| From: | Carrie McClinton | | |
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| То: | Chace Pedersen | | |
| Subject: | The Outpost CUP - SEPA Checklist Comments | | |
| Date: | Friday, December 1, 2023 11:56:21 AM | | |
| Attachments: | image.png | | |
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Hello Chace,

Please see questions and comments related to the developer submitted SEPA Checklist and their responses <<u>here</u>>.

I have included a screenshot of the SEPA Checklist question and then my comment below. Please let me know if any of the thumbnails/screenshots that I've included as a reference do not come through and I will resend.

Thanks for your attention and fielding all of the concerns around this proposed development.

-Carrie McClinton

p.

4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. [help]

No surface water withdrawal or diversions are proposed as part of the project.

• I believe there is a springbox included in the plans for this development. If they the developer is taking water from the spring, they commented incorrectly that "no surface water withdrawal or diversions are proposed as part of the project." This would require mitigation to utilize for the development.

- Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. [help]
 - A well will serve the site with water, a septic system will service sewer, and existing electricity will be maintained.
 - This response states that they will use the current well on site as the water source. This current well is built for 1 structure/home. This well could not possibly serve this volume of people without mitigating for additional water rights.
 - 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals...; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. [help]

Waste material will not be discharged as part of the work.

- They have proposed a septic system. An example in this section is "domestic sewage" which will be part of operating modern plumbing and will discharge waste material into the drainfield from septic. This answer does not appear accurate.
- b. What kind and amount of vegetation will be removed or altered? [help]

Native vegetation and small trees will be removed as part of the access construction.

• There are many large trees on this property. To state ***only small trees*** will be removed would be difficult, if not impossible, to accomplish when building the proposed structures. How is the developer to be held accountable to their response?

5. Animals [help]

a. List any birds and other animals which have been observed on or near the site or are known to be on or near the site. [help]

Examples include:

birds: hawk, heron, eagle, songbirds other: mammals: deer, bear, elk, beaver, other: fish: bass, salmon, trout, herring, shellfish, other _____

• Circling examples provided is not a thorough effort to identify animals or wildlife in the area. I am not an expert in wildlife, however it seems necessary to include more than what the developer submitted. Two additional examples are hawks and salmon in Lake Cle Elum "near the site". An expert government agency would be able to further expand on this list of "observed birds and animals on or near the site."

d. Proposed measures to preserve or enhance wildlife, if any: [help]

No impacts to wildlife are anticipated as part of the proposed recreational development with the majority of the parcels remaining in the native existing conditions.

- It is impossible not to impact wildlife with this recreational development and human activity on site. It is disingenuous to say otherwise. I have seen elk walk down Sandelin Lane and bed down in this area. A heard of Elk are not going to march directly into a campground that is filled with people. Also, while bears will seek out garbage, whereas before this was a place to roam and hunt, they will now be entitled to the area with garbage but considered a danger or nuisance when this is actually THEIR backyard people are camping in!
- 4) Describe special emergency services that might be required. [help]

Emergency services would be required if a medical emergency or similar occurred during construction or recreational use.

• Omission of fire and police which are short staffed emergency services.

b. Noise [help]

- What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? [help]
 - Traffic from SR 903 adjacent to the site.
- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. [help] Construction noise would occur short term. Long term noise would result from people utilizing the cabins and vehicles accessing the site for recreational use.
- 3) Proposed measures to reduce or control noise impacts, if any: [help]

Construction equipment will be shutdown during periods of no use. For final conditions the check in and check out times will be regulated to regular business hours with established 'quiet times'.

• #3 is a "check the box effort" that will not meaningfully impact overall noise. People are camping and recreating. No amount of signs will contain the additional ambient noise generated from this number of people.

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8. Land and Shoreline Use [help]

a. What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe. [help]

The current use of the site is a vacation home for recreational use. There is a housing community to the south and individual residential lots across 903 (east) and to the north. No current land uses will be affected.

• This is incorrectly represented. There are housing communities, with associated HOA's, surrounding this property (Sunshine Estates: on both the lake side and across 903, The Cove and Domerie Bay). These land uses will be affected by the additional density and

noise.

| 9. | Housing | [hel | p] |
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 Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. [help]

The proposed use is recreational.

• The number of units is omitted from this response.

c. Proposed measures to reduce or control housing impacts, if any: [help] Not applicable.

• This is applicable for a response

e. What is the current zoning classification of the site? [help]

Rural recreation zoning.

f. What is the current comprehensive plan designation of the site? [help]

Rural Residential

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L. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: [help]

Procurement of a Conditional Use Permit through Kittitas County.

• This plan is NOT Rural Residential and does not embrace the goal of R5 zoning, hence the developers application for a Conditional Use Permit because it its NOT compatable with existing and projected land uses and plans.

c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: [help]

The proposed project is intended to enhance recreations opportunities in the area.

• What does this mean? And, specifically, how is this project enhancing recreation opportunities in the area?

b. Are there any landmarks, features, or other evidence of Indian or historic use or occupation? This may include human burials or old cemeteries. Are there any material evidence, artifacts, or areas of cultural importance on or near the site? Please list any professional studies conducted at the site to identify such resources. [he]p]

None that are known.

• In responses to the CUP Application, the developer was asked by Yakima Nation, Department of Archaeology & Historic Preservation and The Confederated Tribes of the Colville Reservation about landmarks, features or other evidence of Indian or historic use or occupation. *With this response and resulting requests, it is now known and requires action.*

Yakima Nation Response <<u>full response here</u>>

Due to the extreme high probability of this location, known and previously recorded sites in proximity, and cultural importance to the Yakama Nation, our office is requesting full archaeological survey. Please continue to correspond with our office on this matter.

Department of Archaeology & Historic Preservation Response <full response here>:

Our statewide predictive model indicates that there is a high probability of encountering cultural resources within the proposed project area. Further, the scale of the proposed ground disturbing actions would destroy any archaeological resources present. Identification during construction is not a recommended detection method because inadvertent discoveries often result in costly construction delays and damage to the resource. Therefore, we recommend a professional archaeological survey of the project area be conducted and a report be produced prior to ground disturbing activities. This report should meet DAHP's Standards for Cultural Resource Reporting

We also 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.

Confederated Tribes of the Colville Reservation Response <<u>full response here</u>>

The proposed project lies within the traditional territory of the Wenatchi Tribe, 1 of the 12 constituent tribes of the Confederated Tribes of the Colville Reservation (CTCR), 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 CTCR 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 territory in Idaho, and south-central British Columbia.

As ground disturbing activities are to be conducted, such as the installation of a septic system or the scraping of a driveway, a cultural resource surface survey and sub-surface testing of the area in and directly around the proposed ground disturbance are recommended as a surface observation will not be an accurate assessment of the existent potential for sub-surface cultural deposits. This test should be to the terminal depth of the septic installation to ensure the totality of the presence or absence of cultural material.

There are known cultural resources of precontact and historic significance nearby and this particular parcel is considered Very High Risk for an inadvertent discovery according to the

DAHP predictive model. This parcel has not been previously surveyed and a preliminary archaeological investigation would be prudent.

CCT requests a cultural resource survey prior to the implementation of ground disturbing activities and that during implementation that there be an inadvertent discovery plan or (IDP) in place to ensure compliance with all Section 106 and relevant cultural resource laws both federally and to the state of Washington.

c. Describe the methods used to assess the potential impacts to cultural and historic resources on or near the project site. Examples include consultation with tribes and the department of archeology and historic preservation, archaeological surveys, historic maps, GIS data, etc. [help]

Review of historical maps.

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• It seems like much more should be required here when the developer states that there are no known landmarks, features or other evidence of Indian or historic use or occupation (13b). Ignorance based on lack of research should not be an acceptable answer.

c. How many additional parking spaces would the completed project or non-project proposal have? How many would the project or proposal eliminate? [help]

Final conditions would include (1) parking space per cabin with additional overflow areas for total parking of (35) spaces.

• 1 parking space per cabin with an additional 5 extra spaces. 1-2 grounds/caretaker designated to the project year-round, this leaves even less. To think every camping unit will come with only one car is not accurate. Also, if campers have recreational vehicles, where will they park them?

f. How many vehicular trips per day would be generated by the completed project or proposal? If known, indicate when peak volumes would occur and what percentage of the volume would be trucks (such as commercial and nonpassenger vehicles). What data or transportation models were used to make these estimates? [help]

Per the attached Traffic Impact Analysis prepared by TENW the project is anticipated to generate 56 new trips during the Friday PM peak hour (33 entering, 23 exiting).

• A traffic analysis was done by the developer <<u>here</u>> and significantly undermines the impact to the area.

This is a gross underrepesentation of what the actual traffic impact would be to the area. The goal for this project is year-round 100% occupancy. People will be coming/going at all hours to:

- the grocery store
- go out to eat or to bars
- town (Cle Elum, Roslyn, Ronald)
- head uplake to the river or to Speeli to go to the beach
- use recreational vehicles (theirs or rented)

People will not simply arrive and "stay" at the campsite. I urge you to take a close look at this

study and consider what you know to be true about a campground with this many sites before taking this estimation as accurate.

As of 12/1/23 12pm only the department of WSDOT Aviation responded with no comment as it isnt relevant to them. WSDOT has not responded.

NO.

h. Proposed measures to reduce or control transportation impacts, if any: [help]

Maintain a speed limit through the site.

• Mantaining a speed limit through the site doesnt help anything off-site on hwy 903, nor does it speak to stopping people from using private residential roads in the area (Wadsworth Loop, Sandelin, Crickett, etc.).

15. Public Services [help]

a. Would the project result in an increased need for public services (for example: fire protection, police protection, public transit, health care, schools, other)? If so, generally describe. [help]

The area is already served by public services such as fire and police protection.

• Is it accurate to say there wouldn't be an increased need for public services? We are served by volunteer firefighters and also have shortages in police serving the existing area. Health care 911 services are not even listed. Instances of emergency are likely to be higher with this density of people and the nature of camping.