leader

Administrative Supervisor
Kittitas County Public Works
411 North Ruby Street, Suite 1
Ellensburg, WA 98926
Direct Line: 509-962-7699
Office Line: 509-962-7523

From: Kelly Bacon (CD) <kelly.bacon.cd@co.kittitas.wa.us>
Sent: Thursday, August 26, 2021 8:40 AM
To: Pat Nicholson <pat.nicholson@co.kittitas.wa.us>; Ryan McAllister <ryan.mcallister@co.kittitas.wa.us>; Kim Dawson <kim.dawson@co.kittitas.wa.us>; George Long <long@kittcom.org>; Julie Kjorsvik <julie.kjorsvik@co.kittitas.wa.us>; Toni Berkshire <toni.berkshire@co.kittitas.wa.us>; Jesse Cox <jesse.cox@co.kittitas.wa.us>; Holly Erdman <Holly.erdman@co.kittitas.wa.us>; Lisa Lawrence <lisa.lawrence@co.kittitas.wa.us>; Patti Stacey <patti.stacey@co.kittitas.wa.us>; Candie Leader <candie.leader@co.kittitas.wa.us>; Yakama Nation - Environmental Review <enviroreview@yakama.com>; Corrine Camuso <Corrine_Camuso@Yakama.com>; Jessica Lally <Jessica_Lally@Yakama.com>; 'Noah Oliver' <Noah_Oliver@yakama.com>; Casey Barney <Casey_Barney@Yakama.com>; kozj@yakamafish-nsn.gov; matj@yakamafish-nsn.gov; barh@yakamafish-nsn.gov; DOE - gcle <gcle461@ecy.wa.gov>; DOE - lowh <lowh461@ecy.wa.gov>; 'FormerOrchards@ecy.wa.gov' <FormerOrchards@ecy.wa.gov>; wendy.neet@ecy.wa.gov; WDFW - Scott Downes <scott.downes@dfw.wa.gov>; WDFW - Jennifer Nelson <jennifer.nelson@dfw.wa.gov>; WDFW - Elizabeth Torrey <elizabeth.torrey@dfw.wa.gov>; WS DAHP <sepa@dahp.wa.gov>; James E Brooks Library - Jorgenja <jorgenja@cwu.edu>; James E Brooks Library - Nelmsk <nelmsk@cwu.edu>; Mike Flory <mike.flory@co.kittitas.wa.us>; Jeremy Larson <jeremy.larson@co.kittitas.wa.us>; Steph Mifflin <stephanie.mifflin@co.kittitas.wa.us>; WA State Department of Health - Russell <russell.mau@doh.wa.gov>; 'rivers@dnr.wa.gov' <rivers@dnr.wa.gov>; Early, Shane (DNR) <Shane.Early@dnr.wa.gov>; sepacenter@dnr.wa.gov; MAUNEY, MARTY (DNR) <MARTIN.MAUNEY@dnr.wa.gov>; 'Allison Kimball (brooksideconsulting@gmail.com)' <brooksideconsulting@gmail.com>; '(tribune@nkctribune.com)' <tribune@nkctribune.com>; 'terry@nkctribune.com' <terry@nkctribune.com>; Megan Woodruff (mwoodruff@kvnews.com) <mwoodruff@kvnews.com>; 'legals@kvnews.com' <legals@kvnews.com>; 'deborah.j.knaub@usace.army.mil' <deborah.j.knaub@usace.army.mil>; 'lhendrix@usbr.gov' <lhendrix@usbr.gov>; 'mark.a.gradwohl.civ@mail.mil' <mark.a.gradwohl.civ@mail.mil>; 'Kimberly.peacher@navy.mil' <Kimberly.peacher@navy.mil>; ken.graham@parks.wa.gov; Mike

Engelhart (GOV) <mengelhart@cleelum.gov>; KathiSwanson <kswanson@cleelum.gov>; mhayes@cleelum.gov; VirgilAmick <vamick@cleelum.gov>; CleElumPlanning <planning@cleelum.gov>; wargog@cersd.org; montgomeryr@cersd.org; 'KVFD 7 OFFICE' <Office@kcf7.com>; 'Guy Moura (HSY)' <Guy.Moura@colvilletribes.com>; 'Aren Orsen (HSY)' <Aren.Orsen.HSY@colvilletribes.com>; sam.rushing@colvilletribes.com; 'kdkistler@bpa.gov' <kdkistler@bpa.gov>; 'klarned@fs.fed.us' <klarned@fs.fed.us>; 'scplanning@wsdot.wa.gov' <scplanning@wsdot.wa.gov>

Cc: lwedin@suncadia.com; Steve Lathrop <Steve@lwhsd.com>; Jeremy Johnston <jeremy.johnston@co.kittitas.wa.us>; Rachael Stevie (CD) <rachael.stevie.cd@co.kittitas.wa.us>; Jeremiah Cromie <jeremiah.cromie@co.kittitas.wa.us>

Subject: LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek - Notice of Application

Good morning,

CDS is requesting comment on the following Long Plat application LP-21-00002 Suncadia Phase 3 Division 17 Tumble Creek. Links to the file materials can be found below. I have attached the Notice of Application along with the SEPA Checklist. Kittitas County anticipates issuing a DNS for this project application and is using the optional SEPA process. The comment period will end **Wednesday, September 13, 2021 at 5pm**. CDS will assume your agency does not wish to provide comment if not received by this date. Links to the file materials can be found below. Please let me know if you have any issues accessing the materials.

[LP-21-00002 Suncadia Ph. 3 Div 17 Tumble Creek Internal](#)

[LP-21-00002 Suncaida Ph 3 Div 17 Tumble Creek External](#)

If the links above do not work, please go to the CDS website at <https://www.co.kittitas.wa.us/cds/land-use/default.aspx> and navigate to “Long Plats” and then the Project File Number “LP-21-00002 Suncadia Ph 3 Div. 17 Tumble Creek”

Thank you,

Kelly Bacon

Planner I

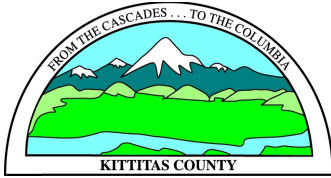
Kittitas County Community Development Services

411 N. Ruby Street, Ste 2

Ellensburg, WA 98926

Office: (509) 962-7539

kelly.bacon.cd@co.kittitas.wa.us



KITTITAS COUNTY

DEPARTMENT OF PUBLIC WORKS

MEMORANDUM

TO: All Staff

FROM: Public Works Plan Review Team

DATE: September 8, 2021

SUBJECT: Suncadia Ph. 3 Div. 17 Tumble Creek LP-21-00002

The following shall be conditions of preliminary approval:

1. Timing of Improvements: Per the Suncadia 2009 Development Agreement section 5.3 Infrastructure, Surety Bonding or Other Assurances. Infrastructure identified by Trendwest in an approved Site Development Plan must be provided and available for use before the issuance of the first certificate of occupancy for Master Planned Resort Accommodation Units included within such plan. For purposes of final plat approval or issuance of building permits, infrastructure may be guaranteed through surety bonding or other financial assurance device acceptable to the County. The estimated costs of providing all such guaranteed infrastructure shall be reviewed and approved by the County Public Works Director or designee. Surety bonding or other acceptable financial device provided to the County shall be in an amount equal to at least 110% of such estimated costs as determined by Trendwest's architects and engineers.

Exhibit F-1 Suncadia MPR Conditions of Approval:

A-2 (a) Required Infrastructure and Utilities, as defined in the Development Agreement, shall be installed and completed or bonded or other financial guaranties or accommodations made for their completion prior to final plat approval of each subphase.

2. Private Road Naming: New Private Road Names will be required to complete a private road naming application prior to final approval.
3. Addressing: Contact the Kittitas County Rural Addressing Coordinator at (509) 962-7523 to obtain addresses prior to obtaining a building permit.
4. Civil Plans: Civil plans will be reviewed and approved as submitted prior to final plat approval in accordance with development agreement.

5. Engineering: The following shall be required prior to final plat approval:

- Please provide a unit inventory of constructed units and available lots for construction for evaluation of shuttle service.
- Please provide an accounting of traffic monitoring.
- Please provide an inventory of equivalent residential units, or the accounting method utilized in the water system plan, affirming sufficient capacity serving the plat.
- Please provide an inventory of equivalent residential units, or the accounting method utilized in the general sewer plan, affirming sufficient capacity serving the plat.



**Washington State
Department of Transportation**

South Central Region
2809 Rudkin Road
Union Gap, WA 98903-1648
509-577-1600 / FAX: 509-577-1603
TTY: 1-800-833-6388
www.wsdot.wa.gov

September 13, 2021

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

Attn: Kelly Bacon, Staff Planner

RE: LP-21-00002 – Suncadia Phase 3 Division 17
I-90 Exit 80 (Bullfrog Rd) vicinity

We have reviewed the proposed project and have the following comment.

The proposed subdivision is part of the Suncadia Master Planned Resort (MPR). We are not opposed to this phase of the MPR, but we are concerned with the cumulative impact this phase and future phases will have on the state highway system. The proponent is required to adhere to the conditions outlined in the MPR Conditions of Approval, specifically condition C-17-Monitoring Program. However, WSDOT has not received an updated monitoring report for review. Prior to plat approval, the proponent should be required to submit an updated traffic monitoring report to the county and WSDOT for review.

Thank you for the opportunity to review and comment on this proposal. If you have any questions regarding this letter, please contact Jacob Prilucik at (509) 225-0637.

Sincerely,

A handwritten signature in cursive script that reads "Paul Gonseth".

Paul Gonseth, P.E.
Region Planning Engineer

PG: jjp

cc: SR 90, File #2021_006



ititamapama

Yakama Nation Cultural Resource Program

Na-Mi-Ta-Man-Wit Nak-Nu-Wit Owt-Nee At-Tow

Confederated Tribes and Bands of the Yakama Nation

Post Office Box 151

Toppenish, WA 98948

Kelly Bacon
Kittitas County
411 Ruby St. Suite 2
Ellensburg, WA 98926

September 13, 2021

Subject: Suncadia Phase 3 Div 17 Tumble Creek (LP-21-00002)

Thank you for contacting the Yakama Nation Cultural Resource Program (CRP) regarding the Suncadia Phase 3 Div 17 Tumble Creek in Kittitas County. The project is located within the Ceded Lands of the Yakama Nation, the legal rights to which were established by the Treaty of 1855 (12 Stat. 951), between the Yakama Nation and the United States Government. The Treaty set forth that the Yakama Nation shall retain the rights to resources upon these lands and, therefore, it is with the assistance and backing of the United States Federal Government that Yakama Nation claims authority to protect traditional resources.

The proposed undertaking lies within the traditional territory of the *Pshwanapam* (Kittitas or Upper Yakama), signatory to the Yakama Treaty and represented by the Confederated Tribes and Bands of the Yakama Nation. Previously recorded site 45KT1363 is within the proposed development area. Yakama Nation CRP met with Suncadia and Central Washington University on May 16, 2019 at 45KT1363 to discuss our concerns. Yakama elders have identified the significance of this site and its association with Yakama Traditional Cultural Properties. While on site, Yakama Nation identified surface artifacts outside of the known site boundaries and recommended re-survey and subsurface testing of the entire proposed area. Subsequent to our field meeting, Suncadia indicated they were not proceeding forward with the proposal and therefore would not seek permitting at 45KT1363.

We are concerned the permit states an intended "reduction of the site buffer". The entirety of 45KT1363 is within a conservation area designated as 'managed open-space'. Archaeological sites are not renewable resources and protected under State Law. 45KT1363 was recommended eligible to the NRHP in 1998 and received concurrence by the Department of Archaeology and Historic Preservation on January 27, 1999. Any disturbances to this site is considered 'knowingly and willingly' – a violation of State Law RCW 27.53 with violators subject to criminal and civil penalties.

It is unclear from the application where the proposed housing phase is in relation to the managed open-space conservation areas. Please have additional information submitted to our program so we can better understand impacts.

The cultural resources investigations should inform the permitting process. The County should ensure compliance with state and federal laws prior to issuing permits. Please contact me at 509-865-5121 ext. 4378 or staff archaeologists if you have questions regarding the above. We look forward to receiving additional information regarding this permit.

Sincerely,

Casey Barney
Cultural Resources Program Manager
Yakama Nation
509-865-5121 ext. 4738