

March 10, 2022

Kelly Bacon, Planner I Kittitas County Community Development Services 411 North Ruby Street, Ste 2 Ellensburg, Washington 98926

Sent via email: Kelly.Bacon.cd@co.kittitas.wa.us; cc: steve@lwhsd.com

RE: Suncadia Phase 2 Division 7 Long Plat (LP-22-00001) Preliminary Plat Received Commentary Applicant Responses

Dear Kelly:

Suncadia Resort LLC is submitting this letter in response to the transmittal of combined comments for the Suncadia Phase 2 Division 7 Preliminary Long Plat (LP-22-00001) received Tuesday March 01, 2022. Below you will find responses to each of the received comments. Please let us know if you have any questions.

#### Washington State Department of Health Office of Drinking Water - Russell Mau

Response: Suncadia Resort is actively engaged with Suncadia Water Company's update of the resort water model knowing the approved connection count is at 140 remaining approved connections after this plat. Suncadia Resort LLC, through Suncadia Water Company, ensure continued conversation and mitigation with Department of Health as we near the approved connection limit.

### Washington State Department of Fish and Wildlife - Scott Downes

Response: Suncadia recognizes that "Stream D" is currently listed as a Type F fish-bearing stream on the DNR online GIS water maps. However, in the Master Planned Resort Final Environmental Impact Statement (MPR-FEIS) and Master Drainage Report prepared for the Suncadia Resort "Stream D" is not classified as a fish-bearing stream. The only fish-bearing streams determined in the MPR-FEIS within the master-planned resort boundaries are Domerie Creek and Cle Elum River both of which do not enter or encroach this development. Suncadia will submit a water type modification request for Stream D when we submit our Forest Practice Application for this development. Pending review of the stream from the Interdisciplinary Team, Suncadia will coordinate and implement the appropriate mitigation measures at that time. We appreciate WDFW's willingness to work with Suncadia on this process and anticipate submitting applications soon.

# <u>Washington State Department of Transportation – Paul Gonseth</u>

*Response:* Traffic impacts of the Master Planned Resort (MPR) continue to remain considerably lower than the initial estimates in the MPR-Final Environmental Impact Statement. Pursuant to the 2014

Traffic Monitoring Report, on January 13, 2015, Kittitas County waived further traffic monitoring pending certain conditions, none of which have yet occurred. Regardless of any conditions being met, Suncadia is in the process of producing an updated Traffic Monitoring Report to appease conditions C-17 and C-18 of the Development Agreement with Kittitas County. Updated report of traffic monitoring is intended for completion prior to year 2025.

#### **Dave Jaderlund**

Response: Suncadia adheres to all applicable regulations outlined and mitigated within the Development Agreement and the Master Planned Resort Conditions of Approval. The Suncadia resort property was extensively surveyed for environmental impacts during the environmental impact process culminating in the identification of all natural water bearing elements within the resort. Each development within Suncadia is designed and surveyed by engineers and professionals that consider and mitigate each feature before design is submitted for regulatory review. The natural bodies of water are regulated by federal and state law with associated setbacks and requirements, of which Suncadia developments respect and adhere to. Natural flora and fauna are an essential back-bone of Suncadia. Of the 6,400 resort acres, over 80% is to remain un-disturbed open space for natural flora and fauna. Suncadia's design review covenants, conditions, and restrictions are in-place to further protect open space around each development and built structure.

#### **Michele Jaderlund**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate.

# **Bruce and Robbi Duff**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate.

# **Ingrid Vimont**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the Resort. Suncadia's development and extension of Swiftwater Drive from Bullfrog Road to Highway 903 creates alternatives for emergency routes for both Suncadia and the neighboring communities, if emergency officials deem necessary in time of need. Development inherently clears and thins thick vegetation fuels and creates surface water features that are all contributors in mitigating emergencies.

## **Mark Lucas**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate.

# **Gilhannon and Cheryl Coupens**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate.

## Ira Astrachan

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate.

#### **Jarrod Durkee**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate.

# Washington State Department of Archaeology and Historic Preservation - Sydney Hanson

Response: The entire Suncadia resort property has been extensively surveyed for cultural and historic sites during the environmental impact process culminating in the identification of sites as well as adoption of appropriate mitigation measures as set forth in Conditions of Approval C-21 – C-23 of Exhibit F to the Development Agreement with Kittitas County. Central Washington Anthropological Survey (CWAS) of Central Washington University has been retained by Suncadia for this development to perform archaeological subsurface testing in order to define the boundaries of four archeological sites recorded during the extensive archeological survey. CWAS is also evaluating eligibility of any buildings or structures within this development. Subsurface testing and boundaries will be completed by CWAS and recorded with the Department of Archaeology and Historic Preservation prior to any disturbance within the site buffers. Suncadia is very cognizant and sensitive to cultural resources and historic properties and always preserve, protect, and follow all applicable rules and regulations.

## Washington State Department of Ecology – Tricia Sawyer on behalf of Gwen Clear

Response: The applicant will adhere to all applicable regulations outlined in the Development Agreement, the Erosion Control Plan, and the MPR Conditions of Approval. For construction activities, Suncadia Resort LLC maintains a stormwater pollution prevention plan for the entire Master Planned Resort (MPR) that will also be applicable to this development. An NPDES permit for MPR construction activities has been issued by the Washington State Department of Ecology (Permit No. WA-005236-1). Conditions of the permit specify erosion control measures that will be used during construction activities.

#### <u>Kittitas County Public Health – Holly Erdman</u>

*Response:* There are no on-site septic systems utilized for wastewater management with this development. Residences are either serviced by gravity sewer or grinder pump systems that tie into the gravity system that flow to an existing sewer lift-station.

Suncadia is in a Group-A water system with a green operating permit status. Suncadia resort holds enough water rights that are sufficient for full build-out of the resort. Work is ongoing to calculate what present infrastructure capacity is for current and future development.

## **Erin and Erich Naumann**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate.

# <u>Kittitas County Public Works – Public Works Plan Review Team</u>

Response: Suncadia acknowledges conditions 1-5 of preliminary approval from Kittitas County Public Works and will address prior to final plat; with the exception of #5.2 "Traffic Monitoring Plan" (TMP) as the current agreement with Kittitas County Public Works is to have TMP report complete by 2025 and not prior to this development final plat. Regarding accounting method for water connections, please see response to Russell Mau with the Washington State Department of Health Office of Drinking Water. Regarding wastewater, additional utility reporting requirements established post October 1, 2000 do not apply to Suncadia, including waste water treatment, but as a courtesy with regard to the public works request, 1,129 sewer connections have been made out of the 3,787 ERU allotment from the wastewater treatment facility. Regarding traffic monitoring, Traffic impacts of the MPR continue to remain considerably lower than the initial estimates in the MPR-FEIS. Pursuant to the 2014 Traffic Monitoring Report, on January 13, 2015, Kittitas County waived further traffic monitoring pending certain conditions, none of which have yet occurred. Suncadia along with their traffic consultant is in currently engaged in the report update process with Public Works and anticipate providing report well before the year 2025 requirement. After the development of the site, water quality treatment will be provided for runoff from impervious road surfaces requiring stormwater treatment, including bio-filtration swales, bio-infiltration, and sheet flow dispersion.

## **Lisa Kendall**

Response: This comment appears to be in regards to the 47 Degrees North project within the City of Cle Elum Urban Growth Area on the south side of Bullfrog Road and not specific to this long plat application. That project will have its own traffic mitigation requirements. In regards to Bullfrog Road adjacent to Suncadia Resort, traffic impacts as a result by the Master Planned Resort (MPR) continue to remain considerably lower than the initial estimates in the MPR-Final Environmental Impact Statement. Suncadia is in the process of updating Traffic Monitoring Reports in collaboration with Kittitas County.

#### Susan Childers and Alan Feldberg

Response: Natural flora and fauna are an essential back-bone of Suncadia. Of the 6,400 resort acres, over 80% is to remain un-disturbed open space for natural flora and fauna. Suncadia's design review covenants, conditions, and restrictions are in-place to further protect open space around each development and built structure. Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all approved access points to the resort, including the Highway 903 intersection gate.

#### **Chris Collins**

Response: Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all access points to the resort, including the Highway 903 intersection gate. Suncadia adheres to all applicable regulations outlined and mitigated within the Development Agreement and the Master Planned Resort Conditions of Approval.

#### **Colville Confederated Tribes – Aren Orsen**

Response: The Suncadia Resort property was extensively surveyed for cultural and historic sites during the environmental impact process culminating in the identification of sites as well as adoption of appropriate mitigation measures as set forth in Conditions of Approval C-21 – C-23 of Exhibit F to the Development Agreement with Kittitas County. Central Washington Anthropological Survey (CWAS) has been retained by Suncadia to perform archaeological subsurface testing in order to define actual site boundaries for this development. Subsurface testing will be completed by CWAS and recorded with the Department of Archaeology and Historic Preservation prior to any disturbance in the vicinity of the sites. Suncadia is very sensitive to cultural resources and historic properties and intend to preserve, protect, and follow all applicable rules and regulations.

#### **Kathleen Perkins**

Response: Natural flora and fauna are an essential back-bone of Suncadia. Of the 6,400 resort acres, over 80% is to remain un-disturbed open space for natural flora and fauna. Suncadia's design review covenants, conditions, and restrictions are in-place to further protect open space around each development and built structure. Access points to the Suncadia Resort were identified during the environmental impact statement and entitlement process for the Development Agreement. All access points identified and conveyed in the Development Agreement with Kittitas County have been provided with multiple points of access for emergency personnel. Suncadia Resort partakes in continual

discussions and mitigation efforts with emergency and fire officials on access and egress to the resort. Emergency personnel have 24 hours per day, 365 days per year access and egress at all approved access points to the resort, including the Highway 903 intersection gate.

# <u>Confederated Tribes and Bands of the Yakama Nation – Casey Barney</u>

Response: The Suncadia Resort property was extensively surveyed for cultural and historic sites during the environmental impact process culminating in the identification of sites as well as adoption of appropriate mitigation measures as set forth in Conditions of Approval C-21 – C-23 of Exhibit F to the Development Agreement with Kittitas County. Central Washington Anthropological Survey (CWAS) has been retained by Suncadia to perform archaeological subsurface testing in order to define actual site boundaries for this development. Subsurface testing will be completed by CWAS and recorded with the Department of Archaeology and Historic Preservation prior to any disturbance in the vicinity of the sites. Suncadia is very sensitive to cultural resources and historic properties and intend to preserve, protect, and follow all applicable rules and regulations.

Very truly yours,

Lathan Wedin

Vice President of Development

Suncadia Resort LLC

Cc: F. Steve Lathrop, Authorized Agent

via email