

December 2, 2022

EA Engineering, Science, and Technology, Inc., PBC
2200 Sixth Avenue, Suite 707
Seattle, WA 98121

Attn: Gretchen Brunner

Transmitted via email to: gbrunner@eaest.com

**Re: Draft: Response to 2022 47° North Revised Proposal
Air Quality and Noise Assessments
Cle Elum, Washington
Landau Project No. 0878007.020**

Dear Gretchen:

At the request of the City of Cle Elum, Landau Associates, Inc. (Landau) under contract with EA Engineering, Science, and Technology, Inc. (EA) prepared Air Quality and Noise technical reports in 2020 to provide technical information and analyses to support the Supplemental Environmental Impact Statement (SEIS) for the 47° North Project in Cle Elum, Kittitas County, Washington. These analyses and associated SEIS supplemented the 2002 Trendwest Properties: Cle Elum Urban Growth Area Environmental Impact Statement.

This letter is provided in response to the 2022 “47° North Revised Master Site Plan Amendment Proposal” (Revised Proposal), which is based on the revised formal application prepared by Sun Communities that incorporates some focused revisions to the project that were evaluated in the 2020/2021 SEIS. This letter is intended to supplement the 2020 technical reports, which provide detailed explanations of the analyses referenced herein.

Landau was provided with a revised project description, a land-use summary comparison of the 2020 “SEIS Alternative 6” to the Revised Proposal, site plans, and traffic data associated with the Revised Proposal.

Summary of Changes

Based on the information received by Landau from EA and Transportation Engineering NorthWest (TENW), the Revised Proposal includes the following changes from the 2020 SEIS Alternative 6, relevant to the air quality and noise analyses:

- The inclusion of 50 affordable housing units within the multi-family area, increasing the total number of dwelling units from 707 to 757.

- Commercial property development previously included in the analysis as “potential future commercial” has been included in the Revised Proposal. Proposed commercial uses have changed to eliminate medical offices and increase retail, restaurant and general office use.
- The 12.2-acre municipal recreation center that was previously included in the project has since been dedicated to the City, so it has been removed from the Revised Proposal.
- The amount of land apportioned for RV resort sites was decreased by approximately 20 acres; however, no change was made to the number of individual RV sites.
- Approximately 78 acres of undeveloped open space have been added to the Revised Proposal: a 55-acre parcel that has been added to the property and approximately 23 acres of currently undeveloped land converted from other proposed uses.

Air Quality

From an air quality perspective, an increase in multi-family housing units represents a negligible increase in potential greenhouse gas (GHG) emissions compared to the analysis presented in the 2020 Air Quality Technical Report.

In 2020, the commercial property development was considered potential future development, not part of the Master Plan, but was conservatively included in the GHG calculations. Slight changes in the commercial uses are forecast to result in slight changes in GHG emissions due primarily to the number of vehicle trips associated with each commercial use.

The municipal recreation center was not previously included in the GHG calculations, so removal from the Revised Proposal does not change the air quality analysis. The increase in undeveloped open space slightly decreases the amount of GHG attributable to soil carbon emissions (emissions associated with removal of vegetation).

The 2020 Air Quality Technical Report compared forecast annual project emissions to statewide forecast emissions (2035). Landau estimated potential annual GHG emission changes associated with the Revised Proposal compared to the 2020 Alternative 6. Forecast annual project emissions for both 2020 Alternative 6 and the Revised Proposal represented 0.03 percent of 2035 statewide forecast emissions. The Revised Proposal would represent an increase of 0.001 percent of annual statewide forecast emissions.

The addition of 50 affordable housing units and the change in commercial uses associated with the Revised Proposal will slightly increase vehicle tailpipe emissions. However, because the region is in attainment for all criteria pollutants, and because this would only slightly increase tailpipe emissions, it is unlikely that air quality impacts at local intersections would be significant or cause a “hot spot.”

Noise

From a noise perspective, the changes described above are not expected to result in significant changes to the noise environment as summarized in the 2020 Noise Technical Report. The increase in

dwelling units and change in mix of commercial uses are not expected to result in a change in short-term construction noise or long-term operational noise as described in the 2020 report (noise associated with the use and maintenance of residences, parks, commercial uses, etc.). Site plans do not indicate significant changes in the location of residential land use, commercial land use, RV resort, or other use categories.

The Revised Proposal is not expected to result in significant changes to local roadway noise, as described below. The locations at which new project roadways would intersect with existing roadways and the distances between project roadways and existing sensitive land uses appear unchanged. Landau estimated potential changes in traffic noise by comparing project-related traffic estimates provided by TENW. The following changes were noted:

- TENW recalculated forecast traffic increases based on updated traffic counts conducted in 2022. TENW increased the assumed rate of traffic increase over time for weekday traffic along Bullfrog Road in the No Action model only (2020 Alternative 5), resulting in approximately 5 to 15 percent higher traffic volumes. These relatively small increases are not associated with the Revised Proposal.
- Landau compared worst-case Sunday PM peak-hour traffic volumes for the Revised Proposal (full buildout in 2031, provided by TENW) to equivalent traffic data for 2020 Alternative 6 (full buildout in 2037). For the traffic segments modeled, with the exception of two segments described below, there was no change in forecast traffic volume, or an increase between 1 and 8 percent over the estimated traffic data used in 2020 (between 2 and 60 vehicles per hour).
- For two roadway segments, TENW reported potential increases in traffic volume between 25 and 35 percent.
 - RV Park Access off Bullfrog Road. Receivers A1 and A2 represented residential areas north of the project site (in the Suncadia Resort), north of Bullfrog Road. TENW forecast an increase in traffic on RV Park Access Road of approximately 25 percent compared to Alternative 6.
 - Site Access Road off West 2nd Street.¹ Receiver B1 represented a residential area northeast of the project site (Cle Elum Pines West), east of West 2nd Street / State Route 903. Receiver B2 represented the Cle Elum-Roslyn School District #404 campus located northeast of the project site. TENW forecast an increase in traffic on Site Access Road of approximately 35 percent compared to Alternative 6.

Landau estimated the change in noise levels associated with the roadway segments listed above by revising the relevant 2020 screening-level noise models. The maximum modeled increase in noise level between the 2020 Alternative 6 and the Revised Proposal was 0.3 A-weighted decibels (dBA), imperceptible to the human ear.² This change in modeled noise levels does not represent a change to

¹ TENW added Bala Drive to the intersection of West 2nd Street and Main Access Road. Bala Drive provides access to the development to the northeast of 47° North and is not project-related. No traffic is predicted to enter or exit Bala Drive traveling to or from the project Main Access Road.

² Under ideal listening conditions, differences of 2 to 3 dBA can be detected by some people. Most people, under normal listening conditions, can perceive a 5-dBA change in noise of a similar nature.

the original analysis, which modeled noise levels exceeding the Washington State Department of Transportation (WSDOT) threshold of 66 dBA at receiver location B1. Use of federal or state funds for roadway or intersection improvements would trigger the WSDOT requirement to model traffic noise impacts and evaluate traffic noise abatement at impacted receivers.

Conclusions

Based on a review of information provided by EA and TENW, Landau concluded that the changes associated with the Revised Proposal, compared to the 2020 Alternative 6, do not represent significant changes with respect to potential air quality or noise impacts. Revised Air Quality and Noise technical reports are not required.

LANDAU ASSOCIATES, INC.

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