

Ranch at Roslyn Ridge Consolidated Comment List

Final Comments 8-24-2026 0911

Each substantive comment is a separate paragraph prefixed by its commenter. The link under each source heading opens the original letter; the separate working PDF copies link back to this document.

Kittitas County Assessor

Kittitas County Assessor — The parcels are in the land-tax classification of Designated Forest Land.

>>>>Blue Jay Land Company Response: Blue Jay Land Company acknowledges that the proposed non-forest development may require removal of the affected land from Designated Forest Land status. Before commencing a change in use, the Company will work with the Kittitas County Assessor on the applicable removal process, valuation, notice, and tax consequences. RCW 84.33.140 authorizes removal when forestland is no longer primarily devoted to growing and harvesting timber and addresses the resulting compensating-tax process.

Kittitas County Assessor — The proposed use will change the land use and will no longer be compatible with that program; therefore, the classification must be removed.

>>>>Blue Jay Land Company Response: Blue Jay Land Company acknowledges that the Assessor, not the CUP applicant, administers removal from the forestland designation. The Company will not represent that CUP approval alone completes removal; it will obtain and follow the Assessor's written direction before the project changes the designated use. See RCW 84.33.140(5), (10)–(12).

Kittitas County Assessor — The taxpayer may contact the Assessor for an estimated removal cost and to discuss the removal process.

>>>>Blue Jay Land Company Response: Blue Jay Land Company will request an estimated removal cost and written process guidance from the Assessor before any affected phase begins. The Company understands that compensating tax, interest, recording, and timing are determined under RCW 84.33.140 and by the Assessor's statutory administration, rather than by the CUP itself.

City of Roslyn

City of Roslyn — The project appears large enough to exceed the County concurrency-review threshold during the peak summer season.

>>>>Blue Jay Land Company Response: Blue Jay Land Company will submit the County-required transportation concurrency application and supporting information before any phase that triggers review or occupancy. The current traffic exhibit is expressly preliminary and not a Washington professional-engineer-stamped traffic impact analysis; it does not substitute for County review. CUP compatibility must avoid excessive demands on public facilities. RCW 36.70.020(7); KCC 17.60A.015(2), (4).

City of Roslyn — The City reports that all SR 903 traffic funnels through Roslyn on a single narrow two-lane road and that the corridor's future volume and congestion are being studied through the County transportation-model update.

>>>>Blue Jay Land Company: Blue Jay Land Company recognizes this corridor context. It will provide the traffic concurrency information required by Kittitas County for the applicable phase; the County's final decision should identify any project-related traffic mitigation under its adopted standards. KCC 17.60A.015(2), (4); WAC 197-11-660(1).

City of Roslyn — The County should require a concurrency evaluation and traffic-impact study as part of SEPA before issuing a determination, or incorporate the project into the County transportation-model update to evaluate concurrency.

>>>>Blue Jay Land Company Response: Blue Jay Land Company will provide a traffic impact analysis and/or concurrency evaluation if required by Kittitas County or WSDOT through the review process. The scope, assumptions, mitigation, sequencing, and any road or intersection improvements will be established by the responsible agency; no phase will rely on the preliminary traffic narrative as a final concurrency finding. See KCC 17.60A.015(2), (4); SEPA MDNS conditions.

City of Roslyn — The City identifies the County's recently adopted SR 903 transportation-planning policies and asks that the County use its existing development regulations, level-of-service standards, SEPA review, and concurrency procedures to evaluate corridor impacts.

>>>>Blue Jay Land Company Response: Blue Jay agrees that the County should apply its adopted, current standards and policies to the actual proposal. The applicant will supply responsive technical information and will implement any lawful, project-related conditions imposed in the final decision;

preliminary traffic material is not offered as a final level-of-service finding. KCC 17.60A.015(2), (4); WAC 197-11-660(1).

Washington Department of Health (DOH)

Washington Department of Health (DOH) — The applicant states that Evergreen Valley, a Group A public-water system, will serve the development.

>>>>Blue Jay Land Company Response: The application area is represented in the County record as lying within Evergreen Valley Water System's retail service area. Prior to each phase requiring water service or occupancy, Blue Jay will obtain current written service and capacity confirmation from the purveyor and any required approval from the Department of Health; the CUP does not itself create water-system capacity or water rights. See SEPA MDNS conditions; KCC 17.60A.015(2), (4).

Washington Department of Health (DOH) — Evergreen Valley reports 294 existing connections and 411 approved connections.

>>>>Blue Jay Land Company Response: Blue Jay will not treat the reported approved-connection count as a project-specific capacity commitment. It will obtain a current Evergreen Valley availability/capacity letter, identify the proposed connection and demand for the applicable phase, and comply with the water system's and Department of Health's requirements before service or occupancy. See SEPA MDNS conditions and WAC 246-290 (Group A public water systems).

Washington Department of Health (DOH) — As this and Roslyn Ridge West are constructed, the water system will need to diligently identify additional connections and water use.

>>>>Blue Jay Land Company Response: Blue Jay has consulted with Evergreen Valley and will request written water-availability documentation for each CUP phase as required by the County's final conditions. If the system cannot confirm capacity, the applicable phase will not proceed until lawful service and any required approvals are in place. This approach responds to the MDNS condition requiring water-purveyor documentation and applicable water-right and health requirements.

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Henry Fraser

Henry Fraser — The application identifies numerous possible future components over twenty years or more, making meaningful public comment difficult; each future item should require its own permit.

>>>>Blue Jay Land Company Response: Blue Jay requests review of the disclosed guest-ranch components together so that the County can evaluate cumulative, phased impacts. The County—not the applicant—must define the approved scope, duration, and conditions. KCC 17.60A.090 generally voids an uncommenced CUP after five years unless another period is specified and limits extensions; KCC 17.60A.095 requires new review for material changes. Blue Jay will not construct or operate any unapproved component or later expansion without the required County review.

Henry Fraser — The project may create immediate impacts, including increased traffic through Roslyn that could impede emergency egress.

>>>>Blue Jay Land Company Response: Blue Jay will submit the transportation materials required by Kittitas County Public Works and will respond to additional agency requests concerning vehicle trips, emergency access, roadway operations, and mitigation. The final record should tie any transportation condition to identified project impacts and applicable standards. See RCW 36.70.020(7); KCC 17.60A.015(2), (4); WAC 197-11-660(1).

Henry Fraser — The project may contribute to additional consumptive water use up-valley from the agricultural community, which has experienced recent water shortages.

>>>>Blue Jay Land Company Response: Blue Jay recognizes the concern regarding consumptive water use. Water service for each phase will depend on a current written determination from Evergreen Valley and any applicable Department of Health, water-right, and County requirements; CUP approval is not a substitute for those approvals. The applicant will provide the County the requested documentation before occupancy of a phase, consistent with the MDNS conditions and KCC 17.60A.015(2), (4).

Henry Fraser — The County should consider the City of Cle Elum's experience with a past development agreement that lacks much support today.

>>>>Blue Jay Land Company Response: Blue Jay Land Company has no affiliation with the City of Cle Elum development agreement identified by the commenter. That agreement is not a project approval or source of authority for this CUP. The County's decision must rest on the Ranch proposal, the administrative record, and the applicable Kittitas County Code criteria. KCC 17.60A.015.

Henry Fraser — The County may want to refresh the Planning Commission and County planners on the Appearance of Fairness Doctrine.

>>>>Blue Jay Land Company Response: Blue Jay understands that this CUP is processed under the County's CUP procedure and must be decided by the authorized County decision-makers on the record. The Company will participate through the noticed process and will disclose material project information. The County must apply its adopted CUP criteria, not an ad hoc standard. RCW 36.70.020(7); KCC 17.60A.015.

Henry Fraser — If the CUP notice was published in the Tribune, the commenter did not see it and questions whether publication was appropriate.

>>>>Blue Jay Land Company Response: Blue Jay relies on the County's official notice and service record, rather than its own notice determination. The County's notice of application states the comment period and the next hearing step; Blue Jay will support any reasonable request to place the official notice, affidavit, posting, and mailing materials in the record. See chapter 36.70B RCW and KCC Title 15A.

Kittitas County Public Works

Kittitas County Public Works — An approved access permit is required before creating a new driveway access or working in County road right-of-way.

>>>>Blue Jay Land Company Response: Blue Jay will obtain every required County access permit before creating or modifying a driveway connection or performing work in County right-of-way. CUP approval will not be treated as an access permit. Any access design, sight-distance, drainage, construction, and permit conditions will be controlled by the responsible road agency's approval and the final CUP conditions. KCC 17.60A.015(2), (4).

Kittitas County Public Works — All applicable Kittitas County Road Standards apply to the proposal, and the County states that access is not guaranteed to any existing or created parcel on the application.

>>>>Blue Jay Land Company Response: Blue Jay acknowledges that the CUP does not guarantee access. It will obtain the required County and WSDOT access approvals and will construct or operate only under the responsible agencies' approved designs and conditions. KCC 17.60A.015(2), (4); SEPA MDNS conditions.

Kittitas County Public Works — Private roads serving development lots must be inspected and certified by a licensed engineer for conformance with current Kittitas County Road Standards before final project approval; any performance-guarantee alternative must meet International Fire Code minimums before a building permit.

>>>>Blue Jay Land Company Response: Before final approval or construction requiring it, Blue Jay will provide the licensed-engineer inspection/certification and any performance guarantee required by County road standards. It will also meet the applicable International Fire Code access and turnaround requirements before a building permit or occupancy is issued. These are implementation prerequisites, not matters resolved by the CUP alone.

Kittitas County Public Works — Roads longer than 150 feet require a Fire Apparatus Road Turnaround meeting International Fire Code Appendix D.

>>>>Blue Jay Land Company Response: Blue Jay will design and construct any road longer than 150 feet with the Fire Apparatus Road Turnaround required by the applicable International Fire Code and County review. The final road plans will be submitted for agency review before construction or building-permit issuance.

Kittitas County Public Works — Driveway approaches are maintained by the owner; the County will not maintain the access.

>>>>Blue Jay Land Company Response: Blue Jay acknowledges that driveway approaches and private access facilities remain the owner's responsibility unless and until a public agency formally accepts them. The project will not assume County maintenance of private roads or approaches.

Kittitas County Public Works — The County will not accept private roads for public maintenance unless they meet current County Road Standards and are formally accepted by the BOCC.

>>>>Blue Jay Land Company Response: Blue Jay acknowledges that no private road becomes a County-maintained public road merely through CUP approval. If public acceptance is ever proposed, it will be pursued only through the current County Road Standards and formal Board action; otherwise the roads will remain privately maintained.

Kittitas County Public Works — Grading or filling above 100 cubic yards requires a grading permit; work above 500 cubic yards requires an engineered grading plan unless exempted.

>>>>Blue Jay Land Company Response: Blue Jay will obtain a grading permit when the work meets the applicable volume threshold and will provide an engineered grading plan when required. Construction will also comply with the MDNS erosion-control, stormwater, and dust-control conditions. See KCC Title 14.05 and SEPA MDNS conditions.

Kittitas County Public Works — A Transportation Concurrency application is required.

>>>>Blue Jay Land Company Response: Blue Jay will submit the County transportation concurrency application and will implement any agency-required mitigation before the affected phase proceeds. The County must evaluate the proposal under its adopted standards and may condition the CUP for identified, project-related impacts. KCC 17.60A.015(2), (4); WAC 197-11-660(1).

Kittitas County Public Works — Because the project accesses SR 903, WSDOT may require access review and a traffic-impact analysis; Public Works will coordinate with WSDOT if required.

>>>>Blue Jay Land Company Response: Blue Jay will coordinate with Kittitas County and WSDOT regarding SR 903 access and any required traffic impact analysis. No new SR 903 connection is proposed under the MDNS, and no access work will occur without the responsible agency's written permit or approval. See SEPA MDNS conditions.

Kittitas County Public Works — Public Works reports no survey comments, no water-mitigation or metering comments, and no airport comments on the current application.

>>>>Blue Jay Land Company Response: Blue Jay acknowledges these current no-comment findings. They do not replace any future survey, water, airport, utility, access, or other approval that becomes applicable as a phase is designed or permitted.

Kittitas County Public Works — The project area is not within a FEMA-mapped special flood-hazard area, and the County states that flood permitting is not required for the proposed development under the current FIRMs.

>>>>Blue Jay Land Company Response: Blue Jay notes the County's current FIRM finding. This does not waive compliance if final design, site conditions, mapped data, or another agency's jurisdiction creates a floodplain or drainage requirement; the project will comply with all applicable final conditions and permits.

Kittitas PUD

Kittitas PUD — The Kittitas PUD has no comments because the project is at least five miles west of PUD facilities.

Central Cascades Forest LLC / The Nature Conservancy

Central Cascades Forest LLC / The Nature Conservancy — Project approvals should preserve existing legal access rights via Ridgecrest Road and not impair access to adjacent CCF lands.

>>>>Blue Jay Land Company Response: Blue Jay's CUP application does not seek to extinguish, relocate, or impair any valid legal access right serving Central Cascades Forest LLC or The Nature Conservancy. The final project design will respect recorded rights and any applicable agency conditions. The CUP process does not adjudicate private title or easement rights; Blue Jay will address any verified private-right issue through the appropriate recorded instrument or agreement.

Note: Blue Jay Land Company has discussed access concerns with Central Cascades Forest LLC and The Nature Conservancy and has agreed to work collaboratively with them to identify and resolve any access-related issues that may arise.

Central Cascades Forest LLC / The Nature Conservancy — CCF states that its access concerns relate to forest management, stewardship, conservation, fire protection, and related activities on immediately adjacent north-side forestland.

>>>>Blue Jay Land Company Response: Blue Jay recognizes the stated operational purposes of CCF's access. It will not use the CUP as authority to impair any valid recorded access right and will coordinate on verified access concerns within its control. The final decision should preserve lawful access while limiting conditions to identified project impacts. KCC 17.60A.015(4); WAC 197-11-660(1).

Note: Blue Jay Land Company has discussed access concerns with Central Cascades Forest LLC and The Nature Conservancy and has agreed to work collaboratively with them to identify and resolve any access-related issues that may arise.

Central Cascades Forest LLC / The Nature Conservancy — Existing Ridgecrest Road easement-alignment issues with adjoining projects should be promptly resolved, including recorded easement amendments or other instruments if necessary to preserve legal access.

>>>>Blue Jay Land Company Response: Blue Jay will review any specific recorded-easement or alignment information supplied by Central Cascades Forest LLC or The Nature Conservancy and will cooperate in good faith to avoid impairment of established access. The Company does not concede an unverified defect, but it will not rely on CUP approval as authority to alter a legal easement. Any recorded amendment would require the parties with authority to grant it.

Note: Blue Jay Land Company has discussed access concerns with Central Cascades Forest LLC and The Nature Conservancy and has agreed to work collaboratively with them to identify and resolve any access-related issues that may arise.

Central Cascades Forest LLC / The Nature Conservancy — The County should address increased unauthorized motorized access onto neighboring forest and conservation lands.

>>>>Blue Jay Land Company Response: Blue Jay will not authorize motorized access onto neighboring forest or conservation land. Within the project area, it will use site-appropriate guest information, wayfinding, and management practices to discourage trespass; it cannot regulate land it does not own or control. Any condition should be tailored to identified project impacts and lawful jurisdiction. WAC 197-11-660(1).

Note: Blue Jay Land Company has discussed these concerns with Central Cascades Forest LLC and The Nature Conservancy. There seems to be a misunderstanding about the activities included within the boundaries of the proposed Conditional Use application. There is concerned that the proposed Conditional Use application will provide a motorized track within the boundaries of the proposed Conditional Use application which is not included within the application. There will be no motorized track within the boundaries of the proposed Conditional Use application.

Central Cascades Forest LLC / The Nature Conservancy — The County should evaluate measures to protect access rights, avoid impairment of easements, minimize trespass, and ensure road design, signage, barriers, and access-management measures address trespass concerns.

>>>>Blue Jay Land Company Response: Blue Jay will preserve valid access rights, avoid project design that impairs recorded easements, and coordinate with neighboring owners on verified access concerns. It will implement on-site signage, guest orientation, and access-management measures within the proposed conditional use boundaries to discourage trespass, while recognizing that it cannot impose barriers on or controls on land it does not own. Final road design will be subject to County and, where applicable,

WSDOT review; any mitigation condition should identify the affected impact, governing policy, and responsible party. WAC 197-11-660(1); KCC 17.60A.015(4).

Kittitas County Public Health

Kittitas County Public Health — For drinking-water questions, contact DOH Office of Drinking Water.

>>>>Blue Jay Land Company Response: Blue Jay will coordinate drinking-water service with Evergreen Valley and the Department of Health, which administers the relevant Group A public-water requirements. Before a phase is occupied, Blue Jay will provide the County the current service/capacity documentation required by the MDNS and final CUP conditions; it does not represent that a preliminary statement establishes future capacity. WAC 246-290; SEPA MDNS conditions.

Kittitas County Public Health — For wastewater questions, contact the Environmental Health and Safety LOSS Program.

>>>>Blue Jay Land Company Response: Blue Jay will submit each proposed wastewater or RV-dump-station component to the County Environmental Health and Safety LOSS Program and any other responsible authority for the permits, engineering, operation, and disposal approvals that apply. The Company will not install or operate a dump station, on-site sewage system, or sewer connection until the responsible agency approves it. This response is subject to the final project design and applicable health standards.

Kittitas County Public Health — If the Lodge offers dining services, a plan-review permit and food-service permit will be required.

>>>>Blue Jay Land Company Response: If dining or food service is proposed, Blue Jay will first obtain the required plan-review approval and food-service permit from the responsible public-health authority and will comply with the applicable food-code, water, wastewater, and inspection requirements. No food-service operation will begin solely because the CUP permits a lodge use.

Washington Department of Fish and Wildlife (WDFW)

Note: The land within the Ranch at Roslyn Ridge conditional use permit boundary is not an undisturbed landscape. The property and surrounding area have a long history of mining, timber-related activity, and associated industrial use. By the early twentieth century, the project area was the site of Patrick's Mine, which operated until 1961. Remnants of that history remain visible today, including piles of washed mine

rock and other coal-mining material, former railroad grades, mining-era roads and trails, surface-mining cuts, and remnants of supporting mine facilities.

The attached 1954 aerial photograph identifies Patrick's Mine, the conditional use permit area, and nearby surface-mining areas. Patrick's Mine - 1954_NJ_9N_002.pdf Additional historical information is provided in the attached mining-history exhibit. The Ranch at Roslyn Ridge - History 6-11-2026 1312.pdf

Following the closure of Patrick's Mine, portions of the surrounding landscape transitioned to recreational use. Lands north and west of the conditional use permit boundary contain old roads, railroad grades, and trails that are now used for recreation. The proposed conditional use permit is limited to the land, facilities, and activities identified within the application boundary. It is not intended to manage, control, or restrict recreational access to lands outside that boundary.

Within the conditional use permit area, the proposal is intended to reclaim and adapt portions of this historically industrial land for managed recreational use. A recreation management plan will address the lands, trails, facilities, and recreational activities located within the conditional use permit boundary.

This historical context is not intended to discount existing wildlife habitat or applicable critical-area protections. Rather, it is provided so that WDFW, the County, and other reviewers can evaluate the proposal based on the property's actual history, existing conditions, and the defined scope of the application. WDFW's letter itself acknowledges that most of the proposed conditional use area is already "somewhat disturbed habitat."

Washington Department of Fish and Wildlife (WDFW) — Provide additional details regarding the proposed culvert and ditch cleaning to determine whether a Hydraulic Project Approval is required.

>>>>Blue Jay Land Company Response: Before any culvert installation, ditch cleaning, or other work that may affect state waters, Blue Jay will provide WDFW the project details needed to determine whether a Hydraulic Project Approval is required and will obtain every required approval before work begins. The Company will follow the resulting permit conditions and will redesign or defer work if approval is not obtained. Chapter 77.55 RCW.

Washington Department of Fish and Wildlife (WDFW) — WDFW identifies a potential new culvert and ditch cleaning involving up to 2,000 cubic yards near streams or ditches and requests sufficient project detail to determine Hydraulic Project Approval requirements.

>>>>Blue Jay Land Company Response: Blue Jay will provide WDFW and the County a defined scope, location, method, and quantities for any culvert or ditch work before it proceeds. It will obtain an HPA if required and comply with its conditions. CUP approval will not substitute for chapter 77.55 RCW authorization.

Washington Department of Fish and Wildlife (WDFW) — Conduct a site visit to confirm stream typing and watercourse locations before approval, and apply existing riparian-management-zone protection to all watercourses.

>>>>Blue Jay Land Company Response: Blue Jay has requested an on-site review with WDFW and will coordinate a site visit with WDFW and the County, subject to agency scheduling and confirmation. Before approval or ground disturbance affecting a watercourse, the applicant will provide the information necessary to confirm stream typing, watercourse locations, buffers, and required protection measures. The project will comply with KCC Title 17A and the final SEPA/CUP conditions.

Washington Department of Fish and Wildlife (WDFW) — WDFW reports that the submitted stream mapping does not match the DNR stream layer or Kittitas County Compass map and requests protection of every watercourse under Critical Areas Ordinance Table 17A.04.030.6.

>>>>Blue Jay Land Company Response: Blue Jay will reconcile the mapping through field review and County/WDFW coordination before work affecting a watercourse. If a watercourse is verified, the project will follow the applicable KCC Title 17A buffer and protection requirements and the final SEPA/CUP conditions.

Washington Department of Fish and Wildlife (WDFW) — Complete a critical-areas report by a qualified professional before a SEPA determination, including Fish and Wildlife Habitat Conservation Areas and associated impacts and mitigation.

>>>>Blue Jay Land Company Response: A mapped-screening review is not a substitute for a site-specific critical-areas determination when the County's review, field conditions, or agency comments identify a potential critical area. Blue Jay will provide a qualified-professional critical-areas report if required by KCC Title 17A or the County's SEPA/CUP review, and will avoid or mitigate verified impacts through the adopted process. The final decision should state any required report, buffer, mitigation, and monitoring conditions. KCC 17A; WAC 197-11-660(1).

Washington Department of Fish and Wildlife (WDFW) — WDFW states that the draft MDNS identifies only National Wetland Inventory-mapped streams as critical areas and identifies public PHS information concerning elk winter concentration, historic northern spotted owls, and several bat species; it requests analysis of impacts and mitigation before the decision is finalized.

>>>>Blue Jay Land Company Response: Blue Jay will provide a qualified-professional critical-areas analysis if required by KCC Title 17A, addressing verified habitat information, potential impacts, avoidance, mitigation, and monitoring. KCC Title 17A; WAC 197-11-660(1).

Washington Department of Fish and Wildlife (WDFW) — Consult and collaborate with WDFW on wildlife-viewing-area planning, design, and approval.

>>>>Blue Jay Land Company Response: Blue Jay will consult with WDFW and the County on any wildlife-viewing feature proposed within the CUP boundary. If agency review identifies unresolved habitat, safety, access, or management issues, the feature will be redesigned, conditioned, deferred, or removed rather than treated as independently approved. Any final condition should be tied to identified impacts and applicable code. KCC 17A; WAC 197-11-660(1).

Washington Department of Fish and Wildlife (WDFW) — Include the northern portion of parcel 682534 in review if its trail network will be improved, accessed, or advertised as part of the Guest Ranch.

>>>>Blue Jay Land Company Response: The northern portion of parcel 682534 lies outside the stated CUP boundary. Blue Jay will not represent outside land as a Ranch amenity, trail, or guest-access area unless it has lawful access, all required approvals, and the County has reviewed the resulting scope. Marketing and guest materials will identify only authorized areas and will discourage entry onto land not open to the public.

Washington Department of Fish and Wildlife (WDFW) — WDFW states that the potential year-round motorized use of the northern parcel area may compromise wildlife connectivity and habitat if that trail network is improved, accessed, or marketed as part of the Guest Ranch.

Blue Jay Land Company Response: The conditional use application applies specifically to the property within the boundaries identified in the application. The lands within and adjacent to the application area, particularly to the north and west, were historically used for coal mining. Please see the attached 1954 aerial photograph of the Patrick's Mine area, a portion of which lies within the conditional use boundaries, as well as the attached brief history of mining in the area.

The proposed conditional use permit is not intended to restrict public access to historically used recreational lands located north and west of the application boundaries. The broader area was heavily industrialized by mining activities from the mid-1800s through the early-to-mid-1900s and subsequently transitioned toward recreational use, which continues today.

A recreation management plan will address the management of lands and facilities located within the conditional use boundaries.

Washington Department of Fish and Wildlife (WDFW) — Develop a formal recreation-management plan addressing existing and proposed trails, recreational uses, and Fish and Wildlife Habitat Conservation Areas.

>>>>Blue Jay Land Company Response: Blue Jay will prepare a recreation-management plan for the CUP area before the affected recreational facilities are operated, if required by the County or WDFW. The plan will identify authorized trails and uses, seasonal or habitat protections, guest rules, signage, monitoring, and procedures for preventing off-site or unauthorized access. The plan will be consistent with verified critical-areas information and final conditions. KCC 17A; KCC 17.60A.015(4).

Washington Department of Fish and Wildlife (WDFW) — WDFW requests that recreation-management analysis include habitat immediately adjacent to the proposal and under the same ownership, rather than discounting those impacts from the CUP and SEPA review.

>>>>Blue Jay Land Company Response: Blue Jay will provide the County the information required to assess direct, indirect, and project-related recreation impacts within the review scope. The property to the north and to the west is open to the public and is outside of the control of the proposed conditional use boundaries.

Washington Department of Fish and Wildlife (WDFW) — Impose recorded, enforceable conditions protecting Fish and Wildlife Habitat Conservation Areas as Native Growth Protection Areas.

>>>>Blue Jay Land Company Response: Blue Jay does not rely solely on map screening to determine whether Native Growth Protection Areas or Fish and Wildlife Habitat Conservation Areas exist. If a qualified report or County determination identifies a protected area, Blue Jay will comply with KCC Title 17A and any enforceable final condition, including recorded protection where legally required and appropriately supported by the record.

Washington Department of Fish and Wildlife (WDFW) — WDFW states that the 20-year phased proposal lacks sufficient phase-specific detail and requests formally recorded, enforceable Native Growth Protection Area conditions where Fish and Wildlife Habitat Conservation Areas are identified.

>>>> **Blue Jay Land Company Response:** Blue Jay disagrees that the present record supports imposing a formally recorded Native Growth Protection Area (“NGPA”) condition on the property within the conditional use permit boundary.

KCC 17A.01.090(2)(a) expressly provides that NGPAs “shall be used in development proposals for land division” to delineate and protect identified, contiguous critical areas and their buffers. This conditional use application does not propose a land division. Accordingly, the mandatory NGPA provision does not apply merely because a conditional use permit is being reviewed.

Moreover, WDFW has not provided a site-specific identification, delineation, or survey of any Fish and Wildlife Habitat Conservation Area within the conditional use boundary that could serve as the basis for a legally described and recorded NGPA. General Priority Habitats and Species mapping, landscape-level elk information, and historical species observations may warrant further evaluation, but they do not, standing alone, establish the precise presence, extent, boundaries, or required buffer of a recordable protection area. Under KCC 17A.04.020, habitat maps show approximate locations; any site-specific habitat boundary must be established through the applicable County review process and verified by the Director.

The existing condition of the property must also be considered. Much of the conditional use area was historically occupied and altered by Patrick’s Mine and related industrial activities. Existing conditions include mine-related material, disturbed ground, former railroad grades, industrial roads and trails, surface-mining areas, and remnants of supporting mine facilities. Although this history does not automatically exclude the possible presence of wildlife habitat, it is directly relevant to determining the actual location, condition, functions, and values of any alleged habitat area and to determining whether a permanent restriction is necessary and proportionate.

Blue Jay will provide reasonable phase-specific information, cooperate with appropriate site review, and comply with applicable critical-area requirements. If a qualified site-specific evaluation and County determination identify a particular Fish and Wildlife Habitat Conservation Area or buffer that will be affected by a proposed phase, the appropriate protection and mitigation measures can be determined at

that time based on the identified resource, defined boundaries, existing site conditions, and the impacts of that phase.

A blanket or prospective NGPA condition covering historically disturbed land—or unidentified areas that have not been delineated and verified—would be premature and unsupported by the present record. Blue Jay therefore requests that the County decline WDFW’s proposed NGPA condition and instead require only those targeted, site-specific protections that are demonstrated to be necessary under KCC Title 17A.

Washington Department of Fish and Wildlife (WDFW) — Before approval, conduct a site visit with WDFW, the proponent, and County to confirm stream typing and understand the full proposal and potential impacts.

>>>>Blue Jay Land Company Response: Blue Jay has requested a joint WDFW/County site review and which is scheduled for August 26th. No work affecting identified resources will occur before the applicable approvals and conditions are satisfied.

Washington State Department of Transportation (WSDOT)

Washington State Department of Transportation (WSDOT) — Ridgecrest Drive was not constructed under the 2015 Access Connection Permit, the permit has expired, and the owner must immediately reapply for a new permit.

>>>>Blue Jay Land Company Response: Blue Jay acquired the property in 2021 and will promptly coordinate with WSDOT concerning the expired 2015 access-connection permit identified in WSDOT’s comment. Blue Jay will not rely on the expired permit and will submit a new access-connection application if WSDOT requires one. The CUP neither renews a state access permit nor authorizes work in state right-of-way.

Washington State Department of Transportation (WSDOT) — WSDOT states that Ridgecrest Drive may remain and continue serving the property, but the owner must promptly apply for a new Access Connection Permit because the 2015 permit is void.

>>>>Blue Jay Land Company Response: Blue Jay will contact WSDOT concerning the new Access Connection Permit process and will not rely on the expired 2015 permit. Continued or modified access will be subject to WSDOT’s current permit decision and conditions. Blue Jay took the possession of the

property in 2021 and there was no information regarding this expired product in the sales document or the title report.

Washington State Department of Transportation (WSDOT) — WSDOT identifies SR 903 as a managed-access Class 4 highway and identifies Patrick Mine Road as a County-road intersection and Ridgecrest Drive as a private connection.

>>>>Blue Jay Land Company Response: Blue Jay will coordinate all access work with the agency having jurisdiction. It will not treat the CUP as approval to modify a state-highway connection, County-road intersection, or private approach; separate permits and approved plans will govern. KCC 17.60A.015(2), (4); SEPA MDNS conditions.

Washington State Department of Transportation (WSDOT) — Project stormwater and surface runoff must be retained and treated on site; discharge into SR 903 right-of-way requires WSDOT review and approval.

>>>>Blue Jay Land Company Response: Blue Jay will design project stormwater to retain and treat runoff on site to the extent required by applicable County, state, and WSDOT standards. It will not discharge to SR 903 right-of-way without WSDOT's prior written review and approval. Final drainage design, construction permits, and maintenance obligations will be completed before the relevant construction phase. See SEPA MDNS stormwater conditions.

Washington Department of Natural Resources (DNR)

Washington Department of Natural Resources (DNR) — A Forest Practices Application is required if merchantable timber is removed or harvested, or forestland is converted; the applicant should meet with the local forest-practices forester.

>>>>Blue Jay Land Company Response: Before removing merchantable timber, harvesting, or converting forestland, Blue Jay will consult the local DNR forest-practices forester and file a Forest Practices Application whenever chapter 76.09 RCW and implementing rules require one. No clearing or conversion will proceed on the assumption that CUP approval replaces forest-practices authorization; the Company will comply with all final DNR and County conditions.

Enlarged View

1954 NJ-9N-2

**Surface
Mining**

CUP Area

Patricks Mine

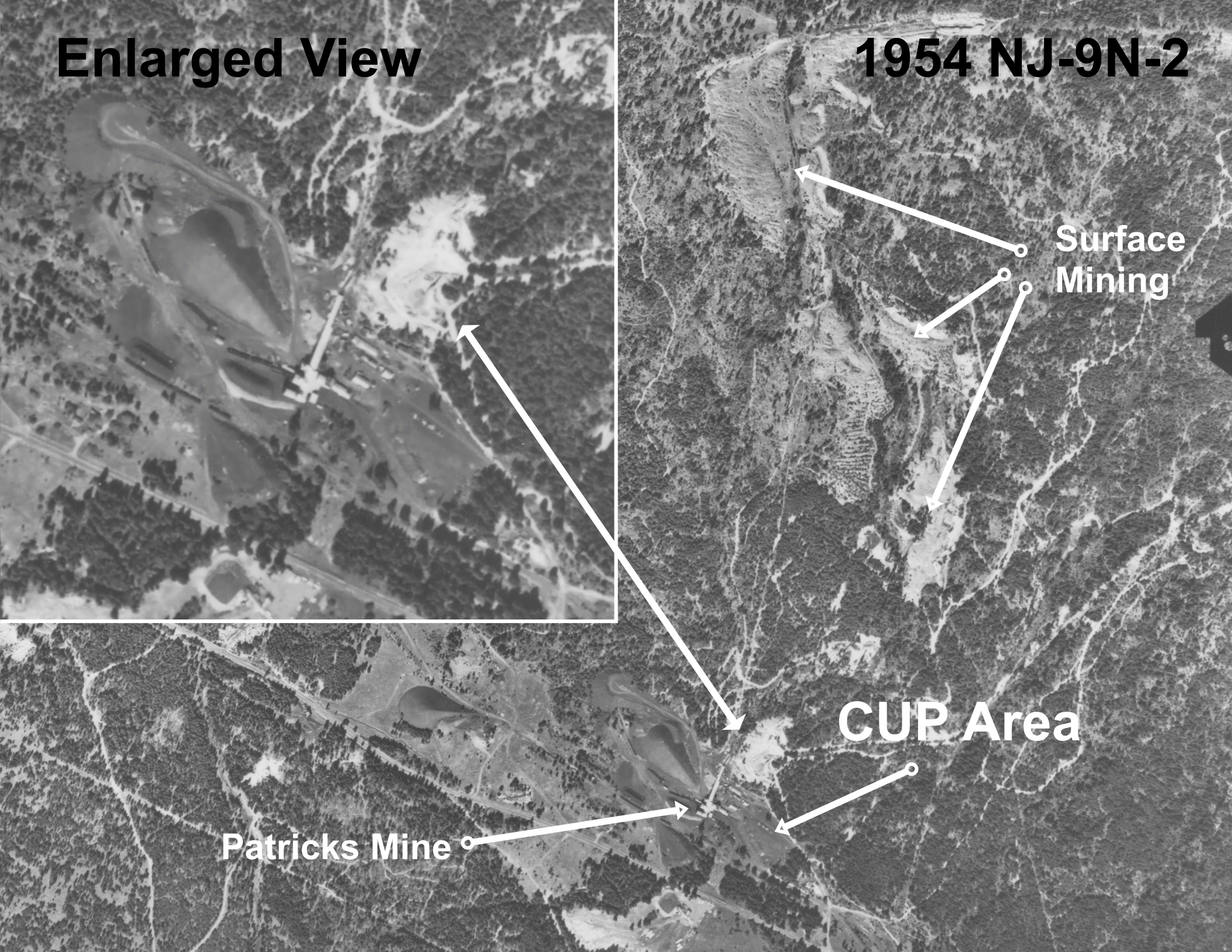


EXHIBIT X13
THE RANCH AT ROSLYN RIDGE
LIMITED HISTORY OF MINING OPERATIONS WITHIN THE RANCH PROJECT AREA

The following is a brief history of past mining activity located within the boundaries of The Ranch. There is surprisingly little information available to the general public regarding the location and operations of Patrick's Mine that operated through 1961 and existed within the boundaries of the proposed ranch. In addition, an aerial photograph of the area that was taken in 1954 has been located in the files of Central Washington University and is shown in Exhibit X4. The following is the best information that has been found.

Despite the fact that the legendary coal market in Kittitas County has been left behind for less than 70 years, there seems to be very little information about it that is widely available to the public. This was certainly the case for Patrick's Mine, which was abandoned within the confines of the proposed Ranch. However, local books and interviews have allowed the applicant to catch a glimpse of its history.

Around the turn of the 20th century, Archibald S. Patrick, a former prospector for the Northern Pacific Railway, found and subsequently created a company centered around a new section of land that was found to possess coal. The company, called the Roslyn Cascade Coal Company, was "the most enduring and the most successful" in all of Kittitas County (Coal Towns in the Cascades, 1986) and founded Patrick's Mine. Other coal companies, such as the Roslyn Fuel Company, owned successful mines around the area of Patrick's Mine but paled in comparison to the RCCC.

One of the limited sources about the daily operation is credited to a local miner, Marion Maras, through a series of interviews done by Central Washington University found here (1). Maras was a Roslyn resident all his life and worked in Patrick's Mine in the 1950s mostly installing and operating conveyors and other machinery. He described the layout of the mine as having nine levels with the main slope measuring about a half mile

long. Smaller entries that extended from this led to other parts of the mountain, with some traveling as far as the Teanaway. Rocks were hand drilled with a jackhammer and everything was loaded by hand.

The main export of Patrick's Mine was Central Washington University. "Patrick sold all or most of their coal to Central... when Central quit using coal the [market] went to pot," said Maras. So, when CWU started using other sources of energy, the mine was out of options and, in the winter of 1961, it closed. Unfortunately for local miners, this was the only economic source for the small town at the time and, therefore, many of the workers were out of options. Maras said that no one was notified: "We didn't know [the mine disbanded] until it was closed." Most of the employed men ended up moving out of town, and many moved to Seattle to work for Boeing.

Since then, there have been no more orders. Patrick's Mine has been boarded up and the only reminders are piles of washed rock, which Maras explained to be leftover rock that has been separated from usable coal and subsequently discarded. As people drive by, there is nothing that marks the area as being economically significant or even appealing. While the Kittitas County Historical Society does not recognize this area as being historically significant, Patrick's Mine should not be left as piles of washed rock but should hold a more impressive legacy where residents and guests alike can enjoy an area that is a slice of Kittitas County history. The proposed Ranch at Roslyn Ridge will define and continue to teach this legacy.

(1) <https://media.cwu.edu/media/Marion+Maras+Video+Interview%2C+2002%2C+part+1/1_eklf2x6c>