

DRAFT

August 1, 2008

Mr. Darryl Piercy
Kittitas County Community Services Director
411 North Ruby Street, Suite 2
| Ellensburg, Washington 98926

RE: Proposed site rezone; Black Gold PUD rezone (Z-08-07) and Black Gold PUD Phase 1 Short Plat (SP-08-28).

Dear Mr. Piercy:

Thank you for sending the Washington State Department of Community, Trade and Economic Development (CTED) the proposed amendments to Kittitas County comprehensive plan and development regulations that we received on July 23, 2008.

We have reviewed the application materials transmitted to us by your staff and have some concerns regarding this proposal. We request this comment letter be included in the public record and submitted to the hearing body for their consideration. This proposal is for a rezone of approximately 286 acres from Rural 3 to Planned Unit Development (PUD). As proposed, the PUD would allow for future development of up to 286 dwelling units, including up to 80 multi-family units. The subject property is generally located between the City of Roslyn and the unincorporated area of Ronald.

Our concerns are as follows:

- The land area of the subject application is designated as “Rural” in the Kittitas County Comprehensive Plan. CTED is concerned that a development proposal of this magnitude is being processed without the benefit of the concerns raised by CTED and others in the comprehensive appeal being settled.
- Density: The PUD chapter, 17.36 KCC, does not specifically grant an increase in density from that of the underlying zone. Given that, and the fact that the parcel is designated as rural in the Kittitas County comprehensive plan, a development approval at a non-rural density is not appropriate. Has the county determined that one unit per acre is a rural density? If yes, that decision was not clearly portrayed in the comprehensive plan policies.

Of additional concern is the applicant’s statement on page 5 of the application stating:

“The PUD will be developed in accordance with the criteria established under KCC Chapter 17.36, Planned Unit Development Zone and pursuant to the Kittitas County-Wide Planning Policy for ‘Continuous and Orderly Development, Policy 4, Planning Unit Developments, Policy D’ which states that ‘Standards shall be developed for residential PUDs outside of UGAs and UGNs for a maximum density of adjustment not to exceed a 3:1 ratio of the underlying zone...’ Because the proposed residential PUD is not within a UGA or UGN the 3:1 ratio will apply and will not be exceeded when the housing density is expressed in terms of living units per building and per net acre.”

- A County-Wide Planning Policy (CWPP) is not a development regulation. It does not provide guidance to indicate under which circumstances an increase in density may be warranted, nor does it contain criteria needed in order to obtain any increase in density. It is CTED’s opinion that the interpretation of CWPPs allowing a 3:1 density increase outright, simply by requesting a residential PUD rezone, is erroneous.
- The materials sent for review do not contain a conceptual development plan for the full area of the proposed PUD. This makes it impossible to discern the proposed open space areas, perimeter buffers (if any), overall development patterns, full site access and circulation patterns, how the proposal will interact with parcels that appear to be surrounded by the proposal, etc. The short plat portion sent to CTED for review consists of 3 lots on approximately 18.22 acres.
- Are there any critical areas on the site? If so, will they be incorporated into open space areas? Is there a minimum amount of open space required?
- There does not appear to be a transportation analysis for the proposal. Actually, the average daily traffic generation rate provided in the SEPA checklist may be higher than likely, due to the fact the multi-family units generally produce less traffic than a single family residence, according to the ITE manual. Our concern, however, is that without a traffic study or other documentation, it is not apparent that the existing transportations system, including both state and local roads, is adequate to provide the required service to the site.
- CTED is concerned that adequate capacity for urban-type services may or may not be available. It is commendable that the applicant desires to provide affordable housing as a component of this development. However, multi-family units, and an overall density of one unit per acre, require a certain level of services that were likely not anticipated as part of the Rural land use designation. Is there adequate capacity for provision of water, sewer, police and fire protections, as well as school capacity to serve a development of this intensity outside of an urban growth area?
- CTED is concerned that a development of this intensity, in such close proximity to the City of Roslyn, the City of Cle Elum, and the Town of South Cle Elum, will have a detrimental impact to their urban growth strategies and could potentially direct growth away from areas previously slated to provide for urban development.

We respectfully request to be notified of additional submittals, such as a conceptual development plan for the full 286 acres, a transportation analysis, an assessment of whether or not there are any critical areas on the site, or the issuance of SEPA threshold determination.

If you have any questions or concerns about our comments or any other growth management issues, please contact me at (360) 725-3045 or joycep@cted.wa.gov. We extend our continued support to the Kittitas County in achieving the goals of growth management.

Sincerely,

Joyce Phillips, AICP
Growth Management Planner
Growth Management Services

JP:ss

cc: Mark McClain, Chairman, Board of County Commissioners
Dan Valoff, Staff Planner
Leonard Bauer, AICP, Managing Director, Growth Management Services, CTED
David Andersen, AICP, Plan Review and Technical Assistance Manager, Growth Management Services, CTED